



Ethical
Trading
Initiative



GAIA principles

to end gender-based violence
and harassment in commercial
agriculture and fisheries

Contents

Find out more about the GAIA principles

About the principles	3
GAIA principles	7
1. All forms of gender-based violence and harassment are prohibited	8
2. Businesses commit to prevent GBVH and ensure their business partners do the same	10
3. Senior leadership considers the GBVH risk implications of all decisions to ensure workplaces are equal, respectful and free from GBVH	12
4. Policies and procedures are created and implemented to prevent GBVH in the workplace	14
5. Responsible purchasing practices enable action on root causes of GBVH and support sustainable production	17
6. Workers are employed in decent work through transparent decision making	19
7. Businesses enable workers to exercise their rights to and responsibilities in a GBVH-free workplace	21
8. All workers trust they can report GBVH confidentially or anonymously, without fear of retaliation	23
9. Businesses provide remedy of GBVH and hold perpetrators accountable	25
10. Businesses are accountable for GBVH and learn from GBVH risks and reports	27
Endnotes	28



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About the principles

Framework for action

These principles are a framework for businesses to address the root causes of gender-based violence and harassment (GBVH) in commercial agricultural and fishery supply chains, through individual and collective action. Grounded in existing international law and standards – including International Labour Organization (ILO) Convention 190,¹ the United Nations Guiding Principles on Business and Human Rights (UNGPs), Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises (OECD Guidelines) on Responsible Business Conduct, and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) – the principles **align businesses across supply chains on the key actions** needed to address GBVH, with the active support of trade unions and, where relevant, external stakeholders such as non-governmental organisations (NGOs).

They are intended to serve as a practical reference point for supply chain actors seeking to meet the Ethical Trading Initiative (ETI) Base Code and to conduct effective human rights due diligence (HRDD), making use of existing resources (see GAIA Frequently Asked Questions).

The need

GBVH is widespread and can be experienced by anyone, including men. However, it disproportionately affects women: nearly one in three women and girls aged 15–49 will experience gender-based violence in their lifetime,² excluding harassment. Certain groups of women and girls are at greater risk due to intersecting social characteristics such as sexuality, age, ethnicity, and ability.

GBVH is often driven by unequal power dynamics that are created or exacerbated by workplace practices. Workers are at greatest risk of GBVH when perpetrators know they will not be held accountable. In global supply chains, GBVH frequently goes unnoticed and unaddressed.



Definition: Gender-based violence and harassment

As per the International Labour Organization Convention 190 (ILO C190), Article 1, (a) the term “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; (b) the term “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.

Businesses are required under human rights guidance,³ and increasingly under mandatory legislation, to conduct thorough human rights and environmental due diligence (HREDD) to address⁴ risks, including GBVH. Addressing GBVH protects people's physical and psychosocial safety and security, whilst also enabling safer, more conducive workplaces that improve worker retention and productivity.

Yet, tools such as social and ethical audits often fail to identify GBVH or capture its scale. This gap poses risks not only to workers' human rights but also to businesses, including reputational damage, legal liability, and financial costs from ineffective or redundant efforts.

Given the complexity and widespread nature of GBVH, effectively preventing it requires collaborative approaches developed with rightsholders⁵ — particularly diverse groups of women and LGBTQI+⁶ workers, where contextually relevant — and their representatives, including trade unions.

Why principles?

Without a shared understanding and commitment from all businesses with their partners, efforts to address the root causes of GBVH will remain ineffective. These principles are grounded in:

Freedom of association and collective bargaining

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.



Critical point: Independent worker representation

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.

Where unions cannot operate or are absent, businesses should support the next best form of independent worker representation, such as democratically elected worker representatives in the short to medium term. **These should not be used to substitute or undermine the formation of unions.**

While these bodies can facilitate dialogue 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 on equal footing with employers.

Businesses should 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

Gender-responsive human rights due diligence (GRHRDD)⁷

Businesses should identify, prevent, and mitigate risks, and remediate harms that affect workers on the basis of gender, while monitoring and accounting for impacts of their actions. A GRHRDD approach recognises that gender intersects with other social characteristics, shaping workers' experiences differently, which needs to be taken into consideration when responding to workers' needs. This approach actively addresses root causes, including beliefs, attitudes and behaviours that perpetuate GBVH.

Accountability and prevention focused on stopping perpetrators

Victims and survivors⁸ are not responsible for GBVH. Actions should foster cultures of prevention and active bystander intervention, reduce risks by addressing enabling workplace practices and hold perpetrators accountable.

Victim and survivor centred approach

Decisions and actions should prioritise victims' and survivors' safety, needs and wishes from first report through to remedy. This reinforces workers' agency and centres workers in the decision-making process around prevention, protection and remedy, consistent with [meaningful stakeholder engagement](#).⁹

Who does this apply to?

- ▶ These principles apply to all businesses in their own operations and through their supply chain relationships.¹⁰ Businesses can affect the risk of GBVH both through action and inaction. They influence respect for human rights, including those of workers, contract workers, workers in their supply chain, communities where they operate, and those using or affected by their services (e.g. security, warehousing).
- ▶ The principles are intended to encourage collaboration and recognition of shared responsibility between supply chain actors,¹¹ including buyers, suppliers, and producers, without disproportionately transferring risks and costs to partners.
- ▶ The principles can serve as a basis for collaboration between business and civil society, especially trade unions and, when relevant, external stakeholders such as NGOs, gender experts and other civil society actors. The principles can help initiate and structure dialogue about working conditions, prioritise action and identify where civil society can support. Trade unions and NGOs can support in identifying and understanding risks, engaging effectively with workers and other rightsholders (e.g. community members) and co-designing and implementing effective solutions.

Scope of the principles

The principles do not prescribe a fixed list of activities for supply chain stakeholders, as appropriate actions are context specific and influenced by business size and supply chains complexity. Instead, they provide a framework for addressing the root causes and consequences of GBVH in the workplace.

In line with the UNGPs and OECD Guidelines,¹² business responsibilities depend on whether they cause or contribute to GBVH through their actions or omissions or are linked via business relationships.

Key activities of concern are:

- ▶ **Employing workers** – which includes recruitment, hiring, and substantial control of working conditions (hours, pay, health and safety), labour management (discipline, supervision, direction), for both contract and indirect workers producing¹³ goods (e.g. agricultural products) and services.
- ▶ **Purchasing goods** (e.g. placing orders) that are produced by workers, including those not for re-sale.
- ▶ **Purchasing services** that are performed by workers or delivered on behalf of businesses such as cleaning, security, logistics and warehousing.

All businesses have a responsibility to conduct GRHRDD to assess and address the impact of their activities on the human rights of workers and other stakeholders across the supply chain, including customers, the general public, and local communities where businesses operate. As part of the responsibility of businesses to respect human rights, they must also provide safe workplaces.

Businesses are encouraged to prioritise action where risks to human rights are greatest and where they can effect change and mitigate harm – GBVH being a critical example. These principles therefore apply to both to businesses' own operations and across supply chains.

As businesses are most likely to **cause** GBVH in their own operations, this should be a priority area for action, given their ability to bring about change by directly ceasing harmful practices or introducing mitigation.

Where the most adverse impacts on human rights with respect to GBVH arise outside their own operations, businesses are likely to fall on a spectrum between **direct linkage** and **contribution**. In such cases, their actions should focus on due diligence consistent with UNGP 19¹⁴ and are likely to relate to:

- ▶ **Ensuring coherence and alignment** of business activities (e.g. purchasing, contracting and responsible sourcing),
- ▶ **Ensuring expectations for safe working conditions** free of GBVH are clear and understood by business partners,
- ▶ **Sharing responsibility** with business partners through joint risk assessment, mitigation and remediation actions as per these principles,
- ▶ And finally **tracking progress and embedding learning** to better prevent GBVH.

GAIA principles



1. All forms of gender-based violence and harassment are prohibited



2. Businesses commit to prevent GBVH and ensure their business partners do the same



3. Senior leadership considers the GBVH risk implications of all decisions to ensure workplaces are equal, respectful and free from GBVH



4. Policies and procedures are created and implemented to prevent GBVH in the workplace



5. Responsible purchasing practices enable action on root causes of GBVH and support sustainable production



6. Workers are employed in decent work through transparent decision making



7. Businesses enable workers to exercise their rights to and responsibilities in a GBVH-free workplace



8. All workers trust they can report GBVH confidentially or anonymously, without fear of retaliation



9. Businesses provide remedy of GBVH and hold perpetrators accountable



10. Businesses are accountable for GBVH and learn from GBVH risks and reports



1 All forms of gender-based violence and harassment are prohibited

These are a range of behaviours directed at a person based on their sex or gender, including violence or threats of violence, and any physical any physical, verbal or non-verbal conduct directed at a person based on their sex or gender, which makes them feel uncomfortable, intimidated, offended or humiliated in their work environment or activities linked to work.¹⁵

We all have the right to work in safe environments, free from violence and harassment.¹⁶ Gender-based violence and harassment (GBVH) can affect people of any gender, and when it occurs, it often harms the physical and mental wellbeing of victims and survivors. To ensure workplaces are safe, employers have a responsibility to take action to prevent and respond to GBVH. Workers should feel safe to speak up without fear for their personal safety, job loss or other negative consequences. As well, safer workplaces support workers' wellbeing and productivity.

1.1 Clearly communicate zero tolerance¹⁷ for GBVH in the workplace¹⁸

- ▶ Refer to international standards and national laws, and local social norms, making clear that no one working for or linked to the business should experience or commit GBVH in the course of their work against workers or other rightsholders, including community members.
- ▶ Clearly communicate that this applies to all individuals including but not limited to job seekers and applicants, contract, sub-contracted, casual, seasonal and permanent workers, migrant workers, supervisors, management, senior management, owners and those acting as employers.
- ▶ Clearly communicate that GBVH committed by third parties, such as external contractors on site (e.g. security personnel), and recruitment agents and labour providers, is not tolerated.
- ▶ Establish clear codes of conduct and expectations for professional behaviour in the workplace along with additional risk mitigation measures in situations that may create risks, such as personal relationships between managers/supervisors and workers.¹⁹ Measures may include mandatory confidential disclosure requirements, tailored to the social and cultural context.
- ▶ Discuss specific policies with worker representatives/trade unions, NGOs, gender experts with localised knowledge, and where appropriate, community members.²⁰



Definition: Worker(s)

“Workers” refers to all individuals engaged in or connected to work, regardless of their contractual status. This includes employees at every level, from field to boardroom, as well as interns, apprentices, trainees, volunteers, jobseekers, job applicants, and those whose employment has ended. ILO Convention 190.



Definition: World of work

The “**world of work**” includes all places and situations connected to work. This covers regular workplaces (such as factories, offices, processing sites, fields and vessels); toilets, break and rest areas; work-related trips, travel to and from work, training, social events; work-related communications (such as email, text messages, instant messaging); and employer-provided accommodation. ILO Convention 190.

1.2 Engage with workers and affected stakeholders about what GBVH means to them

- ▶ Refer to national law and international standards²¹ and engage with workers and their representatives/trade unions to understand how GBVH is perceived, including examples of behaviours (not individuals) and workplace risks. Discussions should not ask workers to disclose if they have experienced GBVH. Disclosures of GBVH should be made through grievance mechanisms (see [Principle 8](#) ).
- ▶ Engage GBVH experts, such as specialist NGOs, to provide safe and respectful ways of engaging with workers, especially where migrant workers may face language barriers or cultural differences.
- ▶ Understand how GBVH impacts workers and reflect this in workplace policies, procedures and training. In contexts where community members are affected rightsholders, involve families, groups, and/or community leaders in discussions.

Examples of GBVH may include: comments, inappropriate jokes/banter, shouting, staring, rubbing, touching, pressing, actions that result in hostile work environments, sexting, watching pornography openly, sexual favours in exchange for jobs/more favourable work assignments/overtime/other benefits at work, unwelcome sexual advances, making suggestive gestures (e.g. miming sexual acts), abusing positions of power, humiliating others, sexual violence and assault, and more.

1.3 Co-create a culture of prevention and respect with workers

- ▶ Collaborate with workers, worker representatives/trade unions to define workplace values, behaviours and a culture that is respectful, ensures fair and equitable treatment, provides a safe environment, and encourages people to speak up if they experience or witness GBVH or inappropriate conduct.
- ▶ Embed this shared understanding into ongoing awareness and training activities (see [Principle 7](#) ) and revisit this with new workers in inductions.

2 Businesses²² commit to prevent GBVH and ensure their business partners do the same

They conduct gender-responsive human rights due diligence, promote collaboration and share responsibility, risks and costs fairly.

Safeguarding human rights and preventing GBVH across the supply chain requires cooperation among all relevant actors. Businesses must collaborate, share resources and, where necessary, jointly fund interventions and support. Each business has an *individual and non-transferable* responsibility to respect human rights. They should work with partners to conduct GRHRDD, mitigate GBVH and fulfil their responsibilities. When purchasing, businesses must promote collaboration and support partners – including service providers (e.g. cleaners, recruiters) and product suppliers – through responsible purchasing practices (see [Principle 5](#) ).

2.1 Share responsibility for preventing, mitigating and remediating GBVH

- ▶ Ensure business activities, including purchasing or providing goods and services, and employing workers (including recruitment), do not cause GBVH. Take all reasonable steps to prevent contributing to GBVH in operations and supply chains and remediate if this occurs (see [Principle 9](#) ).
- ▶ If linked to GBVH,²³ use leverage to ensure partners act and support them in fulfilling responsibilities. Support may include co-funding, guidance, knowledge sharing, upskilling and/or training.
- ▶ Ensure partners have effective HRDD systems to prevent and mitigate GBVH, rather than reacting to GBVH. Avoid a top-down approach and assess jointly *with* partners what support they need to conduct their own due diligence.



2.2 Collaborate and coordinate with other businesses

- ▶ Map key stakeholders along the supply chain, within and across sectors.
- ▶ Combine leverage and resources with peers to address systemic challenges, e.g. setting consistent expectations with labour suppliers to shift industry practice.
- ▶ Coordinate support to partners (e.g. suppliers) and cascade this across the supply chain to align responses to addressing GBVH systematically.

2.3 Collaborate with workers, their representatives/trade unions and other specialists

- ▶ Map key stakeholders from trade unions and NGOs, locally, nationally and internationally, especially those that are led by and for at risk groups (e.g. ethnic minority women, LGBTQI+ workers, migrant women). They can provide localised knowledge and can engage with workers safely and effectively.

2.4 Formalise collaboration through contracts

- ▶ Embed GBVH-related policies and mutual expectations into commercial contracts with business partners such as suppliers, service providers and labour intermediaries.
- ▶ Develop commercial contracts that enable cooperation on risk identification, prevention, and remediation, and require partners to cascade equivalent expectations to their own business partners through contractual clauses where appropriate.

In addition to commercial contracts, examples include:

- ▶ **Global framework agreements (GFA):** agreements between multi-national enterprises and global unions referencing international standards and ongoing collaboration to address labour rights issues, including GBVH.²⁴
- ▶ **Enforceable binding agreements (EBA):** interlocking agreements between business partners, unions, and NGOs, setting binding roles and responsibilities of supply chain actors for addressing GBVH.²⁵

2.5 Responsibly disengage, in consultation with workers, as a last resort

- ▶ Exhaust all efforts to use leverage with partners and apply other principles before disengaging. Business stability and job continuity provides the basis for improvement and remediation of GBVH.²⁶
- ▶ If disengagement is unavoidable, consult workers and their representatives/trade unions, and other stakeholders to assess the human rights impact, and plan to minimise harm.

3 Senior leadership considers the GBVH risk implications of all decisions to ensure workplaces are equal, respectful and free from GBVH

They consider the impact of business activities in their own operations and the supply chain.

Firm commitment from the top sends a clear message to everyone who works for or with the business that GBVH is taken seriously as a human rights and business risk.²⁷ Regardless of business size or supply chain position (producers, suppliers, buyers, contractors), owners and senior management are responsible for addressing GBVH by integrating it into risk management and decision making. Approaches may vary, but the goal remains the same: preventing GBVH and keeping workers safe.

3.1 Commit to creating safe and respectful workplaces

- ▶ Embed the commitment to prevent GBVH and work proactively with partners in a policy that clearly defines GBVH, sets expectations for all workers' and partners' conduct, outlines how GBVH will be prevented and addressed through related policies and procedures (see [Principle 4](#)).
- ▶ Articulate the business case for addressing GBVH alongside other risks, highlighting potential operational benefits such as increased productivity and reduced reputational risk.
- ▶ Communicate senior leadership's commitment internally across all business levels and externally to partners.

For example, commercial contracts can embed two-way expectations, defining responsibilities, and ensuring supplier accountability (see [Principle 2.4](#)).



3.2 Apply a gender — human rights lens to decision making

- ▶ Assess how business decisions affect the risk of GBVH and the ability to respect workers' rights and provide safe working conditions in own operations and the supply chain.

For example, consider how mechanisation may reduce jobs and increase the risk of GBVH in exchange for work, or how incentives and management Key Performance Indicators affect behaviour.

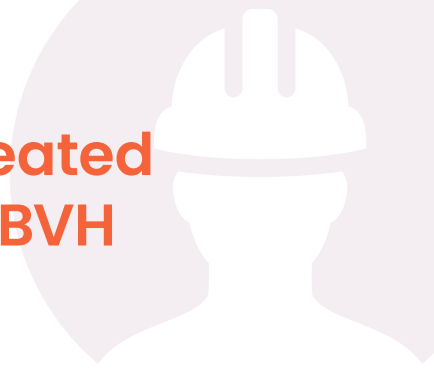
- ▶ Engage regularly and meaningfully with internal teams, workers and their representatives/trade unions and relevant external stakeholders²⁸ (e.g. NGOs, community leaders, women's rights organisations, gender experts) to understand the impact of business activities. See [Principle 10](#)  regarding monitoring and communicating progress in due diligence efforts to address GBVH.

3.3 Allocate sufficient budget and resources to address GBVH

- ▶ Budget for the cost of due diligence efforts including prevention and remediation, training for individuals responsible and/or hiring additional internal or external expertise, such as that of gender experts.
- ▶ Include these costs in the core business operating budget and/or product and service pricing.



4 Policies and procedures are created and implemented to prevent GBVH in the workplace



GBVH is a sensitive human rights and occupational health and safety (OHS) risk that can be hard to detect. Workers and other stakeholders such as communities understand the risks they face and how business activities may impact on their right to safety. Engaging with them, with additional support from local experts like trade unions and gender-focused NGOs, helps create solutions grounded in the social and cultural context of business operations. This approach ensures root causes, including power dynamics, are addressed, and actions are aligned with local laws and values, helping everyone understand their rights and responsibilities.

4.1 Engage with workers for a gender responsive and victim and survivor centric approach

- ▶ Develop and align policies and procedures with the strongest protections for workers from international standards or national law. Create separate policies and procedures or include GBVH into existing ones, and in unionised workplaces, develop CBAs that clearly state expectations for how GBVH should be addressed. Cover all due diligence steps and ensure inclusion of non-retaliation against victims and survivors, formal and informal grievance mechanisms, GBVH case handling, investigation, remediation and discipline.
- ▶ Develop policies and procedures (including on GBVH, recruitment/hiring, grievance, remediation and disciplinary) with workers and their representatives/trade unions.²⁹ Consider the views and experiences of those at greatest risk of GBVH based on the context such as women workers, especially those in relatively low positions of power, and LGBTQI+ workers.
- ▶ Work with supply chain partners and external stakeholders, like trade unions, NGOs and gender experts for input, guidance and training when developing and implementing policies and procedures.
- ▶ Consider the risk for retaliation outside of the workplace and address it in policies and procedures. Where needed, consult NGOs or community members to understand root causes and ensure culturally appropriate solutions.
- ▶ See [Principle 10.1](#)  regarding monitoring of the effectiveness of implementation with workers, worker representatives/trade unions and other stakeholders.

4.2 Assess GBVH as a workplace and OHS risk with workers

- ▶ Identify physical and psychosocial hazards and assess GBVH risks with workers, worker representatives/ trade unions, and workplace committees,³⁰ if they are in place, and other affected rightsholders, including communities, as applicable.
 - ▶ Support victims and survivors of domestic abuse where possible, including with referrals to specialist services and help to stay in work. As a form of GBVH, domestic abuse within families and personal relationships, may impact workers and their performance in the workplace. If perpetrators are also workers, they should be held accountable for any GBVH committed on business premises and with business property.
- ▶ Workers at risk of GBVH may include women workers, LGBTQI+ workers, migrant workers, temporary/ seasonal workers, contract workers, informal workers, young workers, workers with disabilities and learning difficulties, workers from non-dominant ethnic communities, workers who are not fluent in the main operating language (including that of management), workers from minority or marginalised backgrounds. Workers may experience multiple vulnerabilities such as being both a woman, migrant and temporary worker. Where employers provide accommodation to workers and their families, children and young people should be considered alongside workers at risk.
 - ▶ Hazards and risks that involve the following require particular attention: arising from **working conditions** (e.g. pressure to meet targets and deadlines, low pay, unstable availability of work) and **arrangements** (e.g. late shift patterns, lone working), **work organisation** (e.g. assigning tasks) and **human resource management** (e.g. recruitment, promotion, performance review, annual appraisals, awarding bonuses); **involve third parties** (customers, service providers, contractors and labour providers); and arising from **discrimination** (e.g. based on gender, ability, ethnicity, trade union affiliation etc.), **abusive power dynamics** (e.g. manager – worker, customer/buyer – supplier, recruiter – jobseeker), and **harmful gender, cultural or social norms** (e.g. normalisation of sexual violence, victim blaming).
 - ▶ Perpetrators may include colleagues, but especially anyone in a position of power or authority over a worker such as those recruiting (supervisors sent out to recruit, labour providers) or referring jobseekers (e.g. other workers from the same town), security guards, supervisors, line-managers, managers, accommodation wardens, and third parties such as clients, service providers.



4.3 Ensure transparency and accountability in worker-related decisions to reduce the risk of perpetrators committing GBVH

- ▶ Ensure decisions are transparent and based on objective criteria (e.g. gender neutral) and avoid concentration of power and authority in individuals without oversight.
- ▶ Use joint decision-making (e.g. committees) for high-risk processes like recruitment, promotion, and performance reviews.

4.4 Communicate and promote preventative policies and procedures to workers at risk

- ▶ Proactively use internal communications to encourage reporting and regularly engage with workers and their representatives/trade unions to assess understanding of prevention measures.
- ▶ Confirm at risk groups of workers (such as temporary workers, job seekers, migrants) are fully informed of grievance mechanisms, which should be designed to ensure confidentiality/anonymity, safety, support and protection from retaliation with accessible information provided during interviews, pre-departure training and inductions (see [Principle 7.1](#) ).

4.5 Engage with workers and other stakeholders about the implementation of relevant policies and procedures through regular training and monitoring

- ▶ Regularly train all workers, including supervisors and managers, on GBVH policies, reporting procedures, and consequences for violations, using accessible methods,³¹ including opportunities for reflection and feedback from workers.
- ▶ See [Principle 10.1](#)  regarding monitoring and evaluating the effectiveness of policies and procedures.
- ▶ Include community members in training on the GBVH policy and key procedures (recruitment, grievance mechanisms, remediation) where they are an affected rightsholder or key stakeholders (see [Principle 8](#)  on grievance mechanisms).



5 Responsible purchasing practices enable action on root causes of GBVH and support sustainable production

Purchasing practices impact working conditions across the supply chain. Prices below production costs can result in wage cuts or workforce casualisation to reduce businesses costs, placing workers in greater positions of vulnerability. Frequently this is gendered in process and impact, with men overrepresented in permanent and higher paid roles, and women overrepresented in entry level, casual and low paid roles, vulnerable to exploitation by perpetrators of GBVH.

Unrealistic order timelines can add pressure throughout the supply chain, placing pressure on management and supervisors that can result directly in GBVH or increase the risk, such as greater reliance on short-term, temporary labour solutions and excessive working hours to meet deadlines.

Responsible purchasing practices — through stable orders and fair prices that cover production costs — support decent work, reduce exploitation risks, and enable long-term investment in addressing the root causes of GBVH.

5.1 Review purchasing practices and the link to GBVH risk management as a business

- ▶ Commit to reviewing and improving purchasing practices in line with the Common Framework for Responsible Purchasing Practices in Food.³² Ensure all departments (e.g. compliance, human rights, commercial, legal) understand and address the links between purchasing practices and GBVH in a coordinated way.



5.2 Assess if commercial practices support sustainable production and contribute to decent work

- ▶ Assess if practices, including prices, allow partners to provide decent working conditions (e.g. living wages, job security) and meet environmental and social standards, engage in due diligence activities, including prevention.

Examples include asking specific questions as to whether the costs for prevention (training), mitigation (direct recruitment) and remediation have been included during price negotiations.

5.3 Consider supply chain partners' transparency and commitment to GRHRDD in commercial decisions

- ▶ Recognise and support partners investing in GBVH prevention with workers and their representatives/trade unions, considering this in sourcing decisions alongside other commercial factors.

For example, engage with business partners, workers and their representatives/trade unions and external stakeholders (such as NGOs) to evaluate the progress.

- ▶ Respond to honest disclosures of challenges (see [Principle 10.2](#) ) with support, fostering shared responsibility and recognising that sustained business stability enables partners to address GBVH.



6 Workers are employed in decent work through transparent decision making

GBVH often results from an abuse of power; frequently, in the workplace, this is an abuse of power by individuals in positions of authority (decision-making) and influence over hiring/recruitment, pay and working conditions of workers. Low pay and precarious terms of employment, or lack thereof, puts workers in greater positions of vulnerability, especially in areas with limited job opportunities where workers heavily depend on their jobs. Piece rate pay can motivate workers but also poses risks if targets are unrealistic, rates too low or pay calculations easily manipulated. Gender pay gaps can also increase GBVH risk, especially when women are concentrated in low paying roles and men hold decision-making power.

In contrast, **decent work**³³ provides protection and stability for workers, while ensuring their pay is sufficient to meet their needs thus reducing their vulnerability to GBVH.

See [Principle 5](#) for the role that business' purchasing practices play in enabling greater security and pay for workers specified in [Principle 5.2](#).

6.1 Recruit workers directly and conduct due diligence with labour providers/contractors

- ▶ Inform job seekers that GBVH is prohibited in recruitment. Follow transparent recruitment procedures (see [Principle 4.3](#)), and share grievance mechanism details in job advertisements, recruitment, onboarding process and pre-departure training.
- ▶ Where direct recruitment is not possible, take additional steps to manage GBVH risk, such as interviewing workers about their recruitment experience.
- ▶ During the procurement and contracting process with labour providers/contractors, engage these business partners on their recruitment practices and responsibility to prevent GBVH in their operations (see [Principle 2](#)).

6.2 Prioritise long term or permanent employment contracts

- ▶ Prioritise permanent employment contracts over short term/temporary/seasonal, casual or day work where possible.
- ▶ Take additional measures to control the risk of GBVH when short term/temporary/seasonal, casual contracts are used (see [Principle 4.3](#)).

6.3 Transparently decide workers' jobs, pay, incentives and promotion

- ▶ Reduce the opportunity for individuals to abuse positions of power and authority, and to rely on biases and assumptions when making decisions by adopting formal procedures (see [Principle 4.3](#)) related to a worker's employment and/or pay including: determining wages within transparent pay scales/grades, requesting overtime, awarding incentives, evaluating workers' performance and promotion, contract renewal or changes.
- ▶ Address gender pay gaps between workers performing similar work and between genders across the business through decisions based on objective, gender-neutral evaluation of skill and performance.

6.4 Work with workers and their representatives/trade union to set decent wage levels for all workers

- ▶ Engage with workers and their representatives/trade union to ensure all workers, including seasonal and casual, receive fair pay that meets their needs, ideally through free and fair collective bargaining.
- ▶ Take targeted action such as anonymous wage surveys and confidential focus groups with workers at risk of GBVH (e.g. women workers, migrant workers) to understand their views on pay with worker representatives/trade unions. Gender experts from the trade union movement and specialist NGOs can provide guidance and support to engage with workers.



7 Businesses enable workers to exercise their rights to and responsibilities in a GBVH-free workplace

Preventing GBVH requires a strong culture of fairness, equality and zero tolerance in the workplace. Workers should understand their rights and specific workplace policies, and feel empowered to report inappropriate behaviour whether directed at them or others as active bystanders.

Businesses' efforts with all workers, including management, should focus on: 1) supporting worker agency, 2) promoting gender equality³⁴ in the workplace, and 3) changing beliefs, attitudes and norms that underpin GBVH to address root causes of GBVH and build safe, respectful workplace cultures.

Cost sharing may be required. See [Principle 5](#) on the importance of purchasing practices, and [Principle 2](#) regarding shared responsibility.

Support workers' agency

7.1 Provide all workers with accessible information and regular training on their labour rights including freedom of association and collective bargaining

- ▶ Reference international standards (such as ILO C190), local laws and regulations to help workers understand the strength of protections and business obligations.
- ▶ To maintain workers' understanding, hold regular conversations and trainings on GBVH and expectations about behaviours, workers' rights, and business and workers' responsibilities (see [Principle 1](#)).

For example, incorporate reminders, review of concepts and brief discussions into regular OHS toolbox talks.³⁵

- ▶ Remove barriers to training participation and understanding.

For example, consider literacy levels, language needs and provide training within paid working hours.

- ▶ Proactively reach out to workers at risk, including migrant, seasonal, temporary and sub-contracted workers.

7.2 Ensure management capacity to engage in social dialogue with workers and collective bargaining with trade unions

- ▶ Train management on labour rights along with skills in communication, including active listening, negotiation and conflict resolution to support worker and trade union engagement activities.

Greater gender equality

7.3 Implement gender responsive actions to promote gender equality

- ▶ Collaborate with workers, their representatives/trade unions, NGOs and gender experts to create business initiatives to:
 - ▶ Champion gender equality, workers' rights (see [Principle 7.1](#)) and diverse women's leadership,
 - ▶ Actively support and promote the progression of diverse women.

Challenge beliefs, attitudes and norms that lead to GBVH

7.4 Engage with all workers, particularly men and those in authority, on GBVH and gender equality

- ▶ Create safe spaces for all workers to share views and challenge the beliefs, attitudes and norms that contribute to GBVH. Ground conversations in shared human rights values, such as a common belief in respect and dignity. If required, engage gender experts such as NGOs specialising with engaging men to directly facilitate or train trainers.
- ▶ Involve communities and local leaders where relevant as rightsholders and key stakeholders to ensure support and shared commitment to addressing GBVH.



8 All workers trust they can report GBVH confidentially or anonymously, without fear of retaliation

Grievance mechanisms³⁶ are central to addressing GBVH. All reports must be taken seriously and treated as if they have occurred. While grievance mechanisms alone cannot prevent GBVH, without a safe way to report issues, workers' rights are violated, and businesses cannot identify, remediate or prevent risks.

Grievance mechanisms' effectiveness relies on how workers and rightsholders, including communities, perceive mechanisms' safety, sensitivity, fairness and the likelihood that reports will lead to change.³⁷ Grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue,³⁸ which then becomes the foundation of trust. The following principles should be considered when designing and operating grievance mechanisms, following the UNGP and additional guidance.³⁹

8.1 Take all reports seriously and keep records

- ▶ Provide victims and survivors with informal and formal options for making a report.
- ▶ Assign trained, sensitive and independent case handlers to manage reports (informal or formal) in line with processes designed with GBVH experts (see [Principle 4](#) ).
- ▶ Trade union representatives/worker representatives or workplace committees,⁴⁰ if they are in place, can support with making fair, consistent and timely decisions and be highly effective in resolving complaints, and in sending a strong message that GBVH is not tolerated.

8.2 Respect victims and survivors' dignity, autonomy, choice and safety

- ▶ Clearly explain each step of the reporting, investigation and remediation process to those making a report (witnesses, bystanders, whistleblowers) and obtain their consent before proceeding to prevent unintended harm.
- ▶ Under no circumstances should the person reporting be persuaded to withhold a formal complaint. They must always have the option to pause or stop the process.⁴¹
- ▶ Allow victims and survivors to be supported by a person of their choice through the reporting and remediation (see [Principle 9](#) ).

Examples are a worker representative/trade union representative, colleague, friend or family member.

8.3 Ensure grievance mechanisms are independent and free from influence by alleged perpetrators or business interests

- ▶ Provide and communicate multiple formal and informal channels for workers and other affected rightsholders such as community members.

Alternative channels to workers' supervisors or direct line managers include trade union representatives, other workers/workplace monitors,⁴² trusted managers, human resource department, community-based grievance systems or independent external mechanisms.

- ▶ Regularly assess workers' and other rightsholders' views on grievance mechanisms' independence, safety and effectiveness through engagement with workers and their representatives/trade unions (see [Principle 4.1](#) and [10.1](#)). Community leaders, community-based NGOs, gender experts may offer support with engaging with other rightsholders.
- ▶ As per [Principle 2](#), supply chain partners can offer support to businesses to strengthen grievance mechanisms and coordinate these efforts with each other.

8.4 With the victim or survivor's consent, refer serious GBVH cases that may be criminal offences to law enforcement authorities⁴³

- ▶ Support the victim or survivor to access and understand information on criminal proceedings to make informed decisions about next steps.
- ▶ Offer the victim or survivor the option to continue with internal grievance processes without compromising the criminal justice process.⁴⁴



9 Businesses provide remedy of GBVH and hold perpetrators accountable

They take a victim and survivor centred approach and use fair disciplinary procedures with perpetrators.

All victims and survivors have the right to remedy. Remediation of GBVH should aim to restore the victim or survivor to a position in which they had been had the harm (GBVH) not happened. This may not be possible in the case of serious GBVH but should always be an aim and based on a victim or survivor centred approach.

Remediation also includes accountability and prevention, reassuring victims and survivors that the harm is acknowledged and should never be repeated.

9.1 Determine remedial actions with the victim or survivor

- ▶ Consider the safety, dignity, needs and wishes of the victim or survivor along with national laws and relevant business policies (see [Principle 4.1](#) ) when deciding remedy.
- ▶ According to a policy developed with relevant stakeholders under [Principle 4](#) , determine remedial actions by committee,⁴⁵ balancing the strict need for confidentiality and a need to know basis, with fair and transparent decision making.
- ▶ Engage with trade union representatives/worker representatives or workplace committees, if they are in place, to support fair, consistent and timely decisions. They can be highly effective in resolving complaints, and reinforce that GBVH is not tolerated.

Remedial actions for survivors can include apologies, access to psycho-social counselling, additional paid leave for recovery, transfer to another department, support with moving on to a new job (positive referral through business community), training, promotions (where workers meet criteria), employment, restorative justice (in collaboration with external specialists), and financial compensation.

- ▶ Keep confidential records detailing the rationale of decisions and actions taken in [Principle 9.3](#) .
- ▶ *As part of due diligence efforts, ensure business partners' remediation policies, along with other policy and procedures of their partners, align with ILO C190 and good practice, offering additional guidance and support as per [Principle 2.1](#) .*

9.2 Hold all perpetrators accountable for GBVH, regardless of seniority

- ▶ Apply sanctions proportionate to the severity of the GBVH case, following disciplinary policies outlined under [Principle 4.1](#) .

Sanctions include a range of actions from apologies and training up to dismissal. Financial penalties such as un-paid disciplinary leave, deductions, are expressly prohibited.

- ▶ Inform both perpetrators and victim and survivors of their right to appeal decisions, with the support of their trade union representatives or chosen supporters.

9.3 Demonstrate business responsibility and accountability

- ▶ Implement broader remedial actions that demonstrate responsibility and accountability to workers where the business has failed to prevent GBVH.

Actions may include changes to policies and procedures with input from the workers and their representatives/trade unions and GBVH specialists (see [Principle 10.1](#) ) and reporting back to the workforce about outcomes (see [Principle 10.2](#) )

9.4 Support victims and survivors to seek judicial redress if they choose

- ▶ Inform the victim or survivor that receiving remedy from the business does not affect their right to access formal justice.
- ▶ Provide full support and cooperation if a victim or survivor seeks formal judicial redress.

For example, provide information about the process (see [Principle 8.4](#) ) , assistance with complaints, finding legal aid and supporting in court.



10 Businesses are accountable for GBVH and learn from GBVH risks and reports

As part of their responsibility to prevent GBVH and conduct GRHRDD, businesses are accountable to workers and stakeholders, including boards and shareholders, for their actions and impacts. This includes transparently reporting about own operations and due diligence with supply chain partners. GBVH is complex. Businesses may not get things completely right the first time – seek lessons to improve and share these insights with other stakeholders.

10.1 Engage in monitoring, evaluation, accountability and learning with workers and their representatives/trade unions.

- ▶ Regularly monitor and evaluate GBVH prevention and response efforts within own business operations and supply chains with workers, especially women and LGBTQI+ workers, and their representatives/trade unions, and other external stakeholders (such as NGOs or independent gender experts) (see [Principle 4.1](#) ).
- ▶ Collect and review data on reports, incidence, risk assessments, NGO and trade union reports (e.g. sector reports), perception of safety and risk from workers at the workplace,⁴⁶ especially those at risk and gender experts.
- ▶ Evaluate the effectiveness of policies, procedures, including grievance mechanisms and training/awareness programmes, with workers and their representatives/trade unions, using opportunities to learn from reports, while respecting confidentiality, to prevent future incidents.

10.2 Report transparently to workers, their representatives/trade unions, and other stakeholders on risk, mitigation and remediation efforts

- ▶ Regularly report outcomes and learnings from grievance mechanisms and remediation to affected rightsholders, workers and their representatives/trade unions, and surrounding communities, if applicable,⁴⁷ while respecting case confidentiality.
- ▶ Collaborate with workers and rightsholders on solutions in response to findings as part of the learning process.

10.3 Share good practice and lessons with supply chain partners and peers

- ▶ Share challenges and lessons with business partners and peers to support collaboration in understanding systemic root causes and solutions.

Key resources on GAIA

- ▶ [GAIA principles overview](#)
- ▶ [Frequently asked questions](#)

[Find out more](#)

Endnotes

- 1 [International Labour Organization Violence and Harassment Convention, 2019 \(No.190\)](#) (C190) recognises the right of everyone to a world of work free from violence and harassment. GBVH risks should be incorporated in the management of occupational safe and health. It is the responsibility of states to reflect this into national law. By ratifying C190 (Article 4), states “shall respect, promote and realize the right of everyone to a world of work free from violence and harassment. [They] shall adopt, in accordance with national law and circumstances and in consultation with representative employers’ and workers’ organizations, an inclusive, integrated and gender-responsive approach for the prevention and elimination of violence and harassment in the world of work.”
- 2 World Health Organization, [Violence against women prevalence estimates, 2018 – Executive summary](#), p. IX. [accessed 22 September 2025].
- 3 United Nations Office of the High Commissioner for Human Rights (2011) [Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy Framework’](#). [accessed 22 September 2025]; Organisation for Economic Co-operation and Development (2018) [OECD Guidelines for Responsible Business Conduct](#). [accessed 22 September 2025]; ILO (2023) [Tripartite Declaration of Principles concerning MNE and Social Policy](#). [accessed 22 September 2025].
- 4 Address is used throughout this document to refer to human rights due diligence steps: identification, prevention, mitigation, remediation of the risk of GBVH and accounting (tracking and communicating) for actions taken by business.
- 5 Rightsholders refers to any individual or group whose human rights may be affected by businesses’ activities, products or services, such as local communities or family members who live with workers in employer provided accommodation on tea estates.
- 6 LGBTQI+ refers to Lesbian, Gay, Bisexual, Transgender, Queer, Intersex individuals specifically and ‘+’ refers to the additional identities individuals may use to describe their gender and/or sexuality. This should also consider gender fluid and gender non-conforming individuals. These workers may experience vulnerability to GBVH on the basis that they may not meet social and cultural expectations, norms and conventions, and many experience social, political and economic marginalisation.
- 7 For more information on gender responsive human rights due diligence see Office of the High Commissioner for Human Rights (2019) [Gender dimensions of the Guiding Principles on Business and Human Rights: Report of the Working Group on the issue of human rights and transnational corporations and other business enterprises](#). [accessed 23 September 2025].
- 8 The terms victim and survivor are used to ensure that these terms are recognised by individuals affected by GBVH and those working to support them. Practically, use of both terms continues in other standards and guidance. Context should determine what is appropriate, keeping in mind individuals who have experienced GBVH will have their own preference, which should be respected.
- 9 See ETI, [Meaningful Stakeholder Engagement \(MSE\) in HRDD: ETI position statement](#). (2025). [accessed 22 October 2025].
- 10 Businesses should consider the impact of their activities across the value chain, upstream (supply side) and downstream (how the final product reaches the end consumer). For example, workers employed by companies to promote their products in bars can face risks of GBVH. These principles have been co-created with supply chain stakeholders as the salient risk for GBVH in commercial agriculture and fisheries is in businesses own operations and supply chain.
- 11 Shared responsibility refers to a joint commitment by businesses in a business relationship to conduct GRHRDD as opposed to disproportionately transferring business risks and costs of GRHRDD onto suppliers.
- 12 United Nations Office of the High Commissioner for Human Rights (2011) [Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy Framework’](#). [accessed 22 September 2025]; OECD (2023) [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#). [accessed 23 Sep 2025].
- 13 Produce used in the broadest sense of growing, harvesting and processing commodities for sale.
- 14 See Principle 19 in United Nations Office of the High Commissioner for Human Rights (2011) [Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy Framework’](#). [accessed 22 September 2025];

- 15 See ILO C190, Article 1, a) the term “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; (b) the term “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.
- 16 This right is enshrined in [ILO Fundamental Principles and Rights at Work](#), [Convention on the Elimination of All Forms of Discrimination against Women](#) (CEDAW), [General Recommendations No. 35](#) and [19](#) to CEDAW, [ILO Convention 190](#) and [Recommendation 206](#) (R206).
- 17 Messaging about zero tolerance for GBVH incidences to business partners needs be done carefully. It is important to send a message to partners that transparency about reports and challenges is important. Partners may otherwise fear negative consequences for admitting there is a problem and reporting GBVH incidences. While the ambition is to prevent GBVH, it is widespread and will affect most workplaces. There should be zero tolerance for inaction by businesses to address GBVH.
- 18 The term workplace is used interchangeably with the ILO C190 definition of world of work. See text box in 1.1 for the full definition.
- 19 As well as other hierarchical relationships such as senior managers and managers, or managers and supervisors.
- 20 Civil society organisations led-by and for underrepresented groups – such as women-led trade unions or workers’ rights organisations specialising in women’s rights – can be highly effective partners.
- 21 Refer to the definition in Convention ILO 190, national legislation and business partners’ policies. Whichever definition offers the strongest protection should be used – where this is not clear consult with trade unions and GBVH experts.
- 22 This is not to be taken as referring only to retailers and brands. Any business within the supply chain that is procuring services or goods is acting as a buyer to another business acting as a supplier. Business should ensure heightened due diligence in those parts of the supply chain known to be of higher risk e.g. in the use of sub-contracting, labour providers etc.
- 23 Refer to Principle 13 of the UN Guiding Principles on Business and Human Rights.
- 24 See Hadwiger, Felix (2016) [Global framework agreements achieving decent work in global supply chains](#), ILO. [accessed 23 September 2025].
- 25 One of the first EBAs, The Fair Food Program, was established by the Coalition of Immokalee Workers that secured the commitment from retailers to exclusively buy from growers committed to respecting human rights including addressing GBVH. Examples of EBAs that have been used to specifically address GBVH in the apparel and textile sector are the [Lesotho Agreement](#) (2019), [Dindigul Agreement](#) (2022), [Central Java Agreement for Gender Justice](#) (2025) and [International Accord for Health and Safety in the Garment and Textile Industry](#) (now extended to GBVH).
- 26 In the majority of cases, an incident of GBVH does not warrant sufficient grounds for disengagement given the widespread nature of this challenge. However, there should be zero tolerance for inaction.
- 27 All businesses are responsible and accountable for the safety of their workers under international and national legislation. All businesses are responsible to respect human rights through their activities and business relationships. See UN Guiding Principles on Business and Human Rights, Principle 13.
- 28 This applies to all policies and procedures that relate workers and human rights.
- 29 In contexts where the workforce is not unionised, business can still consult with national or global unions and other stakeholders with expertise such as locally based NGOs.
- 30 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 implementation policies and procedures including, overseeing risk assessments, prevention initiatives and awareness/training, and specifically in relation to GBVH, handling complaints and investigations.
- 31 Taking into consideration cultural sensitivities, literacy and language barriers.
- 32 See ETI (2024) [Common Framework for Responsible Purchasing Practices in Food: Resilience in food supply chains](#). [accessed 17 October 2025].
- 33 Decent work is a key component of the Sustainable Development Goals (Goal 8) in which businesses play a critical role. It is defined as opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for all, better prospects for personal development and social integration, freedom for people to express their concerns, organise and participate in the decisions that affect their lives and equality of opportunity and treatment for all persons. More information [here](#) [accessed 23 September 2025].

- 34 Gender equality refers to the state by which all genders are able to access and realise their human rights without discrimination, by ensuring all genders have equal access to, and equality opportunities in political and public life, education, health and employment. Gender equity recognises that we may have different needs and face specific barriers according to our gender that require different measures or treatment to achieve the same outcome: respect and enjoyment of our human rights.
- 35 Toolbox talks are regular start of shift OHS briefings with workers. The point here is to integrate discussion of GBVH and more broadly shared expectations of acceptable and non-acceptable behaviour into regular communication. Communications can be short and frequent, covering different themes each time conversations are held with workers.
- 36 Grievance mechanism refers to the process by which reports are made and investigated. Remediation in these principles is considered separately. Businesses may take different approaches to organising guidance such as including disciplinary and remediation under a broader grievance policy – this is their prerogative. However, all policies and procedures should be clear to all workers.
- 37 ETI (2024) research in Spanish and Italian agriculture sectors found that: While grievance mechanisms exist in theory, they are practically inaccessible to workers in both countries due to workers' lack of awareness, low level of understanding of their labour rights, and direct employer control over existing channels creating fear of reprisals, p.15. ETI, [Grievance mechanisms in agriculture – Synthesis report](#) (2024). [accessed 23 October 2025].
- 38 Refer to UNGP Principle 31 for further detail on effectiveness criteria.
- 39 For example, ETI, [Recommendations for effective operational grievance mechanisms](#) (2024). [accessed 23 September 2025].
- 40 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 implementation policies and procedures including, overseeing risk assessments, prevention initiatives and awareness/training, and specifically in relation to GBVH, handling complaints and investigations.
- 41 Workplace and systems level responses, such as a review of procedures, may be able to continue without pursuing an individual's report.
- 42 Employers, in consultation with trade unions and worker representatives, may appoint other workers (e.g. worker representatives) who are trained to provide confidential support and information to workers.
- 43 At the time of drafting or reviewing policies and procedures, businesses should understand obligations to report suspected crimes, the nature of the criminal justice system, and the risk of revictimisation. Referring matters to law enforcement authorities may also serve as a deterrent to would-be perpetrators.
- 44 Whilst an issue might not be found to constitute a crime, a business may still find grounds for disciplinary actions according to internal codes of conduct.
- 45 By committee here refers to a decision making process that is done by a group rather than by one person.
- 46 Workforce surveys can be an effective tool for gathering information from a large sample but should not replace discussions with workers and their representatives/trade unions. For example, survey results should be discussed with workers.
- 47 This is important where businesses are embedded in local communities such as where they are large employers, provide accommodation to workers and their families, and work closely with community leaders and institutions for recruitment.



Ethical Trading Initiative

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Our vision is of a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse.



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