



## GRHRDD Step 1 Tool

### GRACE Model GBVH Workplace Policy for Suppliers

The GRACE GBVH workplace policy, which incorporates best practices, serves as a tool that brands can collaborate on with their suppliers to enhance their operations. Often, suppliers are unsure about what to include in a workplace policy. This model policy guides best practices that can be tailored to different legal and national contexts. It provides an overarching and comprehensive framework for any organisation to use and adapt. At the end of the policy is a glossary of definitions used in the policy.

Suggested themes to cover in a policy	Good practice guidance
<b>1. Statement of commitment to ending GBVH</b>	<ul style="list-style-type: none"><li>▶ A strong commitment from the CEO and senior managers of the importance of the policy for safety and health of the workforce, an inclusive working environment and the respect for all workers.</li><li>▶ A commitment is made to zero-tolerance to inaction.</li><li>▶ Role and purpose of the policy (e.g. preventing and prohibiting GBVH, respect and dignity of all workers, a zero-tolerance to inaction).</li><li>▶ A clear and comprehensive definition of GBVH (see for example the definition in ILO C190 in the glossary at the end of the policy), and specifically GBVH (physical, verbal, non-verbal and sexual forms of violence and harassment, as well as sexual abuse, threats of violence and harassment, stalking and cyber-violence). Give examples of inappropriate conduct.</li><li>▶ Recognition is given to the root causes e.g. unequal power relations in the workplace and to addressing factors that contribute to the occurrence of GBVH.</li><li>▶ There is no retaliation, threats or reprisals against a complainant, witness or bystander, but also to the business itself, ensuring there are no consequences such as reduced orders or termination of the supplier relationship.</li><li>▶ Reference to provisions in existing laws that outlaw GBVH, and make reference to the alignment of the policy with ILO C190 and R206 (see Appendix to the policy).</li><li>▶ The policy specifically refers to gender, and although this primarily concerns women workers, the policy also covers LGBTIQ+ workers whose sexual orientation or gender identity are a cause of discrimination and GBVH.</li></ul>

Suggested themes to cover in a policy	Good practice guidance
<p><b>2. Scope of the policy</b></p>	<ul style="list-style-type: none"> <li>▶ GBVH in the world of work (including during work-related travel, meetings outside of the workplace, and work-related social events etc.).</li> <li>▶ GBVH outside of work hours (e.g. by email, text messages)</li> <li>▶ Inclusion of all workers, full- and part-time employees, trainees, contractors, temporary workers.</li> <li>▶ Covers third parties e.g. from customers, clients.</li> <li>▶ Addresses domestic violence, including GBVH / violence and abuse from current and ex-intimate partners in the workplace.</li> </ul>
<p><b>3. Assessing risks of GBVH: a focus on prevention</b></p>	<ul style="list-style-type: none"> <li>▶ Implement a gender-inclusive and transformative approach to identifying and assessing risks of GBVH, and to locate this in the framework of occupational safety and health.</li> <li>▶ Recognise that GBVH is both a hazard and risk at work that leads to stress, and physical and mental ill-health.</li> <li>▶ Gender-responsive risk assessment is carried out, and inclusive of workers' concerns.</li> <li>▶ Include all potential risks, including psychosocial risks arising from the organisation of work, discrimination/unequal power relations, work culture, work processes, production pressures, working hours etc.</li> <li>▶ The risk assessment identifies risks through a variety of sources, including sensitive consultations with women workers e.g. confidential surveys and interviews, women's safety walks, focus group discussions etc.</li> <li>▶ The supplier in consultation with workers (and if relevant with union representatives) draws up a comprehensive plan to prevent and end GBVH in the workplace.</li> <li>▶ The prevention plan takes into account the outcomes of a workplace risk assessment, measures to mitigate risks identified e.g. training, information and awareness raising, implementation of effective policies and procedures.</li> </ul>
<p><b>4. Workplace committee to prevent and address GBVH</b></p>	<ul style="list-style-type: none"> <li>▶ Establish a workplace committee with gender balanced membership, with representation from workers/trade union and/or at least one gender expert.</li> <li>▶ Committee's roles include monitoring implementation of this policy, overseeing risk assessments/safety audits, prevention initiatives and awareness/training, and handling complaints and investigations.</li> <li>▶ Committee members receive training on their roles and guidance on how to oversee prevention programmes and the handling of complaints.</li> </ul>

Suggested themes to cover in a policy	Good practice guidance
<p><b>5. Encourage a culture of confidential reporting and disclosure of GBVH</b></p>	<ul style="list-style-type: none"> <li>▶ Victims and survivors are encouraged to confidentially disclose GBVH. There are multiple routes to report concerns and make complaints.</li> <li>▶ Victim and survivor-centred approach to safety and support measures.</li> <li>▶ A system for confidential anonymous complaints and systems for learning from and identifying patterns of GBVH arising from anonymous complaints.</li> <li>▶ Training on appropriate communications, listening and skills of empathy, including relevant information about specialist services in the community.</li> </ul>
<p><b>6. Grievance procedure: handling complaints</b></p>	<ul style="list-style-type: none"> <li>▶ The complaints procedure is fair, understandable, transparent and trusted by all workers, as well bystanders and witnesses.</li> <li>▶ Complaints can be made confidentially through multiple routes.</li> <li>▶ Suppliers, in collaboration with brands, should consider different routes for making complaints, e.g. via trade union representatives, shop floor representatives, directly to managers/HR, community-based grievance systems, or via an independent external mechanism.</li> <li>▶ Early detection and intervention of problems / early resolution of complaints is prioritised to prevent incidents arising in the first place.</li> <li>▶ The complainant gives informed consent and information is provided at each stage of the complaints handling process.</li> <li>▶ There is a right of appeal for complainants and alleged harassers.</li> <li>▶ A complainant has the right to withdraw their complaint at any stage of the proceedings. However, this will not apply in serious cases where there are potential risks for other workers, or where other workers have been affected.</li> </ul>

Suggested themes to cover in a policy	Good practice guidance
<b>7. Objective, fair and transparent process for investigating complaints</b>	<ul style="list-style-type: none"> <li>▶ There is an effective and confidential system for handling complaints, including formal and informal resolution, independent investigations, are in place.</li> <li>▶ Complaints are handled fairly and without preference given to higher-status and higher-value employees.</li> <li>▶ When formal procedures are followed, an independent investigation will be carried out, taking account of the situations of vulnerability and risks faced by women workers.</li> <li>▶ Allegations of GBVH will be dealt with seriously, fairly and confidentiality.</li> <li>▶ Investigators are independent and have expertise in handling investigations of GBVH. The investigator has clear terms of reference and reporting to the Committee.</li> <li>▶ The complainant and the accused both have the right to representation by a trade union, friend, colleague or lawyer.</li> <li>▶ If a complaint is upheld, the alleged harasser has the right to appeal.</li> <li>▶ In serious cases where a crime has been committed, cases will be referred to the police for criminal prosecution, in consultation with and with the consent of the complainant.</li> </ul>
<b>8. Confidential workplace advocates / shop floor monitors</b>	<ul style="list-style-type: none"> <li>▶ Each workplace will have a named workplace representative, advocate or shop floor monitor, who will provide confidential support and information for workers; they are nominated in consultation with management, workers and/or trade union.</li> <li>▶ Workers can report concerns or cases of GBVH to the representative, advocate, or shop floor monitor, who will take the issue to management anonymously on their behalf.</li> <li>▶ Training is provided on how to identify GBVH, provide confidential information, advice and support for victims and survivors.</li> <li>▶ Their names and contact details of advocates / shop floor monitors are publicised.</li> </ul>
<b>9. Promote active bystander approaches in the workplace</b>	<ul style="list-style-type: none"> <li>▶ Encourage and support managers, supervisors and workers to take on the role of active bystanders, including training, by challenging practices and cultures in the workplace that contribute to GBVH.</li> <li>▶ Ask managers, supervisors and workers to ‘take a stand against GBVH in the workplace’.</li> <li>▶ Provide training and advice for workers about engaging in safe practices and for managers, supervisors and workers on behaviour change.</li> </ul>

Suggested themes to cover in a policy	Good practice guidance
<b>10. Non-discriminatory recruitment and promotion procedures</b>	<ul style="list-style-type: none"> <li>▶ Transparent and non-discriminatory recruitment and promotion procedures are drawn up and implemented.</li> <li>▶ Gender-neutral interview questions and no questions that are perceived to be quid pro quo GBVH.</li> </ul>
<b>11. Training of managers, supervisors and workers</b>	<ul style="list-style-type: none"> <li>▶ Training is provided for managers, supervisors and workers on GBVH, including handling of complaints and drawing up prevention programmes.</li> <li>▶ Training contributes to raising awareness about how to create a safe working environment for all workers, and how to change organisational culture that contributes to GBVH.</li> <li>▶ Emphasis should be given to culture change in the workplace and to having the processes in place to both prevent GBVH and address incidents of GBVH.</li> </ul>
<b>12. Information and support</b>	<ul style="list-style-type: none"> <li>▶ Information is accessible and widely disseminated about the business policy and complaints procedures, and how a victim or survivor can access support, raise a concern and lodge a complaint.</li> <li>▶ Support is provided inside and outside the workplace when GBVH has occurred. This can include legal, social/psychological, medical and financial support, and is paid for by the supplier.</li> <li>▶ Advice, information and signposting will be provided about specialist organisations working on GBVH.</li> <li>▶ Adjustments in work schedule, work tasks or work location, and if necessary, the provision of shorter/flexible working hours and/or paid leave, will be offered to enable a worker to recover from the effects of GBVH.</li> </ul>
<b>13. Awareness raising in the workplace</b>	<ul style="list-style-type: none"> <li>▶ Hold regular awareness raising and information campaigns in the workplace on GBVH and how it can be prevented. Where possible partner with local and national NGOs.</li> <li>▶ Workers, supervisors and managers are encouraged to discuss what is appropriate behaviour and language in the workplace, and contribute to creating a respectful, safe and inclusive working environment.</li> <li>▶ Display signs to that effect on notice boards and newsletters in the workplace.</li> </ul>

Suggested themes to cover in a policy	Good practice guidance
<b>14. Perpetrator accountability</b>	<ul style="list-style-type: none"> <li>▶ There is a consistent approach to holding perpetrators accountable and no protection or special treatment will be given to ‘high value’ or senior managers.</li> <li>▶ Sanctions are issued that are proportionate to the severity of the case and can result in verbal and written warnings, and dismissal.</li> <li>▶ Perpetrators are provided with information and signposting to perpetrator counselling and support services.</li> </ul>
<b>15. Implementation, review and monitoring of the policy</b>	<ul style="list-style-type: none"> <li>▶ A timeframe is set for the review of the policy e.g. annually. Amend, if relevant in line with best practice developments.</li> <li>▶ Consult with workers about the policy and how it has been implemented.</li> <li>▶ Confidential gender-disaggregated records will be held and reviewed on complaints and concerns from workers, bystanders, witnesses, whistleblowers, and the outcomes.</li> </ul>



## Policy appendix: Definitions

<b>Gender power relations</b>	How gender shapes the distributions of power at all levels of society, including in the workplace.
<b>Gender-based violence and harassment (GBVH)</b>	<p>Gender-based violence and harassment is violence and harassment “directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment” (Art. 1(b) ILO Violence and Harassment Convention No. 190).</p> <p>GBVH can be physical, verbal, sexual, psychological and economic. Examples include sexual harassment, sexual violence, sexual exploitation and abuse, and domestic violence when it impacts the workplace.</p> <p>Women are disproportionately affected by GBVH, but it is important also to recognise that LGBTIQ+ and gender nonconforming workers may be targets of GBVH, including discrimination, homophobia and transphobia.</p>
<b>Gender-responsive risk assessment</b>	Gender-responsive means that a gender perspective and gender specific differences and inequalities in the workplace are addressed in risk assessment.
<b>Psychosocial risks</b>	Psychosocial risks are occupational risks that affect the physical or mental health of an employee; they include stress, violence and harassment, gender-based violence and harassment.
<b>Risk</b>	Risk is the probability (likelihood) that a hazard will actually result in injury or disease/illness or damage to property, equipment or the environment, together with an indication of how serious the harm could be, including any long-term consequences.

## Policy appendix: Definitions (continued)

### Sexual harassment

Sexual harassment is the most frequently experienced form of GBVH in the at work. It involves unwelcome verbal, non-verbal and physical conduct. It forms an important part of the ILO Violence and Harassment Convention No. 190 and Recommendation No. 206. In addition, sexual harassment is a form of sex discrimination under ILO Convention No. 111 on discrimination in employment and includes: “quid-pro-quo” (a condition for a job) and “hostile work” (intimidating, hostile or offensive working environment). Convention No.111 is a fundamental right at work.

Examples of sexual harassment:

- ▶ Unwelcome sexual advances, propositions or demands for sexual favours
- ▶ Derogatory comments or nicknames about clothing or appearance
- ▶ Repeatedly requests for a date or drink and/or to engage in sexual activities
- ▶ Intrusive questions or suggestions about a person’s sex life and discussing their own sex life
- ▶ Comments of a sexual nature about a person’s sexual orientation or gender identity
- ▶ Blocking promotion or training because unwelcome sexual advances are turned down
- ▶ Leering, suggestive gestures and remarks or jokes
- ▶ Sexually explicit posts and rumours on social media, via text or email
- ▶ Displaying or circulating offensive material, pornographic pictures or calendars
- ▶ Physical contact e.g. invasion of personal space and unnecessary touching, hugging or kissing
- ▶ Sexual assault, indecent exposure, stalking

### Victim/survivor

The policy refers to victims and survivors in order to recognise different definitions used in laws and in practice where workers may be victimised and/or who survive GBVH. The term survivor is increasingly used to give agency to someone affected by GBVH and points to the possibility to survive abuse. Women are disproportionately affected by GBVH, but it is important also to recognise that LGBTIQ+ and gender non-conforming workers may be targets of GBVH, including discrimination, homophobia and transphobia.



### Policy appendix: Definitions (continued)

<p><b>Workplace / world of work</b></p>	<p>▶ The workplace includes all places where work is conducted, in the office, work from home and in remote locations. The definition of the “world of work”, as embodied in the ILO C190, recognises the different places where work is carried out: “(a) in the workplace, including public and private spaces where they are a place of work; (b) in places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities; (c) during work-related trips, travel, training, events or social activities; (d) through work-related communications, including those enabled by information and communication technologies; (e) in employer-provided accommodation; and (f) when commuting to and from work.” (Article 3).</p>
<p><b>Risk assessment</b></p>	<p>A process for identifying, assessing, controlling and reviewing occupational safety and health risks in the workplace.</p>
<p><b>Intersectionality / multiple discrimination</b></p>	<p>Overlapping and intersecting forms of discrimination against persons on the grounds of sex, racial or ethnic origin, religion or belief, disability, age, sexual orientation, gender identity or other characteristics.</p>
<p><b>Perpetrator</b></p>	<p>Someone who commits an act of violence, abuse or harassment.</p>

## Case study: H&M Guideline on GBVH

H&M has developed a global supplier Guideline on GBVH that outlines minimum requirements and provides recommendations, as well as a practical framework for supplier engagement and support. The Guideline forms part of the revised 2024 Global Framework Agreement and was jointly developed by H&M and global unions. As a starting point, H&M provided training for country-based social sustainability teams and National Monitoring Committees, supported by tools for suppliers on prevention and grievance handling.

The GBVH Guideline is directed at all H&M suppliers. It outlines clear expectations based on ILO Convention No. 190 and draws on international good practices for prevention, detection, investigation, and case handling. It groups requirements and recommendations into three core pillars: prevention, investigation and case management, and monitoring and control systems. All production units must have a GBVH policy, with a recommendation that this be developed jointly with worker representatives and relevant experts. Additional guidance covers awareness raising, training and onboarding, risk assessment, and follow-up.

In 2023, the Guideline was made available to all production sites in 12 languages, it was published on the Supplier Portal and presented through online meetings. Implementation focused on high-risk countries and large or high-risk factories, each of which developed a long-term action plan with progress and impact reviewed regularly. In 2024, H&M and trade unions jointly selected 20 factories employing around 30,500 workers and conducted gap analyses against the Guideline to identify priority areas for improvement. The Guideline has since been integrated across all relevant supply chain actions. For example, under the Textile Industry Coalition (TiC), a multi-stakeholder project addressing sexual harassment and violence was launched in India, involving brands, manufacturers, government agencies, trade unions, civil society organisations, and research institutions. The initiative has supported 13 production units across Tamil Nadu, as well as related community programmes in six districts.

H&M systematically tracks implementation and outcomes. Overall feedback has been positive: grievance mechanisms have improved and risks are being identified more effectively, for example, through safety walks. However, challenges remain in ensuring that all suppliers recognise GBVH as a priority issue and prioritise prevention. A key learning is that preventing GBVH is a long-term, ongoing process, and impact can be challenging to measure. Progress has been achieved because the Guideline is not intended as a compliance audit issue; instead, it is designed to guide suppliers, build capacity and awareness, and strengthen long-term engagement through training, e-learning and supportive tools.