GAIA principles: Frequently Asked Questions

The GAIA principles are a framework for all businesses to address the root causes of GBVH in commercial agricultural and fishery supply chains. They apply to all businesses in their own operations and supply chains, covering employment, purchasing goods, and procuring services.

They are intended to create alignment between businesses, and with other relevant stakeholders, to support unified and collaborative efforts to promote respectful workplaces across a sector and address systemic risks. They prevent duplication by establishing a common framework and reference point for businesses working with other businesses. The principles seek to foster dialogue and build trust between supply chain partners, between businesses and workers, and with wider stakeholders as a starting point for action.

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For human rights,
for better business

Clarification of scope and key terms based on ILO Convention 190 (C190)

1. What is meant by GBVH?

Violence and harassment in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are

likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.

Gender-based violence and harassment means 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 (ILO C-190).

With reference to sexual harassment, this can be further understood in line to the as:

Quid pro quo – Any physical, verbal or non-verbal conduct of a sexual nature and other conduct based on sex affecting the dignity of people, which is unwelcome, unreasonable, and offensive to the recipient; and a person's rejection of, or submission to, such conduct is used explicitly or implicitly as a basis for a decision which affects that person's job; or

Hostile work environment – Conduct that creates an intimidating, hostile or humiliating working environment for the recipient.

As part of the ratification of ILO C-190, States are obligated to "define and prohibit violence and harassment in the world of work" through national legislation whereby GBVH maybe further defined according to the cultural context.

2. Who is covered by this definition?

Workers and other persons in the world of work, including employees as defined by national law and practice, as well as persons working irrespective of their contractual status, persons in training, including interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants, and individuals exercising the authority, duties or responsibilities of an employer.

3. In what context does this apply?

Violence and harassment occurring in the course of, linked with or arising out of work such as:

- In the workplace, including public and private spaces where they are a place of work;
- In places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities;
- During work-related trips, travel, training, events or social activities;
- Through work-related communications, including those enabled by information and communication technologies;

- In employer-provided accommodation; and
- When commuting to and from work, in transport provided by the employer.

Understanding the GAIA principles

4. Who are the principles meant for?

The GAIA principles apply to **all** businesses - across own operations, the supply chains, and broader business relationships. All businesses may increase the risk of GBVH through action and inaction, and infringe on the rights of workers, including contract workers, workers in the supply chain, communities where the business operates, and those who use their or are impacted by their services (security, warehousing).

The principles are intended to encourage collaboration through a recognition of shared responsibility to address GBVH across the supply chain (for example, buyers, suppliers, producers), without disproportionally transferring risks and costs to partners.

Shared responsibility in this context refers to buyers, suppliers, and other business partners taking joint responsibility for preventing, addressing, and remedying risks and impacts of GBVH, rather than placing the burden on a single party.

Businesses should refer to these principles when recruiting and employing workers and when purchasing goods and services from other businesses to ensure everyone is on the same page and understands what it will take to address GBVH. Workers, trade unions and other civil society organisations can use these principles as a basis to engage businesses on solutions and accountability.

5. What makes this different from a code of conduct?

Codes of conduct are typically developed by businesses, like retailers and brands, and shared with suppliers. They tend to be one-directional in their communication and application and are often framed as a compliance exercise: suppliers are asked to sign them and may or may not receive further training or guidance. Codes of conducts generally do not set out any commitment from a buyer.

These principles, however, have been co-developed with a range of representatives from business and civil society (trade unions and non-governmental organisations), government and multilateral institutions and initiatives, to create alignment between stakeholders for the effective prevention of GBVH in the workplace, through shared responsibility and collaboration across the supply chain.

6. Are these principles standards or minimum requirements?

No, standards and minimum requirements are often monitored or assessed through a social audit and do not leave room for discussion and collective action. These principles, on the other hand, are a framework to enable alignment between business partners, businesses and workers/their representatives/trade unions and other stakeholders, to address the root causes and consequences of GBVH in the workplace through collaboration and collective action. More importantly, they emphasise the need for workers to be at the centre of GBVH prevention efforts, through freedom of association and social dialogue.

7. **Can ETI provide a checklist or set of activities for suppliers to use?**

ETI has not developed a checklist or set of activities because the aim is for the principles to guide discussion and subsequent action by supply chain stakeholders in consultation with workers and their representatives. Outlining a set of activities for one category of stakeholders (e.g. suppliers) in isolation of understanding the responsibilities and actions of others is not conducive to effective or meaningful implementation of the principles.

What is strongly recommend is that businesses assess the risks of GBVH in their own operations with workers and their representatives/trade unions, and possibly gender experts, and in their supply chains, with these stakeholders and suppliers/producers. Risk assessments should be followed by the development of strategies and plans to tackle GBVH with business partners and with relevant input from workers (the Principles include actions for engagement with workers and their representatives/trade unions). This should include consideration of the context/scenario, size of business and complexity of supply chains (and the business relationships). These strategies and plans should clearly articulate the roles and responsibilities of different supply chain partners.

How to use these GAIA principles

8. Which business activities are most pertinent in perpetuating the risks of GBVH?

Businesses primary activities of concern with respect to the risk of GBVH are:

- **Employing workers**, which includes recruiting and hiring, and substantially controlling working conditions (hours, pay, health and safety) and managing their labour (discipline, supervision, direction), including that of contract and indirect workers, to produce[1] goods (e.g. agricultural products) and services (e.g. security, cleaning, transportation).
- **Purchasing goods** (e.g. placing orders) **that are produced by workers** including goods not for re-sale.
- **Purchasing services that are delivered by workers**, **and/or are done to workers** delivered on behalf of businesses . These include services such as recruitment, cleaning, security, logistics and warehousing.

9. Where should a business start with implementing the GAIA Principles?

Every business in the supply chain has a responsibility to address GBVH. This responsibility should be shared and upheld at all levels, not pushed down to lower-tier partners. Therefore, the best place to start is with dialogue - with supply chain partners and workers and their representatives/trade unions to understand what GBVH means within own operations and in their supply chains, where the greatest risk lies, in terms of severity (including irremediability) and scale.

It is also important to have joint understanding with business/supply chain partners of what the principles mean and how to collaborate in implementing them, to determine roles, responsibilities, and areas for further support. This understanding should be grounded in meaningful engagement with those who are affected by and are at risk of GBVH - workers, especially women - trade unions, individuals and organisations with expertise in GBVH. This process should inform action plans that are designed and implemented with workers, validated and monitored by workers and their representatives.

See questions 14 and 15

[1] Produce used in the broadest sense of growing, harvesting and processing commodities for sale.

10. How can a business unlock resources internally to support implementation of the principles?

Effectively preventing and responding to GBVH requires a collective effort, including fairly sharing costs and resources. Businesses can use these principles to coordinate their actions, combine resources and avoid duplication of efforts. As an individual business looking to unlock resources to support implementation of the principles, it is important to engage senior leadership (see Principle 3) and develop the business case for addressing GBVH alongside other risks, recognising that addressing GBVH risks effectively may yield direct business benefits, such as increased productivity and fewer legal and reputational risks.

11. Who should pay for the costs of programmes designed using the GAIA principles?

Like other human rights initiatives, the costs of programmes (i.e. investments) should be absorbed into the cost of doing business and reflected in the prices of final goods and services produced, which is fairly shared as across the supply chain. Costs should not be disproportionately borne by lower-tier supply chain businesses.

Businesses should consider supporting partners to make investments and creating economies of scale by collaborating with peers and supporting sector wide initiatives. For example. retailers can pool funds and resources and support tier one suppliers to strengthen their GRHRDD and/or fund training to a number of growers in a region.

12. What should a business do when they have seasonal supply chains and where they have low levels of leverage?

As with any potential adverse human rights impact, businesses can increase leverage through responsible purchasing practices if leverage is required with suppliers of goods and services, and pre-competitive collaboration with sector peers, which could be done via employer associations, multi-stakeholder initiatives and industry bodies. Additionally, where relevant, businesses are also advised to engage with buyers (retailers, packers and exporters/importers) who may lend support and influence.

The Principles were developed to support greater alignment within and across commercial agricultural and fishery sectors. We recommend that businesses use the fact that these were co-

created by business, trade unions and NGOs to legitimise requests and to signal the direction of travel and change in industries, e.g. towards strong gender responsive human rights due diligence.

Seasonality of product doesn't necessarily need to equate to seasonality of employment. Business should take every effort to structure their operations in a way that enables permanent, stable and regular employment. Where seasonality is unavoidable, the seasonal nature of employment should not put workers at heighted risk of GBVH, this applies to the way workers are recruited as well as what is asked of them during the course of their contract.

13. How should retailers and brands use the GAIA principles?

The motivation for creating these principles came in part from a desire to create a unified framework that felt relevant and inclusive in its formulation and that embedded a commitment to jointly addressing issues and promoting rights. Responsibility to address GBVH in the workplace should be shared and upheld at all levels, not pushed down to lower-tier suppliers.

There is an expectation that buying companies, and especially those selling the final product to consumers, do not simply pass the principles and responsibility for implementing them to their suppliers and expect resolution. They must actively lean into the process, assess the role and impact they have, and jointly define what is needed from them and what actions they should lead and support, to ensure sustainable and impactful change is realised.

Suppliers should not feel they must deliver the principles in isolation and should expect support from their customers, in the spirit of shared responsibility. Just as the process of developing the principles themselves, supporting tools and resources, actions and implementation should remain tripartite (company-trade union-NGO collaboration).

Shared responsibility and collaboration

14. What is the role of a business to prevent GBVH when it employs workers?

All businesses employ workers and therefore have a duty to:

- Provide safe workplaces free from GBVH by developing and implementing inclusive policies and procedures on prevention of GBVH in the workplace
    - This includes recruitment, which is free from any GBVH, and efforts to address the root causes of GBVH and reduce the vulnerability of workers.
- Ensure protection from third-party perpetrators e.g. labour recruiters, security services
- Enable safe reporting and victim/survivor-centered remediation
- Hold perpetrators accountable regardless of seniority

Businesses should follow a gender responsive human rights due diligence approach, starting with a clear policy and commitment. See Q9 for additional content.

We have shared links to a number of helpful resources that support businesses with human rights due diligence on the topic of GBVH specifically.

15. What is the role of a business to prevent GBVH when it buys products or services?

Safeguarding human rights and preventing GBVH across the supply chain requires that all relevant supply chain actors collaborate, share resources and work in partnership to fund agreed interventions. Buyers have additional responsibilities to:

- Conduct gender-responsive human rights due diligence (HRDD) of their supply chains, including assessing the risks of GBVH
- Engage in meaningful and open dialogue with workers/their representatives and suppliers that enables a better understanding of risk and incidents, as well as develop collaborative solutions that take into consideration the roles and actions not only of partners but of buyers too.
- Support workers' rights, including the right to freedom of association and collective bargaining that enables negotiation of specific measures to prevent GBVH and create safer workplaces.

- Embed joint expectations to prevent GBVH in purchasing contracts and agreements with supply chain partners.
- Share responsibility for prevention, mitigation, and remediation of GBVH with supply chain partners.
- Provide financial and technical support where necessary
- Recognise and reward supply chain partners that are transparent and implement responsible practices that prevent GBVH.

16. How can businesses support partners, such as producers and growers, to implement the principles?

Every business in the supply chain has a responsibility to address GBVH. This responsibility should be shared and upheld at all levels, not pushed down to lower-tier partners.

As a business partner, you have a responsibility to support partners in lower tiers of the supply chain to safeguard workers and ensure workplaces are free of GBVH. How you support them will very much depend on the context, the nature of your business relationship and the level of understanding of GBVH risks. For example:

- You can support business partners in fulfilling their responsibilities to prevent and respond to GBVH through, for example, contributing to the costs and investments needed for prevention programmes, as well as through offering guidance, access to support, knowledge sharing, upskilling and capacity building.
- It is also important to clarify any expectations about the management of GBVH and engage in a discussion to understand what needs partners have to meet this.You can also '*lead by example*' by adhering to the principles in your own operations and ensuring that as a business partner you can speak from experience and demonstrate action is being taken at all levels of the business.
- Leadership can also take the form of ensuring responsible purchasing practices that do not perpetuate the risks of GBVH in the supply chain, as well as transparency with partners on successes and challenges.

17. What is freedom of association and why is it important?

Freedom of association and collective bargaining are **fundamental** human rights, which means that they apply in all contexts, regardless of local law. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

When workers, particularly women and LGBTQI+ people, understand their rights and can organise, they create trusted avenues to raise concerns and seek remedy. Organised workers, with strong representation and leadership from women, can negotiate improved terms and conditions, including specific measures to address GBVH in collective bargaining agreements (CBAs). In turn, employers are supported to create safer workplaces.

Workers should have the freedom to choose how they organise for collective representation. Businesses should recognise and engage with independent trade unions, which are the most effective and legitimate form of worker representation, rooted in freedom of association. Trade unions benefit from legal protections, resources, and autonomy from employer influence.

18. **Where unions cannot operate, or workers are not (yet) unionised or there are low levels of unionisation, how can business practically consult with workers on GBVH and still respect FoA and trade unions rights?**

Short-term actions can include:

- Support the next best form of independent worker representation, such as workplace committees or councils (where these are genuinely independent with democratically run elections) in the short to medium term. **These should not be used to substitute or undermine the formation of trade unions.** While these bodies can facilitate dialogue with workers on GBVH and make recommendations, they lack the legal standing, resources, and bargaining power of trade unions and cannot replace collective bargaining. Only trade unions can negotiate employment terms that include safeguarding obligations on equal footing with employers.
- Develop a working relationship with national unions and global union federations, such as the International Union of Food, Agricultural and Hospitality Workers (IUF) and International Transport Workers' Federations (ITF). These unions can provide advice and input, particularly at a policy level and national unions may be able to provide more context specific expertise. Multinational businesses can formalise this constructive relationship through Memorandums of Understanding and Global Framework Agreements thereby supporting an enabling environment for freedom of association and collective bargaining.
- Support policy and legislative reforms that recognise and uphold the rights of all workers, including migrant workers and those in the informal economy, to form and join

organisations of their own choosing, bargain collectively and participate fully in social dialogue mechanisms at all levels.

19. How can non-private sector actors engage with the principles?

Non-private sector actors like, trade unions, NGOs and multistakeholder initiatives can use the GAIA principles by raising awareness, building capacity, and as a framework for promoting accountability across the supply chain. They can support with training of workers and managers on key aspects of the principles, monitor implementation as independent observers, support survivor-centred grievance and referral systems, and convene multi-stakeholder dialogues for shared action.

Ensuring impact and change

20. What is the best way to monitor progress and effectiveness of implementation of GAIA related actions?

The GAIA principles have been developed with the aim of preventing GBVH in workplaces. Monitoring their implementation requires multiple approaches, some of which are listed below but all of which must heavily rely on the perspectives of workers and their representatives/trade unions:

- *Collective Bargaining Agreements* are the ideal worker-led monitoring mechanism. By virtue of the collective bargaining process workers are at the centre of solutions to prevent GBVH, become/are aware of the concrete safety improvements agreed with management which ensures a high level of awareness of GBVH preventative and mitigative measures. Via their trade union representatives, workers can raise concerns related to GBVH, and trade unions are able to proactively engage with union members and employers about the specific terms of CBAs.
- Other tools which can be used with workers include *participatory surveys* that are focused on workers' perceptions of safety and effectiveness of grievance/complaints mechanisms and remediation. This includes *participatory gender audits*[2] facilitated by independent gender experts that encourage dialogue with workers, supervisors and management on how GBVH is being managed in the workplace.

[2] A participatory gender audit is a collaborative assessment process in which employees, managers, and stakeholders work together to examine how well an organisation's policies, practices, culture, and systems promote gender equality by identifying gaps, biases, and practical improvements.

- Workplace committees (OHS committees, gender committees, internal complaints committee/anti-GBVH committees) comprising of worker representatives/trade union representatives, management and gender experts are used in many workplaces, often as a legal requirement. With guidance and appropriate training on GBVH and their roles, committees can monitor the implementation of policies and procedures including, overseeing risk assessments, prevention initiatives and awareness raising/training, and specifically in relation to GBVH, handling complaints and investigations.
- Specialist, in-depth assessments conducted by experienced gender experts can also support employers understand the strengths of their current policies and procedures and opportunities for improvement. Such assessments must be conducted with sufficient time and scope for gender experts to build trust with workers and to conduct interviews with workers and community members, where applicable, in safe and comfortable spaces (such as offsite locations) on interview participants on their own terms

21. What role do social audits and certification play?

Social audits can support the review of policies and certain practices, e.g. if there is a system in place to assess the policies of sub-contractors. However, they are generally ineffective in detecting GBVH and understanding GBVH risks due to the inherent limitations of audit methodology. For example,

- Audits provide snapshots of business practice gleaned over one or two days covering a range of topics of which GBVH may feature as one or two sub-topic questions under gender equality or OHS.
- Audits are structured with limited time for interviews with a limited sample of workers on-site that is not conducive to understanding workers' experiences in a meaningful way.
- Moreover, **workers are also unlikely to trust and disclose sensitive issues or concerns** to auditors who are effectively strangers to them. Workers may also fear disclosing issues in an audit for fear of the consequences, such as loss of orders (and therefore affecting their pay and jobs), losing their jobs or facing social ostracisation.
- Social auditors may not have the GBVH specialist knowledge or gender sensitive approach to adequately assess workplace policies or procedures and interview workers and management.

Certification standards often do not respond to the root causes that drive human rights risks. The effectiveness of certification schemes has been called into question "*by workers, their*

representatives, activists, and researchers, who argue that certification fails to address the root causes of poor working conditions and low wages".[3]

Several risks faced across food, farming and fishery supply chains are complex and endemic. They require collaborative and inclusive approaches, that enable workers and their representatives to help shape the design, implementation and enforcement of solutions. This is not something that certification has demonstrated an ability to facilitate. Further, as certification systems generally rely on social audits which fall short in monitoring the prevention of GBVH, certification on its own is not sufficient to prevent GBVH.

22. How do the principles align with the ETI Base Code?

The principles build on the ETI Base Code, specifically Base Code clauses 2, 5, 7 and 9, whilst providing further guidance on how to adhere to these Base Code requirements.

How were the GAIA principles developed?

23. How were the principles developed? Who was involved?

ETI engaged with representatives from 93 companies and organisations, including:

- workers, supervisors, managers from producers/growers
- trade unions, global union federation (International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF)), and International Trade Union Confederation (ITUC)
- suppliers (those that directly supply to retailers (supermarkets) and often import from producers/pack houses in sourcing/growing regions)
- retailers and brands
- producer associations
- multi-stakeholder initiatives

[3] Remi Edwards (2025) Banana workers' experience of ethical certification in Costa Rica. University of Sheffield. Available at: https://www.sheffield.ac.uk/sites/default/files/2025-02/ENG%20Remi%20Edwards%20policy%20brief%20FINAL%20online%20%281%29.pdf

- NGOs
- consultancies
- academic researchers
- certification bodies
- international specialised agencies
- government

We initially agreed a sample of two supply chains with our ETI members to ground conversations: South African citrus, Kenyan tea and flower supply chains as they were important and strategic to members. These supply chains were not selected because they were seen to be particularly problematic – the risk of GBVH is widespread. We identified stakeholders based on our own existing networks and those of the working group and advisory group comprised of representatives from ETI member companies, NGOs and trade unions as well as academics and ETI member supply chain partners.

In a first round of workshop and engagements, we interrogated the root causes of GBVH and the need for principles and their content. We built on the vast experience of the collective contributors, discussed what had and hadn't worked, drew in lessons from several other initiatives to ensure we were building on good practice. We developed a draft set of principles based the content of these discussions, additional bilateral engagement and with input from our advisory group.

This set of principles was then shared with all participants from the first round of workshops. Participants provided feedback which informed discussions in a second round of workshops and additional focus group discussions and bilateral conversations. The finalisation of the principles was achieved with support from the advisory group, comprised of representatives from retailers, suppliers, academics, NGOs.

For more information see the GAIA principles briefing note and our initiative webpage.

24. How did ETI engage with relevant workers and survivors throughout the development of the principles? What safeguarding measures were in place?

Addressing GBVH in highlights the importance of businesses engaging meaningfully with stakeholders, specifically with victims and survivors and those who represent and/or work with them. Approaching GBVH prevention and response through collaboration with experts and those

responsible for implementation enables us to anticipate and address challenges in putting interventions into practice.

ETI (including our team of locally based facilitators in Kenya and South Africa) opted to invite organisations that worked with survivors and workers on GBVH and related topics, and workers' representatives, generally, trade unions, to workshops given that these were planned off-site in central areas and online.

Where we had the opportunity to visit producers and growers on-site, we conducted separate focus group discussions with workers and worker representatives. We were aware that given the high rates of GBVH, it is likely that workers will have witnessed, heard or experienced GBVH. We did not seek to ask any worker to disclose that they had experienced GBVH but did have procedures in place to ensure that workers could be referred on to specialist support if they indicated any upset or wish to do so.

All online workshop participants were reminded of resources to which they could self-refer should they have required specialist thematic support.

At no point during any workshop, focus group discussions or individual conversation did we ask stakeholders to disclose or discuss any instance of GBVH and sought to clearly set out the purpose of each engagement as part of the GAIA principle development process.

ETI shared a draft set of principles with individuals which attended workshops and facilitators returned to sites that hosted workshops in South Africa and followed up with the principles to gather feedback.