

Voluntary Principles
on Security + Human Rights

IGT Companion Tool

Operationalizing the Voluntary Principles
through the Lens of Protecting and
Respecting the Unique Needs and Rights of
Women and Other Disadvantaged Groups



About Stratos, an ERM Group Company

Stratos is a management consultancy specializing in environmental, social and governance issues. We work across the space between government, industry, Indigenous peoples and NGOs to collaborate and support them in developing the ideas, strategies and tools they need to solve large scale, non-linear, complex problems.

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About IMPACT

IMPACT transforms how natural resources are managed in areas where security and human rights are at risk. They investigate and develop approaches for natural resources to improve security, development, and equality. IMPACT is an independent non-profit, collaborating with local partners for lasting change.

www.impacttransform.org

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Foreword

Since their creation in 2000, the Voluntary Principles on Security and Human Rights (VPSHR or VPs) have become fundamental for many oil, gas and mining companies seeking to balance their need to ensure the safety and security of their operations and personnel while also respecting the human rights and fundamental freedoms of the people impacted by their operations. Companies in other sectors – including palm oil, agriculture and energy – have also begun to apply the VPs in their operations, given their applicability to a wide range of contexts where both security and human rights are at risk.

To help guide companies in their practical implementation of the VPSHR, an Implementation Guidance Tool (IGT) was created in 2011 with the support of the International Finance Corporation (IFC), the International Council on Mining and Metals (ICMM), the global oil and gas industry association for environmental and social issues (IPIECA) and the International Committee of the Red Cross (ICRC). The IGT is the most often used tool by member companies of the Voluntary Principles Initiative (VPI) and non-member companies alike. Its practical applicability has been found to be particularly useful for companies looking to operationalize the VPs within their day-to-day operations and overall company strategic and management approaches.

Since then, there has been increasing recognition that some people face particular barriers to exercising their human rights due to their sex, gender identity, age, ethnicity, religion, and other factors. The risk and impacts of human rights violations, broadly and linked to security in particular, are not felt equally by all. Some individuals, such as women, Indigenous peoples and children – are often at a heightened risk of

experiencing human rights violations. They also face a number of additional barriers to accessing the mechanisms meant to address these violations, such as company grievance mechanisms or judicial systems. Their exclusion or marginalization within VPs implementation – despite their unique and valuable knowledge, perspective and skills in understanding and addressing insecurity and conflict – can limit the effectiveness of the VPs.

While some country laws have evolved to increasingly recognize rights, such as through the adoption of the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP) or regulatory requirements for gender-impact assessments – some countries have seen rights regress, such as those of human rights defenders or members of the Lesbian, Gay, Bisexual, Transgender, Queer and Intersexed¹ (LGBTQI+) community. Further, while some companies are creating policy-frameworks and corporate cultures that promote equality, inclusion and safe spaces for all – implementation has been challenging. Companies operating in contexts with significant inequality risk further entrenching these inequalities via their actions (or non-actions), which can further contribute to a climate that is permissive of abuse against particular populations.

In response to this recognition, the VPI – supported by Stratos Inc., an ERM Group company and management consultancy, and IMPACT, a leading non-profit committed to improving natural resource management in areas where human rights and security are at risk – carried out analysis and research relating to the implementation of the VPSHR in a manner that is sensitive to gender and other inequalities or discrimination, and promotes greater accountability for the protection of women and girls, Indigenous peoples, human rights defenders, and other disadvantaged groups in the securing of company staff, operations, assets and work sites, including in conflict-affected settings.

¹ LGBTQI+ is the term used by the [United Nations](#), however it's important to note that there are various acronyms used to refer to different sexual orientations and identities.

This analysis and research informed the creation of this Companion Tool to the IGT, which provides companies with additional guidance on applying a lens to their implementation of the VPs that is responsive to the particular security and human rights needs of women and other disadvantaged groups. This includes the introduction of a number of important concepts, steps that companies can take to better identify and respond to potential risks and negative impacts that their operations may have on women and other disadvantaged groups, practical tools that can help operationalize the IGT and this Companion Tool, along with informative case studies, examples and links to additional resources.

While this Companion Tool to the IGT will help to operationalize the VPs through the lens of protecting and respecting the unique needs and rights of women and other disadvantaged groups, creating a corporate culture that prioritizes the rights of women and other disadvantaged groups is essential for ensuring a safe space that is conducive for these priorities to manifest themselves in the day-to-day operations of a company. This includes not only a work culture that is tolerant of differences, but also one that contributes to an environment where individuals – both staff and community members – feel safe in raising concerns and reporting incidents of wrong-doing.

Gender and Disadvantaged Groups – Sensitive Implementation of the VPs: Methodology

The project team completed this analysis and research in five steps. We first conducted a review of key literature sources and had informal discussions with knowledgeable individuals from a variety of backgrounds (including civil society, community-based organizations, human rights organizations, and the extractives industry) to inform project scoping.

We then distributed a survey to VPI Members observers of the VPI, and non-VPI Members of in-country working groups to understand the needs of VPI Members as they relate to human rights risks faced by women and other disadvantaged populations and to inform the recommendations provided to the VPI on opportunities to address the unique human rights risks faced by women and other disadvantaged populations, within the existing tools and resources of the VPI. We received 33 survey responses.

Following the survey, we conducted 12 in-depth key informant interviews with VPI Members observers, and the VPI and non-VPI Members of in-country working groups to further understand the human rights risks faced by women and other disadvantaged populations.

The insights from this data collection informed the development and subsequent application of a Diagnostic Assessment Tool used to assess where the unique needs of disadvantaged groups are addressed or not or could be within existing VPI tools and resources. We applied the diagnostic tool to the VPSHR Implementation Guidance Tool (IGT), the Voluntary Principles Training Course and the Child Rights Security Checklist and Handbook.

This analysis informed our recommendations to address identified gaps and the development of this Companion Tool to the IGT.



Understanding the Companion Tool

Introduction

The purpose of this tool is to provide guidance on implementing the VPSHR in a manner that is sensitive to the unique needs, risks, experiences and impacts that the security arrangements at oil, gas and mining operations can have on diverse groups of women, men and non-binary people whose identity factors (e.g., ethnicity, age, physical disability, etc.) may create a disadvantage to them in various ways. These groups of people, such as women, children, Indigenous peoples, migrants, ethnic minorities or other, live in contexts dictated by socio-cultural norms and rules that often discriminate against them to different degrees, often limiting their participation in processes and decision-making that affect their overall security and well-being.

The target audience of the tool is primarily individuals within companies or security providers who are responsible for or engaged in the design and/or implementation of security operations at oil, gas and mining sites. However, other implementers of the VPs – including governments, consultants, non-governmental organizations or observers – may also find it useful to reflect on their own role in ensuring that VPs implementation is more responsive to the experiences and realities of women and other disadvantaged groups, and contributes toward equality and human dignity of all, irrespective of their identity.

The tool is meant to be used either as an accompanying document to the Implementation Guidance Tool (IGT) for the VPs, or as a standalone resource. It has been divided into five specific modules:

- [Module 1: Stakeholder Engagement](#)
- [Module 2: Risk Assessment](#)
- [Module 3: Public Security Providers](#)
- [Module 4: Private Security Providers](#)
- [Module 5: Grievance Mechanisms](#)

This structure mirrors that of the IGT, with the exception of the module on grievance mechanisms which is cross-cutting. The Companion Tool does not focus on providing in-depth guidance pertaining to each potentially disadvantaged group that companies may interact with, but rather provides an overarching framework for companies to identify (in collaboration with communities) potentially disadvantaged groups and be responsive to these groups within the implementation of the VPs.

Where possible, we have drawn upon existing definitions, concepts, guidance, resources and tools that are publicly available, and which are either specific to the VPSHR or which can be adapted and applied to them. A number of other high-quality tools, guidance, and case studies about gender and disadvantaged groups exist, and we have included references and hyperlinks to these throughout this tool, and a full list is available in Annex A.

Important Context

The Evolution of Human Rights

The international human rights landscape continues to evolve from both a normative and legal perspective, as some governments and various international bodies move to further protect the human rights of various groups and individuals around the world. Human rights are a dynamic and evolving concept, requiring those responsible for protecting and respecting human rights to adapt as well.

Yet, in some contexts there have been attempts to reverse or limit previously recognized rights of people based on their identity, such as their ethnicity, religious affiliation, sexual orientation, or gender. Companies operating in these environments often face the complex task of respecting and safeguarding human rights.

Defining Disadvantaged, Vulnerable, Minority and Marginalized Groups

Several terms are used to identify groups of individuals that experience various forms of inequalities, prejudices, discrimination, harmful ideologies or stereotypes, and exclusion. These include disadvantaged, vulnerable, marginalized or minority groups, amongst others. The meaning of these words can vary amongst users, and different groups may have specific preferences with regards to how they are labelled.

Given that this tool considers a wide range of groups, there is no term that perfectly captures the context or preference of each one. We use the term 'disadvantaged group' to refer to groups of people that are at a higher risk of experiencing negative impacts stemming from the security provision at oil, gas and mining operations because of their susceptibility to experiencing systemic discrimination, racism, marginalization, exclusion, and other forms of inequities because of their identity and the power, norms, stereotypes, taboos and roles associated with it – either within their household, workplace or community. However, it is recognized that other terminology may be preferred, and as such have included additional terminology and definitions within the Glossary that companies may find useful.

Defining Intersectionality

The term intersectionality describes the way in which individuals can have several overlapping social identities that can operate together, and at times exacerbate inequalities and discrimination, to impact their everyday lives. Kimberlé Crenshaw, an American lawyer who first coined the term intersectionality in 1989, has said – “All inequality is not created equal.”²

Inequalities can compound. For example, inequality between men and women may mean that a woman from an ethnic minority group may experience higher levels of discrimination or bear the brunt of the impacts of that discrimination more than a man from that same ethnic minority. Women who are part of an ethnic minority and who identify themselves as part of the LGBTQI+ community may experience inequality and discrimination even more differently.

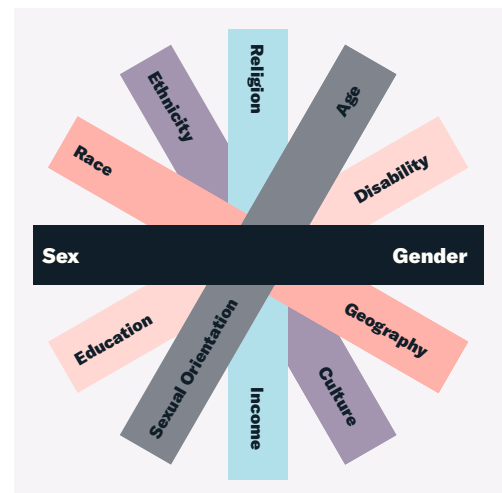


Figure 1: Identity factors considered in gender-based analysis plus (GBA+)

² <https://time.com/5786710/kimberle-crenshaw-intersectionality/>

³ <https://www.unhcr.org/gender-based-violence.html>

⁴ https://impacttransform.org/wp-content/uploads/2020/12/IMPACT-GIA-Toolkit_EN-2020_web.pdf (see page 2)



Gender-based Violence

The United Nations (UN) has defined gender-based violence as “harmful acts directed at an individual based on their gender.”³ Gender-based violence (GBV) often stems from entrenched gender inequality, the abuse of power and harmful norms or stereotypes that are indifferent, permissive or even encouraging of such acts. Acts of GBV can include “sexual violence (such as rape or sexual harassment), physical violence (including domestic), psychological or emotional violence (including threats, insults, harassment, exploitation, and intimidation), socio-cultural violence (discrimination, social exclusion or stigmas, political or religious marginalization), and economic violence (restricting access and control to financial resources).”⁴

While women and girls make up the majority of those who experience GBV, men and boys can also be survivors. Men and boys face their own unique set of impacts and barriers to reporting, including fear of stigmatization. Gender-based violence is also applied to instances where members of the LGBTQI+ community experience violence related to their non-conformance with traditional gender norms. Gender-based violence can have both immediate and long-term negative impacts. For example, survivors of sexual violence may experience immediate physical and mental harm as well as longer-term harms, such as the transmission of sexually transmitted disease, unwanted pregnancies, loss of livelihood or shelter related to stigmatization.

Women, Peace and Security

Globally, it has been recognized that women and girls living in conflict-affected areas, militarized settings and other high-risk environments (e.g., refugee camps) face a disproportionate risk of gender-based violence – and particularly conflict-related sexual violence – compared to men and boys. This recognition is encapsulated in UN Security Council Resolution 1325 (2000) on Women, Peace and Security which urges UN member states to take a variety of measures to both empower and protect women and girls in areas of insecurity, such as providing resources to ensure adequate training of security personnel, promoting increased participation of women in UN-field-based operations, as well as promoting women’s leadership and participation in peacebuilding and diplomacy efforts to resolve conflicts.



Principles to Guide Interactions and Relationships with Disadvantaged Groups

There are a number of key principles that companies should consider when creating and implementing various policies, processes and practices that relate to security and human rights in order to ensure that they recognize and respond to the unique experiences and realities of disadvantaged groups. These include:

- **Inclusive and Participatory:** Recognition that certain groups can face disproportionate barriers to participation in social, economic and political life – which are often linked to a person's social identity (including, but not limited to gender, age, race, ethnicity, or religion). Companies integrating an inclusive and participatory approach to the implementation of the VPs need to recognize and help dismantle – to the extent possible – these barriers in order to ensure that they are not contributing to or exacerbating exclusion of certain groups and are instead empowering greater participation of traditionally excluded groups.
- **Evolving and Continuous:** Recognition that inclusion is dynamic, and that companies will need to invest and adapt to dynamics as they evolve. Companies should nurture interactions and relationships with disadvantaged groups to ensure they are continuous and evolve over time – rather than only one-time engagements.
- **Representation of Interests:** Recognition that the need for companies to reflect on the extent to which different voices accurately and legitimately reflect the interests of disadvantaged groups.
- **Do No Harm:** Avoiding exposing people (especially already disadvantaged people) to additional risks or harms, and to avoid unintentionally exasperating current and potential conflicts, damage or suffering as a result of a company's actions.
- **Adaptive:** Companies should adapt their approaches to the local context and history, legacy or history of the site and ensure that approaches are culturally relevant and appropriate.

Leadership from the Top

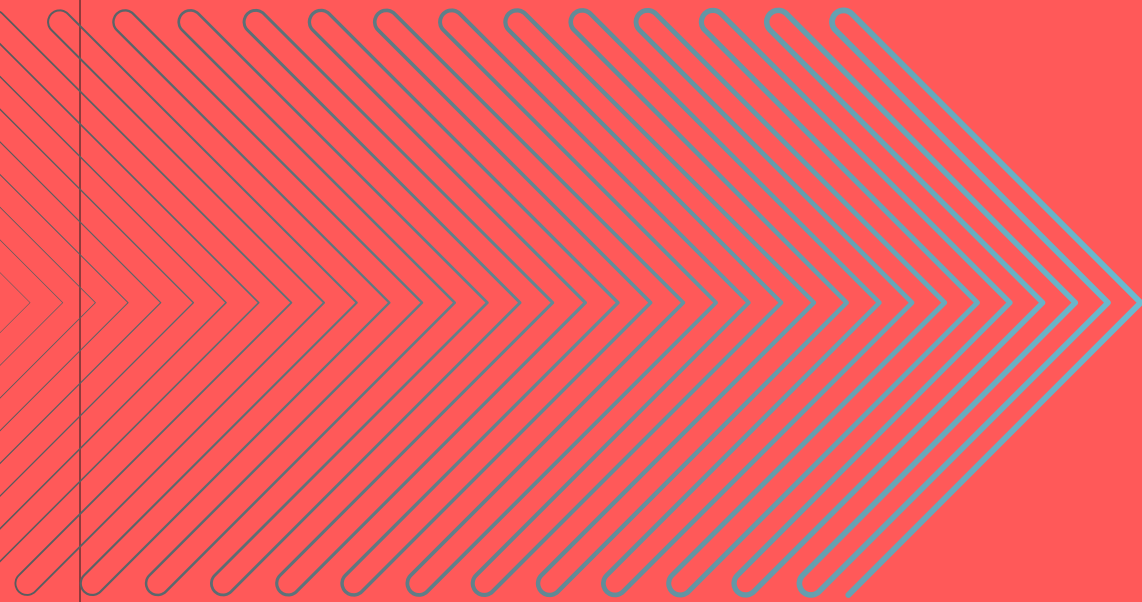
In order to create an environment and corporate culture that is conducive to inclusion, diversity and a respect for the rights of women and the disadvantaged, it is imperative that corporate leaders clearly articulate this in corporate policies and messaging at all levels of the company. This includes not only adopting specific policies, such as diversity and inclusion policies or anti-harassment and non-discrimination policies, but also embedding these principles and requirements within other company policies. A survey of VPI corporate members conducted to inform this tool showed that while many companies have adopted specific policies to promote inclusion and equality or to prohibit discrimination and harassment based on identity, less than half have integrated these principles and requirements into their security policies.⁵

⁵ The survey asked companies to identify particular policies that consider the potential adverse impacts on disadvantaged groups. Of 15 companies, only 3 noted that their security policy included such consideration.



Module One

Stakeholder Engagement



According to the IGT, stakeholder engagement forms the foundation of effective VPs implementation, cutting across a number of actions taken by companies to implement the VPs – such as conducting risk assessments or engaging with security providers. However, the status and position of women and other disadvantaged groups within their communities often leads them to be excluded, overlooked or ignored in stakeholder engagement processes. Furthermore, they often face systemic barriers that may limit or challenge their ability to effectively and equally participate in and benefit from stakeholder engagement.

This module provides guidance on how companies can incorporate and respond to the needs of women and other disadvantaged groups in carrying out stakeholder engagement within the context of the VPs. It is not meant to be a comprehensive set of guidance and tools for stakeholder engagement broadly, but rather is focused on guiding companies on how to identify and understand the unique realities of women and disadvantaged groups within the context of VPs implementation, how these can create barriers and challenges for engagement, and considerations for how these can be progressively overcome.

Objectives of Module 1

The Stakeholder Engagement Module helps companies:

- Define inclusive stakeholder engagement practices within the context of the VPs;
- Understand challenges facing women and other disadvantaged groups in stakeholder engagement and how these can be addressed; and
- Work with women and other disadvantaged groups on the implementation of the VPs.

This Module is composed of the following steps:

- Step 1.1: Identify and understand disadvantaged groups
- Step 1.2: Identify barriers to meaningful engagement with disadvantaged groups
- Step 1.3: Create a conducive environment for engagement with women and other disadvantaged groups

Considerations Before You Get Started

It is important for companies to have a clear understanding of the differences between rightsholders and stakeholders. While stakeholders are generally considered to be an individual or group that has a particular interest or potential to be affected by a project, rightsholders have specific rights that are enshrined to them. This is especially the case for women and other disadvantaged groups who have been afforded special rights and protection under national or international laws. An example of this is the *United Nations Declaration on the Rights of Indigenous Peoples*, which affords Indigenous peoples with particular rights related to consent – some of which are further domesticated into national laws.

United Nations Declaration on the Rights of Indigenous Peoples

The *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP) includes that Indigenous peoples have the right to free, prior and informed consent. Free, prior and informed consent is the most rigorous and intense form of engagement as it entitles stakeholders to determine the outcomes of decision-making that affects them rather than merely being involved in the decision-making process.



Stakeholder Engagement

Step 1.1 Identify and Understand Disadvantaged Groups

The first step to adopting a more inclusive stakeholder engagement process is to identify potentially disadvantaged groups and develop a better understanding of how gender and power dynamics within a community can shape the lives and experiences of stakeholders. For example, the power dynamics within a community may result in women and other disadvantaged groups being

less likely to participate in formal stakeholder engagement processes as they may not consider it to be their place to be vocal about their concerns or priorities. Consequently, companies may experience challenges in identifying certain disadvantaged groups as being particularly at-risk of security challenges and fail to integrate their unique perspectives within their VPs implementation (for more information on challenges to engaging disadvantaged groups, see Step 1.2).

Limitations of Standard Stakeholder Mapping Tools

Standard stakeholder mapping tools are often divided into four quadrants with the horizontal axis representing influence and the vertical axis representing impact. Companies often place an emphasis on the high influence/high impact quadrant followed by the high influence/low impact quadrant. As a result, the use of stakeholder maps typically results in companies engaging with formal representatives and powerful community members, as well as host government officials.

Disadvantaged groups may be overlooked in standard stakeholder mapping exercises that are based on influence, or else they may be identified, but not acted upon, because of their lack of influence. However, a rights-based perspective requires that priority be placed on those most at risk of negative impacts from the project. When using stakeholder mapping tools to identify disadvantaged groups, companies should pay particular attention to the high impact/low influence quadrant of the mapping tool. Companies should also involve stakeholders in designing or validating the processes and mechanisms for stakeholder mapping. This enables effective two-way communication, and ensures that the mapping exercise is customized to the needs and expectations of the affected communities.

Participatory Processes for Identifying Disadvantaged Groups

Identifying disadvantaged groups can be challenging, as they tend to be less visible in a community or less likely to have an organized or collective voice. To the extent possible and where appropriate, companies should use participatory processes that involve women and members of other disadvantaged groups within exercises to identify and map out the gender and power dynamics within their certain community. They are best able to identify their own points of vulnerability to specific security and human rights related risks and potential measures for addressing these if a conducive environment is created for them to do so. Where it is challenging to involve particular groups – whether due to language barriers, a lack of trust on the part of the group or concerns around anonymity – companies should try to identify potential individuals or organizations that may be able to offer particular insights or to support these groups to participate indirectly.

Representation and Diverging Perspectives

Disadvantaged groups are not homogenous simply because they share a particular disadvantage or vulnerability. There are many different points of view amongst women and individuals from disadvantaged groups, and as such the viewpoint of one individual or representative may not always align with the majority. This is especially the case where individuals or groups experience intersectional layers of disadvantage and exclusion. Companies will need to reflect on the diversity within these respective groups, and how this may impact the representation of particular groups. Scenario 1 provides an illustrative example as to how intersectional points of disadvantage may impact individuals with whom a company may be attempting to engage through their stakeholder engagement process.

SCENARIO 1: REPRESENTATION AND DIVERGING EXPERIENCES

Josephine

Josephine is gainfully employed full time and is a relative of the local traditional chief. Her employer permits her to take time off from work to participate in a company engagement session. Josephine does not have children so does not have childcare responsibilities preventing her from participating in the engagement session.

Giselle

Giselle is an Indigenous woman who sells vegetables at her local market. When not at the market, she cares for her children and relatives. Giselle cannot attend the engagement session unless she forgoes some of her days sales, is able to bring her children and/or secure childcare. Giselle also does not think her voice and concerns will be heard anyhow – though she has concerns over the potential displacement and infringement on her Indigenous cultural rights as well as the environmental impacts of the company's activities.

Identifying Sources of Discrimination, Vulnerability and Exclusion

There are a number of reasons for which individuals from particular groups may find themselves being discriminated against, including:

- Race and ethnicity
- Sexual orientation (e.g., lesbian)
- Age
- Disability/medical condition (e.g., HIV)
- Religion, faith and beliefs
- Gender and sex (e.g., woman, non-binary, etc.)
- Social, economic and political class
- Marital status or caring duties
- Nationality, immigration and citizenship status
- Physical characteristics and dress
- Language and culture

Systemic discrimination based on these factors can often manifest themselves in a number of disadvantages for individuals from these groups, including:

- Exclusion or limited participation in decision-making or governance structures
- Limited or unequal access to economic resources (capital, land, employment, income, etc.)
- Less access to knowledge and education (including literacy skills, schooling, knowledge tools such as the internet)
- Disproportionate household and workplace responsibilities (e.g., sole responsibility for household management, childcare, caring for elderly, etc.)

In addition to these, there are other individuals or groups of people who may find themselves vulnerable to particular risks and exclusion based on:

- Their involvement as human rights defenders (including those working to defend their natural environment, labour rights or women's rights)
- Their occupation (e.g., journalists), especially when working in the informal sector (such as sex workers or artisanal and small-scale miners)

Stakeholder Engagement

CASE STUDY 1

Engaging with Human Rights Defenders

The [Declaration on Human Rights Defenders](#) refers to “individuals, groups and associations...contributing to... the effective elimination of all violations of human rights and fundamental freedoms of peoples and individuals.” It is important to note that Human Rights Defenders (HRDs) are not inherently disadvantaged or vulnerable – in many cases, they hold positions of trust or authority within their communities. However, in certain areas – particularly conflict prone regions or countries with weak rule of law or corruption – HRDs may be more at risk of violence or harassment. These violations can become further aggravated when gender intersects with racial and ethnic discrimination. Companies will need to reflect on how they approach engaging with HRDs to ensure they do no harm. The case study below provides an illustrative example of how a company might attempt to engage HRDs through their stakeholder engagement process.

An Indigenous woman in Latin America is taking action against a local extractive company for human rights abuses. Her work includes gathering information on human rights violations, engaging and supporting survivors of human rights violations and speaking with the press about these issues. The company hears that she is also planning on hosting a demonstration in the coming weeks. Ahead of the demonstration, the company’s local liaison officer contacts her to set up a meeting to discuss the issues she has raised and to discuss potential solutions to the issues she is raising. She refuses to engage given her fundamental opposition and lack of trust for the company.

Subsequently, the company chooses to launch a multi-stakeholder initiative bringing together other extractive industry companies operating in the area, as well as local and national governments, civil society, and other stakeholders to establish a dialogue and a framework for addressing the issues raised by HRDs. This multi-stakeholder initiative works to build trust, common understanding and a constructive space for dialogue across all parties. The initiative establishes broader dialogue about risks in the area, roles and responsibilities of the different parties to address these risks and a framework to support preventive measures and to effectively address grievances when they occur.

For more information on concrete steps to ensure the protection of human rights defenders and the avoidance of the excessive use of force by security providers, including those linked to business activities against human rights defenders and social leaders, see [Toolkit for the Protection of HRDs](#) (available in Spanish).



As mentioned previously, stakeholder identification is a critical first step in stakeholder engagement and VPs implementation. Failing to recognize and engage disadvantaged stakeholders can lead to increased conflicts between companies implementing the VPs and local communities, as well as within the communities themselves (or exacerbate existing conflict), increased risks of adverse impacts on human rights and risks of further marginalization of disadvantaged groups.

Tool 1.1A

Identifying Disadvantaged Groups

Ask yourself...	Examples
Are there different ethnic groups that are present in the community/region?	E.g., within the region of the project there are different Indigenous groups, with different traditional governance systems
Have particular groups been identified as disadvantaged or as bearers of specific rights through national or international laws, domestic regulations, or government policies or plans?	E.g., refugees, children, Indigenous peoples, etc.
Are there particular groups within the country or project area that have been singled out or targeted by the government in a manner that is deemed to be restrictive of their rights?	E.g., laws restricting the freedom of association and unionizing; intimidation and threats to civil society
Are individuals within these groups organized, either formally or informally?	E.g., women's associations, trade associations/unions, formal or informal networks of human rights defenders
Are there individuals involved in income-generating activities within the vicinity of the project that have been highly affected or are considered more vulnerable due to particular dangers or their level of informality?	E.g., fisherfolk, artisanal miners, sex workers
How do formal/informal leadership or decision-making structures work in this area? Are they exclusive of particular groups, either explicitly or in practice?	E.g., women can participate in leadership structures, however they do so in small numbers
Is there significant income inequality between groups of people living in the community? Are these easily visible along particular lines (e.g., ethnic, religious, gender, etc.)?	E.g., nearby Indigenous population experiences high levels of poverty and economic marginalization (e.g., exclusion from trade, exclusion from wage earnings, etc.) compared to the rest of the community
Is there acceptance of fluid and evolving concepts of gender?	E.g., the local community has entrenched, traditional gender roles and identities, and is generally not receptive to individuals who are deemed to be acting in contradiction to these



Stakeholder Engagement

Step 1.2 Identify Barriers to Meaningful Engagement with Disadvantaged Groups

The discrimination, marginalization and exclusion that often faces women and other disadvantaged groups within all spheres of their lives can create significant barriers for them to be able to meaningfully and actively participate in stakeholder engagement processes, including those related to security and human rights. This can manifest itself in a number of ways, as outlined in the table below.

Table 1:

Exclusion or Marginalization Faced by Women and Other Disadvantaged Groups

Direct exclusion	Women or members of other disadvantaged groups are banned from certain or all stakeholder engagement activities (e.g., an engagement session with traditional authorities).
Indirect exclusion	Women or members of other disadvantaged groups are not directly banned but are not directly invited or actively encouraged to participate in engagement activities.
Exclusion due to practical barriers	Women or members of other disadvantaged groups are not able to effectively participate due to practical barriers they face in attending, such as the location of the activity (i.e., distance, cost of transport, etc.), timing of activity, competing priorities (i.e., household responsibilities, income-generating activities, childcare, etc.), and language barriers.
Limited participation due to unequal access to knowledge and information	Women or members of other disadvantaged groups are less able to participate and express their views and concerns during stakeholder engagement activities because they have less knowledge and information with respect to a variety of elements (e.g., the proposed project, their own rights, etc.). In addition, some may also feel a lack of confidence or capacity to speak their mind or share their views because of a sense of not having the right knowledge or expertise.
Limited participation due to fear of reprisals or stigmatization	Women or members of other disadvantaged groups may be less likely to attend (e.g., if a woman doesn't have permission from her spouse) or actively participate in engagement activities because they fear they may experience negative repercussions for voicing their opinions, especially if it counters a dominant narrative (e.g., a woman may experience domestic violence by the hand of a spouse if she expresses a viewpoint that is counter to his).
Limited participation or exclusion because of their views on the project	Some organizations or groups of people may be excluded from engagement activities due to their views opposing a particular project or practice by a company (e.g., human rights defenders, environmental activists, labour activists, Indigenous groups, etc.).
Refusal to participate	Some women and members of other disadvantaged groups may choose not to participate in engagement activities due to a lack of trust of the company and/or government (including public security providers).

Understanding, and considering, these challenges when designing and carrying out engagement processes ensures they are as inclusive and accessible as possible for disadvantaged groups. To better understand the potential barriers faced by women and other disadvantaged groups, companies can engage in exercises to map out gender and other power dynamics within communities. This exercise can help companies to better understand the economic, social, political (i.e., decision-making/influence) realities for different groups. Tool 1.2 provides a template that can be used to carry out such an exercise, which can be adapted to a number of different groups. In this particular example we focus on Indigenous women, but a blank template is available in Annex B. We recommend that, whenever possible, this exercise be conducted with representative individuals in the community, and via the use of small working groups.

Tool 1.2A

Mapping Power Dynamics⁶

Component	Suggested issues for analysis	Indigenous women
Governance and decision-making	<ul style="list-style-type: none">• Representation in formal decision-making structures (i.e., district, town, city, etc. defined in law)• Representation in customary or traditional decision-making structures (whether or not they are formally recognized in law)• Participation in informal/influential community organizational structures (e.g., committees, networks, etc.)	<ul style="list-style-type: none">• Indigenous women are not represented in municipal/district-level government; nor are there any Indigenous women who are traditional leaders.• Elder Indigenous women are more often consulted during decision-making processes, informally, and tend to have more clout because of the significance that the Indigenous populations place on respect and recognition of the knowledge of elders in the community.• There is an informal women's association that brings together women in the community; however, this association struggles to participate in local governance due to a lack of a representative in formal structures and limited means to support their development as an association.
Economic relations within the project area, institutions and at home	<ul style="list-style-type: none">• Common income-generating activities• Societal value attached to tasks performed by women and men (i.e., are tasks typically performed by women/men seen as more prestigious, important, necessary, etc.?)• Work profiles of men and women (remuneration, categories of employment, value of work, etc.)• Workloads for women and men• Location of the activity/task/work• Benefits of working in one location over another• Representation in industry/sectoral bodies (e.g., associations, networks, etc.)	<ul style="list-style-type: none">• Locally, Indigenous women do not engage in wage-labour but rather earn a subsistence living through small agricultural activity. Some Indigenous women sell excess production at the local market. This is compared to Indigenous men who have started to increasingly take up wage-earning jobs in different sectors over the last decade. As such, Indigenous men have significantly increased their access to cash compared to Indigenous women, who are very dependent on male relatives.• The women's work is carried out according to the seasons, depending on the time of ploughing, sowing, harvesting and selling at the market.• The project site has displaced some Indigenous families from their nearby lands to less fertile lands farther away, which has had an impact on the productivity of subsistence agriculture practiced by Indigenous women. The location of the project has also increased the distance to the local market, where some Indigenous women sell their excess agricultural production. As a result, this requires more effort for the women and more hours away from home as well as a decrease in income, which has created tensions with their husbands.• Indigenous women are disproportionately represented amongst sex workers in the area.• Indigenous women are not present in the industrial mining sector, though a small number have started to work in artisanal mining. This is primarily in support of their husbands or male relatives.• None of the mining associations at the local or national level include representation from Indigenous women.

⁶ Mapping power dynamics can be done primarily through consultation, but other sources of data could include household surveys/opinion polls, benchmarking, World Bank development indicators, Organization for Economic Co-operation and Development (OECD) Gender Data Portal indicators, etc.



Stakeholder Engagement

Component	Suggested issues for analysis	Indigenous women
Personal and family relations (including gender-related rules and norms)	<ul style="list-style-type: none"> • Access to and control of family and household-related resources, including income, land, information, time, places, and spaces • Roles in the household (e.g., workload, finances, etc.) • Relations between the couple, including tension and violence in the home • Social lives and networks of women and men at the household level • Management of and contribution to household money and expenses 	<ul style="list-style-type: none"> • Very few Indigenous women own the land on which they either live or engage in farming. Land is typically owned by their spouse (or, for young women still living with parents, their father). • Indigenous women are generally responsible for the vast majority of household tasks related to cooking, cleaning, maintenance and child rearing. • Many Indigenous women engage in more arduous household labour (e.g., fetching water, laundry, etc.) in the early hours of the morning in order to avoid the daytime heat. • The recent surge in cash income amongst Indigenous men in the community has caused tensions within couples. Indigenous women tend to have less control than men over the use of money brought to the household. • According to local human rights associations, the number of cases of gender-based violence against Indigenous women in the area is high. • Households are likely to include dependents beyond children, such as elderly grandparents or the children of siblings who require care, which places additional stress on Indigenous women and girls with respect to household duties.
Security	<ul style="list-style-type: none"> • Who is involved in providing security to local populations? • Who is involved in making decisions about security? • Who is involved in conflict mitigation/prevention efforts? 	<ul style="list-style-type: none"> • The regional police force in the area is responsible for security provision in the Indigenous community. The police force is predominantly men, though recently there have been several women officers hired. However, there are no Indigenous women or men on the police force. • There is poor oversight over regional police, and oversight mechanisms are absent of any involvement of Indigenous women or men. • Conflicts in Indigenous communities are generally resolved by the elders in the community as well as elected leaders. While the elected leaders are all men, it is customary for women elders to participate in conflict-resolution discussions. • Where conflicts between newly married couples occur, the dispute is often resolved by the husband's head of family. Younger Indigenous women are therefore often left out of the dispute resolution process.

From the power dynamics mapping analysis illustrated above, the following table highlights some of the key barriers and optimal approaches to the engagement of Indigenous women.

Table 2:

Mapping Power Dynamics Summary (Tool 1.2A)

	Key Barriers	Optimal Approach for Engagement <i>(*To be validated with Indigenous women themselves)</i>
Engagement Profile: Indigenous Woman	<ul style="list-style-type: none">• Many Indigenous women do not have access to cash that can facilitate their participation in relevant forums (e.g., bus, taxis, motorbike, etc.)• Carrying a larger household burden results in time constraints and certain periods of the day (e.g., early mornings when kids are leaving for school) that are less optimal for Indigenous women to be involved in engagement activities related to the VPs• Seasonality/harvest times can also impact women's ability to participate in any stakeholder engagement related to the VPs	<ul style="list-style-type: none">• Ensure engagement sessions are provided within adequate time and location conditions, for example close to households, near markets where women are exchanging goods, etc.• Where transportation is required, this should be provided directly and/or paid for• Provide small compensation for time• Provide multiple opportunities through the year for engagement



Stakeholder Engagement

Step 1.3

Create a Conducive Environment for Engagement with Women and Other Disadvantaged Groups

Steps 1.1 and 1.2 help companies map out different groups with whom the company should seek to engage with, as well as an understanding of potential barriers they may face. The third step in this module provides guidance on steps that companies can take to create a more conducive environment for engaging with women and other disadvantaged groups within the context of the implementation of the VPs. As outlined in previous steps, establishing a conducive environment for engaging women and other disadvantaged groups should be done in close collaboration with these groups – whether directly or indirectly via third-party support (e.g., a local organization or NGO).

Meeting Different Needs

Companies will need to be flexible and adaptive in the methods that they take when engaging women and disadvantaged groups that acknowledge some of the barriers and potential for exclusion identified in Step 1.2. Customized and context-specific approaches are needed in order to accommodate and include a broad range of groups and limit any potential exclusion.

Potential Accommodations

- Date/time
- Location
- Language/interpreters
- Group-specific activities or one-on-one engagements
- Supports (e.g., childcare, breaks and/or areas for breastfeeding, etc.)
- Logistical support (e.g., transport)

Considering Consent and Capacity for Engagement

Throughout this process, companies should consider the capacity of women and disadvantaged groups to be engaged in discussions related to security and human rights and identify ways in which the company can support the development of this capacity. This can include the provision of direct or third-party practical support (e.g., interpreters, translated materials, materials to engage with illiterate populations), knowledge building, technical support, legal support or other (e.g., experts in participatory methods or community-based methods that can support particular groups that may be less organized). Companies should also consult people on how they want to be consulted as part of these engagement processes. Addressing any barriers or considerations that should be made in order to ensure that any consent provided to participate in engagement activities by women or individuals from other disadvantaged groups is properly obtained and understood is important, such as consent for taking pictures, signing attendance lists, or other forms of information sharing.

Building Trust

Because of their marginalized position in society, many women and other disadvantaged groups experience greater levels of mistrust of both companies and government at various levels. Early and transparent engagement can help to mitigate potential build-up of mistrust, along with a genuine demonstration of intent to collaborate and co-design appropriate stakeholder engagement processes. This includes having clear procedural standards for engagement that include provisions around anonymity, privacy, consent, disclosure and information sharing. Additionally, it is helpful to streamline communication through one staff person (to the extent possible) in order to foster mutual trust and relationship building.

Validation

In order to demonstrate that engagement with women and other disadvantaged groups is meaningful, companies should provide the opportunity for these groups to participate in validation exercises to confirm a common understanding of the views and concerns voiced by these groups.

Respecting Local Norms and Customs While Promoting Equality and Inclusion

While it is important for companies to show respect and understanding of local norms and customs, such recognition should not stop a company from pushing back against norms and customs that are harmful to women and other disadvantaged groups. Companies should progressively challenge these norms and customs by identifying opportunities to question them and advocate for changes that promote equality and inclusion. For example, lack of representation by women and other disadvantaged groups at important meetings or consultations should be questioned and their participation advocated for. Further, companies should also consider how they can avoid further entrenching these norms. For example, if it is the norm for security-related issues to be dealt with by male leaders in a community without the involvement of women, and a company sends an all-male team of representatives to these discussions, it reinforces this norm.

Where norms are harmful and violate the rights of others (e.g., exchange of sexual acts in return for access to resources or a job), these should always be clearly denounced and prohibited.

Documenting Engagement Outcomes

Engagement can be more taxing on women and other disadvantaged groups because of the barriers they face to participate – such as potential lost time for income generation or potential for tension with other members of their household. Turnover of project ownership and staff can contribute to repetitive engagement, and increase this burden for women and other disadvantaged groups. To help avoid this, outcomes of engagement should be carefully recorded and documented, and shared or stored in an agreed upon manner. In some cases, it may be appropriate for this information to be made available publicly – in which case, this should be done in a manner that considers access for different groups (i.e., in what forms and languages, and how it is disseminated). In other cases, particularly with regards to sensitive

matters such as those on security and human rights, it may not be appropriate to share this information publicly, and companies should develop appropriate mechanisms for safely storing this information. Regardless of whether the information is made public or not, confidentiality of the participants should be ensured (unless individuals specifically consent to it being shared).

The Right Expertise

Companies should carefully consider what type of expertise is required when carrying out engagement with local communities related to security and human rights – especially when engaging women and other disadvantaged groups who may have suffered abuses in the past. For example, there is significant likelihood in post-conflict areas that a number of women and individuals from other disadvantaged groups have experienced traumatic incidents and abuses of their rights. In these contexts, engaging these individuals on sensitive issues such as sexual and gender-based violence may inadvertently lead to additional stress or re-victimization. It is important within these contexts that companies identify individuals with the right expertise and experience to support engagement within these particular settings.

Choosing Your Engagement Approach

Not only do companies need to engage with the right stakeholders, including disadvantaged groups, they also need to choose the engagement activities and mechanisms that will provide these groups with meaningful opportunities for input and two-way communication about the project. The nature of the VPSHR means that the content of engagement with various stakeholders – including disadvantaged groups – may be quite sensitive.

Engagement processes can be organized with individual groups, but often a workshop setting or public forum with multiple participants representing different groups and communities gathered at the same time can also be very effective. However, companies should ensure that disadvantaged groups receive sufficient attention by asking themselves questions such as:

- Who is setting the agenda and is it representative of the security needs and concerns of women and disadvantaged groups?
- Is the facilitator or moderator of the group inclusive in their approach (i.e., calls on various participants, allows equal time to speak, etc.)?
- Will the presence of certain participants limit the participation of others by making them less likely to speak up? In this case separate meetings might be needed, particularly in contexts where social norms may prevent effective participation of certain disadvantaged groups, or where the topic of discussion is especially sensitive.

Inclusive Communications

Stakeholder engagement, both within the context of the VPs as well as more generally in relation to company operations, requires a high-level of information sharing with different stakeholder groups. In doing so, companies should examine the ways in which women and other disadvantaged groups may share and receive information related to the implementation of the VPSHR in different ways. Such analysis can support a company to adopt multiple methods of information sharing and communication that is inclusive of a broad range of groups. Tool 1.3 below provides a set of questions that can guide companies in conducting a gendered analysis of communications for both women and men in the community. The tool can be applied either ahead of carrying out engagement on security and human rights in a community (e.g., at the initial stage of a project), or against an existing set of engagement methods being carried out by a company, in order to assess their gender-sensitivity. The tool can also be adapted to consider other disadvantaged groups, as well as gendered dimensions within those groups (e.g., Indigenous women and Indigenous men). The examples in the tool are based on a company applying it to existing methods used by the company.



Stakeholder Engagement

CASE STUDY 2

Independent Advisory Panel – bp Tangguh Project

The following case study illustrates how an independent advisory panel can be used to inform and enhance a company's human rights practices.

The Tangguh Independent Advisory Panel (TIAP) provides external advice to senior bp decision-makers regarding non-commercial aspects of the Tangguh LNG Project. The TIAP focuses on matters related to security, human rights, governance, revenue management, the political environment and the broader issues relating to how Tangguh affects the people of Bintuni Bay and Papua, including how the project is perceived by them. For example, given the work of bp and the TIAP, local north shore village leaders, who had voiced legitimate complaints, generally have a positive view of the Tangguh project's impacts on their villages.

The Panel monitors bp's programs and activities in relation to the most respected current global norms that establish best practice for projects in developing countries. These include the Universal Declaration of Human Rights; the OECD's Guidelines for Multinational Enterprises; the ILO Convention Concerning Indigenous and Tribal Peoples in Independent Countries; the World Bank Operational Directive with respect to Indigenous peoples; and the VPSHR. The Panel is also informed by global guidelines such as the UN's Guiding Principles on Business and Human Rights; the IFC Performance Standards on Environmental and Social Sustainability; and the Equator Principles.

The Panel reviews bp's social and environmental obligations under their environmental and social impact assessment. The Panel is granted complete access to all information requested from bp and total independence in its inquiries and findings. The Panel provides recommendations to bp and expects bp to conduct open meetings with interested parties to discuss their report and bp's responses.

For more information on the Tangguh Independent Advisory Panel, see bp reports [here](#)



Credit: (https://www.bp.com/en_id/indonesia/home/community.html#tab_external-monitoring)

Tool 1.3A

How do women and men share and receive security-related information at the operations site and in the community?⁷

Communication Method: Complete the exercise for each method of communication that is used by the company to inform communities regarding stakeholder engagement events/security issues.

Women

Men

*Consider how information is both shared and received

Radio

- Who tends to share information on the radio?
- When is information on projects and government programs shared?
- Is the information transmitted gender-sensitive?
- Who owns/controls the radio at home?
- Who usually owns and listens to the radio in the community?

- Women are largely excluded from radio broadcasts, both as hosts as well as target audience
- Women do not have leisure time during the day; rarely listen to programs of public interest, daily news, announcements of community meetings, etc.
- Men in positions of power are often favoured by radio hosts, even when it comes to issues affecting mainly women
- Men own the radios and choose radio programming at home

Community Meetings

- Who tends to organize community meetings?
- Who tends to promote community meetings and reach out to community members?
- At what time of day are they usually held?
- How are women and men notified about them (same or differently)?
- Where are they usually located? How long does it take for most people to reach the meeting venue?
- Who tends to provide information during community meetings?
- Who usually attends? Who usually speaks? Who is (most) listened to?

- Women do not feel implicated given that notices/invitation are often delivered by men working for the company and distributed to male leaders and male heads of households
- Women infrequently speak up at community meetings because they are often overlooked when a man has their hand raised
- Women's associations and youth organizations working on security-related issues were not provided with invitations
- Men tend to dominate the topics on the agenda during the meeting, as the agenda is generally set by community leaders (almost all men); concerns of women, girls, other groups are not prioritized
- The facilitator of the meeting is always a man from the local government
- When meetings are security-related, members of the local police are always present – which tends to limit the ability to raise concerns
- Men have more time to attend meetings at the end of the workday, as women have more domestic responsibilities (cooking, childcare, etc.)
- Community meetings are often held in one location that is close to the local government office; this location is convenient and accessible for men in the community because they are working close to here, or are able to easily take public transport to get there. Women have to walk a considerable distance in order to access public transport, and experience long wait times

⁷ This tool is an adapted version of a tool published in IMPACT's [Gender Impact Assessment Toolkit](#).



Stakeholder Engagement

Tool 1.3A (continued)

Communication Method: Complete the exercise for each method of communication that is used by the company to inform communities regarding stakeholder engagement events/security issues.

Women

Men

*Consider how information is both shared and received

Phone

- Who has access to a phone?
- Who tends to own and use the telephone?
- Do women and men have the capacity to read information sent through text message?

- Phone ownership in the area is about 85% for men, but only 35% for women; as such, more men access information shared by the company via text and voice messages meant to share information
- Women have fewer means to charge/buy airtime for their phones
- Women can receive calls on their husbands' phones; however, they have noted that this limits their privacy, autonomy to speak freely and ability to access any sensitive information
- Men can access their phones freely and without permission
- Men have higher education and literacy rates, which makes information shared by text and voice message easier for them to access; many women speak a local language that is not well supported on mobile platforms

Posters

- In what language are posters usually written?
- Where are posters usually placed?
- Who usually has access to these places?
- Who mainly reads posters and why?
- Are the posters representative of women and men?

- The messages conveyed in posters put up by the company were not expressed or validated by women in the community, and thus did not resonate with their realities or perspectives
- The posters were displayed in places that are predominantly frequented by men (e.g., government offices)
- The posters only depicted men, and did not represent women
- The posters used a lot of text in a language that is more accessible to men than women

Tool 1.3A (continued)

Communication Method: Complete the exercise for each method of communication that is used by the company to inform communities regarding stakeholder engagement events/security issues.

Women

Men

*Consider how information is both shared and received

Online

- Who has access to a computer and the internet?
- Who has access to cell phone and data?
- Who can afford data or internet costs?
- Who is computer literate?
- Who accesses information online?
- Who has an email account?
- Who has a social media account(s)?
- Do women and men use social media to access information?

- Men can more easily access information online, as they have higher cell phone/computer ownership and internet usership rates; men also often own stores or cafes that provide these services, and these are locations where men tend to congregate in the community
- Women have less access, and are less likely to be technologically literate; this creates a barrier for them to access information about the company online (either via the company website, news reports, etc.)
- Several women’s associations or networks have been created with the support of NGOs in the area; these associations have higher access to the internet, often through the offices of the NGOs. As such, this is also a location where women tend to congregate
- Men are more active on social media accounts than women, and therefore are able to more frequently receive information shared by the company on social media
- Men communicate actively via WhatsApp and other messenger applications, and this is used frequently to share information and create informal networks
- Men have more access to online news content, including information about security incidents or plans communicated by the government or journalists

Others

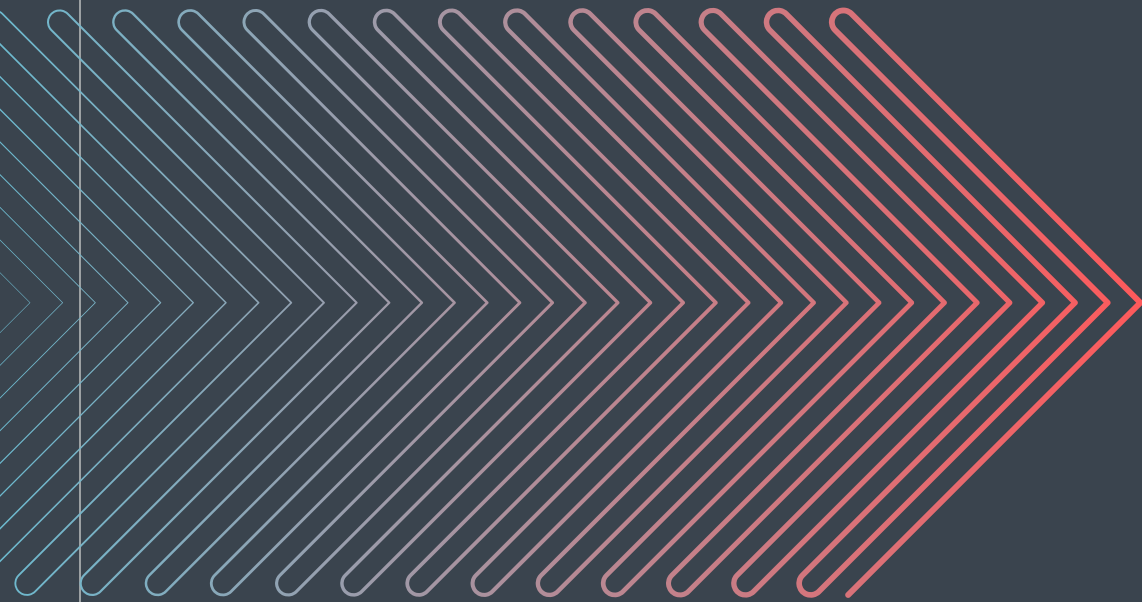
For example, megaphone, community theatre, word-of-mouth, newspaper

- Women tend to share and receive information through word-of-mouth, either from their husbands or the women with whom they work in the fields



Module Two

Risk Assessment



The IGT outlines a simple, step-based process through which companies can identify, assess and plan to mitigate risks to achieving the objective of the VPs – which is to ensure security is managed in a manner that respects human rights and international humanitarian law. In many contexts, women and other disadvantaged groups face disproportionately higher risk, or unique risks, compared to the general population. These require particular consideration throughout the risk assessment process.

While some companies may choose to conduct a stand-alone risk assessment for women and other disadvantaged groups, others may wish to avoid duplication by using integrated approaches that embed the specific circumstances and realities of women and other disadvantaged groups within their risk assessment process. This module focuses on providing guidance and tools to help companies embed these considerations into their existing process for conducting a risk assessment, based on the steps established in the IGT, as well as to reflect on potential preventative and mitigation measures.

Objectives of Module 2

The Risk Assessment Module helps companies:

- Identify ways of better integrating unique and disproportionate risks to women and other disadvantaged groups into the company's risk assessment process; and
- Reflect on ways in which these risks can be prevented or mitigated.

This Module is composed of the following steps:

- Step 2.1: Establish scope and scale
- Step 2.2: Identify sources of risk for women and disadvantaged groups
- Step 2.3: Identify risks for women and disadvantaged groups
- Step 2.4: Assess risks for women and disadvantaged groups
- Step 2.5: Identify risk treatment/mitigation for risks affecting women and disadvantaged groups
- Step 2.6: Communicate, monitor and update risk assessment
- Step 2.7: Address risk assessment challenges

Considerations Before You Get Started

The IGT outlines a number of important points at which a risk assessment should be conducted, such as at the onset of a new project, a major change to an existing project (e.g., expansion, acquisition, etc.), or a major external event, including a major political or policy decision. Companies should ensure that they take a broad view of major external events, as a narrow view may obscure important events that affect only (or disproportionately) women and/or other disadvantaged groups. For example, a policy change that targets a particular group – such as anti-LGBTQI+ legislation, for example – can bring very significant risk to individuals who identify as LGBTQI+, though this type of legislation is not always recognized as a major event in the wider context of extractive projects and security. While policy or legal changes targeting specific groups may not require a company to carry out a full risk assessment, companies should develop internal systems and approaches to analyzing particular events or changes that may require a reassessment of the risks to certain groups with which their operations and security management could have an impact.



Risk Assessment

In order to meaningfully embed and address the unique and disproportionate security and human rights risks facing women and other disadvantaged groups, companies need to ensure adequate resourcing. Below are some considerations with respect to the resources needed:

- Companies should strive for diversity and gender-balance in a risk assessment team – not simply in numbers, but also in terms of responsibilities and leadership. Consider this both for company staff as well as local consultants or partners that may be involved in carrying out a risk assessment.
- Companies should ensure that staff members responsible for risk assessments have clear requirements to incorporate the engagement of women and other disadvantaged groups into risk assessments, such as through their job descriptions or Terms of Reference, and are provided with adequate support, resources and training in GBA+ methodologies. Where resources are constrained, companies can draw on publicly available resources, such as the Government of Canada's [GBA+ Course](#), or consider co-funding such trainings via association or initiative memberships.
- Risk assessment processes should have adequate resources to engage with women and other disadvantaged groups, such as for hosting discussion sessions with women and other disadvantaged groups, interpreters where women and other disadvantaged groups may speak specific languages, childcare support, and transportation reimbursements. Women and other disadvantaged groups should be supported to identify and articulate their barriers to being engaged during risk assessment processes, and to be met with an openness to addressing them.

TIP

What information sources should be consulted during a risk assessment?

The IGT offers a range of sources from which companies can obtain information to inform a risk assessment. Within this list, companies should consider the extent to which these sources adequately reflect risks to women and other disadvantaged groups. For example, when relying on data sets or surveys, is the data provided gender-disaggregated? Was data collection carried out in areas that are predominantly of a particular ethnic, religious or cultural background? Do local organizations or community members informing the risk assessment adequately and rightfully represent the views of women, men, girls and boys? Is there a potential that particular groups have been omitted or are not reflected in the available information sources?

Where an analysis of these sources identifies potential gaps, companies should attempt to fill them, such as by reaching out to additional organizations and community groups with the right expertise.

Step 2.1 Establish the Scope and Scale of Assessment

The IGT offers a comprehensive set of questions to guide companies in determining the scope and scale of risk assessment that is required in a particular location, recognizing that the presence, severity and probability of risks differ significantly from one location to another. In establishing the scope and scale of assessments, companies should consider the potential risks that are unique to women and other disadvantaged groups, as well as risks that, if realized, would have a disproportionate impact on women and other disadvantaged groups.

The following tool recreates the Self-Assessment Table in the IGT with an additional set of questions (outlined in orange) that can help users to better incorporate women and other disadvantaged groups into the determination of the scope and scale of a risk assessment.

Tool 2.1A

Self-Assessment Tool for Establishing Scope and Scale of the Risk Assessment⁸

Ask yourself...	Is this a potential source of risk for your company?
Conflict Situation	
Is there a recent history of, or potential for, violent conflict in the country?	
Has current or previous conflict been linked to tensions between particular ethnic, religious or cultural groups? Have there been human rights violations and security incidents (both reported and unreported) – including a high prevalence of domestic violence and/or sexual and gender-based violence (SGBV) – targeted at particular groups?	
Is there potential for a recurrence of such violence?	
Is the potential for international conflict a concern?	
Is drug trafficking, human trafficking, smuggling or other illicit activity a problem in the country?	
Are there high levels of criminal activity?	
Is there any insurgency, armed separatist, guerrilla or paramilitary groups operating in the country?	
Are there unsettled territorial or political claims in the country from previous conflicts?	
Will the company be relying on public security providers?	
Have there been disarmament, demobilization and reintegration (DDR) efforts that have seen members of non-state armed groups integrated into public or private security forces? Have there been sexual and gender-based violence-prevention/anti-harassment and anti-discrimination measures put in place in relation to DDR efforts?	
Is there a high proliferation of firearms and other weapons?	
Is there potential for violence against disadvantaged groups (e.g., women, minorities, Indigenous peoples)?	
Are there harmful societal norms that discriminate against women and/or other disadvantaged groups that may fuel or exacerbate conflict at local, regional or national levels?	
Are there tensions between local communities and migrant populations?	
Is there tension between large-scale mining, oil or gas operators (or other) with particular sectors that could be deemed as vulnerable (e.g., artisanal mining, fisherfolk, etc.)?	

⁸ The questions in black are original questions from the IGT, everything in orange has been added.



Risk Assessment

Tool 2.1A (continued)

Ask yourself...	Is this a potential source of risk for your company?
Security Provisioning	
Has the competence of public security providers ever been called into question?	
Has the competence of private security providers ever been called into question?	
Are public security providers poorly resourced (i.e., shortage of equipment, fuel, vehicles, etc.)?	
Do security providers (public or private) include women/members of ethnic minorities/religious minorities/etc.?	
Do public security providers have a reputation or history for human rights abuses (e.g., arbitrary arrests, torture, etc.) and violations of humanitarian law?	
Do private security providers have a reputation or history of human rights violations?	
Are private security providers legally permitted and available in country?	
Is there an inadequate level of understanding of human rights and humanitarian law by security providers?	
Are public security providers not paid adequately and/or regularly?	
Have security providers (public or private) been accused of rights violations against women or other disadvantaged groups (e.g., Indigenous people, ethnic/religious minorities, etc.), including but not limited to sexual and gender-based violence?	
Have security providers (public or private) been sensitized on the rights of women and other disadvantaged groups?	
Have security providers (public or private) been provided with gender and diversity training?	
Do security providers (public or private) offer recourse or remedy in response to claims of discrimination or harassment from women or other disadvantaged groups? Are they accessible? ⁹	

⁹ Note: All ICoCA Members and Affiliates must have a grievance process in place and be publicly accessible, therefore, checking whether a (prospective) security provider is a Member or Affiliate of the ICoCA might also be a good mitigation measure. The ICoCA also offers free training to Member and Affiliate companies on aspects such as prevention of sexual exploitation and abuse and human rights.

Tool 2.1A (continued)

Ask yourself...	Is this a potential source of risk for your company?
Governance	
Is corruption a perceived problem in the country?	
Is there a history of, or potential for, political instability?	
Is there a history of/potential for the government to push for preferential hiring of individuals from a particular ethnic, religious or cultural group?	
Are the rights of minority groups viewed as repressed or abused (e.g., ethnic minorities, religious minorities, cultural minorities [e.g., Indigenous status], sexual orientation, etc.), and if so, by whom?	
<p>Could the credibility of investigations into human rights abuse allegations in the country be questioned?</p> <ul style="list-style-type: none"> • Is there a lack of capacity by the host government to carry out effective investigations (including those related specifically to sexual violence)? • Is there the potential for political interference in such investigations? • Is there potential for investigations to be biased where a victim is of a particular gender, race, ethnicity, religion, class, etc.? 	
Are there limitations on press/media or civil society freedoms?	
<ul style="list-style-type: none"> • Are democratic or political freedoms repressed? • Are land rights, labour rights, environmental rights and/or human rights activists specifically targeted or persecuted? 	
Is the capacity of the government to govern effectively questioned?	
Do victims of human rights abuses (including women and other disadvantaged groups) have access to an effective judicial system?	
Are there adequate and specific laws to protect women and other disadvantaged groups from violence and abuse (e.g., laws against rape, sex trafficking, child abuse, etc.)? Are they applied?	
Are decision-making structures inclusive (applicable at local, state/provincial/territorial and national levels)? Are women and other disadvantaged groups supported to actively participate?	



Risk Assessment

Tool 2.1A (continued)

Ask yourself...	Is this a potential source of risk for your company?
Socio-Economic	
<ul style="list-style-type: none">• Is poverty prevalent?• Are there particular groups that are more affected by poverty than others (e.g., women, people of a particular ethnic or religious group, Indigenous people, etc.)?• Is disaggregated data available and does it support the latter statement that a particular group is disproportionately affected?	
Is there a presence of conflict, armed or otherwise, over the use of land or natural resources (e.g., land access, water quantity or quality, etc.)?	
<ul style="list-style-type: none">• Is there a high disparity in income or wealth distribution?• Is this disparity between particular or distinct groups?	
Are there ethnic or religious tensions?	
Are labour issues a concern in the country (e.g., industrial action, trade union activism, labour conflict, etc.)?	
Is the repression of civil and political rights (e.g., freedom of movement, freedom of opinion or expression, freedom of sexual/gender orientation) a concern?	
Are the rights of Indigenous Peoples (IPs) perceived to be abused?	
Are there unconventional or non-transparent business rivalries in the country?	
Is there a history of community opposition to development or investment projects?	
Is there a lack of an active and coordinated civil society?	
Will the project involve a community resettlement?	
Are there high rates of gender inequality (political, economic, social)?	
Are there high rates of violence/abuse (either officially reported or established via other means, such as community reporting, media, etc.)?	
Is there meaningful access to services in incidents of abuse?	

Tool 2.1A (continued)

Ask yourself...	Is this a potential source of risk for your company?
Physical Environment	
Are there real or perceived negative environmental impacts (e.g., soil, air, water, etc.)?	
<i>Are these impacts likely to disproportionately impact women or other disadvantaged groups?</i>	
Has past environmental performance of industry or other actors in the country or region been poor?	
Is the area susceptible to natural disasters (e.g., typhoons, flooding, landslides, earthquakes, volcanoes, etc.)?	
<i>Are there groups that would be/are disproportionately impacted by natural disasters (e.g., women, children, etc.)?</i>	
Are there key environmental challenges or concerns in the prospective area of company operations (e.g., high levels of biodiversity, species at risk)?	
<i>Will/have the company's operations changed the physical environment in a manner that will have particular impacts on women and/or other disadvantaged groups (e.g., erecting a perimeter that blocks a key transportation route to a water source or trading venue)?</i>	



Risk Assessment

Step 2.2 Identify Sources of Security and Human Rights Risks

The next step outlined in the IGT asks users to consider potential security and human rights risks that could be created from the sources of potential risk identified in Step 2.1. The table below provides additional illustrative examples that assessors should consider when identifying sources of risks that are either unique to or amplified for women and other disadvantaged groups.

Tool 2.2A

Sources of Risk to Women or Other Disadvantaged Groups

Note that Column 2 is not an exhaustive list but is designed to prompt thinking into the risks that may be relevant. Remember that you can add other security and human rights risks to those suggested.

Sources of potential risk	Potential security and human rights risks	Yes	No
Conflict Situation <ul style="list-style-type: none"> Recent history of conflict Potential for recurrence of conflict Potential for international conflict Illicit activity (e.g., drug trafficking, smuggling, etc.) Insurgency, armed separatist or guerilla group Unsettled territorial claims 	<ul style="list-style-type: none"> Sexual and gender-based violence used specifically as a tactic of war/conflict Genocide or violence against targeted disadvantaged groups (ethnic minorities, religious minorities, etc.) Destruction of community infrastructure that disproportionately impacts women or other disadvantaged groups (e.g., schools, places of worship, etc.) Exclusion of women and other disadvantaged groups from peacebuilding/ disarmament, demobilization and reintegration processes Reduction of civic spaces, in particular for ethnic or religious minorities, following the proclamation of a state of emergency or state of siege Human trafficking (especially of women and girls) Tensions over influx of refugee populations 		
Security Provisioning <ul style="list-style-type: none"> Low level of competence of public security providers Low level of competence of private security providers Low level of resources Poor human rights record by public security providers Low understanding of human rights and humanitarian law by security providers 	<ul style="list-style-type: none"> Sexual and gender-based violence – committed against members of the community Sexual and gender-based violence – committed against security providers by other security providers Inability of public or private security providers to adequately handle incidents of sexual and gender-based violence (e.g., lack of trained employees, lack of women guards, lack of proper facilities, etc.) Lack of effective grievance mechanisms (judicial and non-judicial) Use of firearms or other weapons in domestic violence incidents (either by public or private security providers) Culture of fear/intimidation due to the presence of security providers Security-induced restrictions close off civic spaces used by women and other disadvantaged groups to defend their rights 		

Tool 2.2A (continued)

Sources of potential risk	Potential security and human rights risks	Yes	No
<p>Governance</p> <ul style="list-style-type: none"> • Corruption • Political instability • Weak rule of law • Poor governmental capacity • Limitations or repression on press freedoms, media, civil society freedoms • Disagreement between central and local governments related to resource extraction 	<ul style="list-style-type: none"> • Politically motivated violent attacks against disadvantaged groups in the extractives space (e.g., human rights defenders, labour union leaders, etc.); <ul style="list-style-type: none"> ◦ Heightened risk when they are women ◦ Heightened risk when they are Indigenous (women) • Growing restrictive legislation enables attacks and smear campaigns on civil society, putting women and disadvantaged groups in danger • Exploration of resources by international companies and their contribution to central government budgets are not accepted by local communities and lead to conflict which negatively affects women and other disadvantaged groups 		
<p>Socio-Economic</p> <ul style="list-style-type: none"> • Poverty; income or wealth disparity • Land or resource conflict • Ethnic or religious tensions • Tensions over resettlement • Concerns over negative social impacts of company activities (e.g., local inflation, negative impacts on social cohesion, etc.) 	<ul style="list-style-type: none"> • Increases in instances of domestic abuse/violence against women • Instances of sexual and gender-based violence perpetrated by security providers (public or private) • Tensions created due to increased income inequality between men and women, or between particular groups (e.g., Indigenous and non-Indigenous) if hiring practices privilege men or specific groups (whether intentionally or unintentionally), and company wages are significantly higher than other employment or income-generating activities • Elevated risk of domestic violence for women hired by the company and receiving higher income • Increased risk of prostitution/trafficking for women and girls with influx of migrant workers, including public or private security providers 		
<p>Physical Environment</p> <ul style="list-style-type: none"> • Negative environmental impact (e.g., air, water, soil, etc.) created by company activities • Past poor environmental performance by industry • Key environmental challenges (e.g., biodiversity, species at risk) 	<ul style="list-style-type: none"> • Changes to physical environment that may have unintended negative impacts (e.g., blocking key transportation routes, placing security forces with poor human resource records in closer proximity to at-risk groups, etc.) • Introduction of access roads that leads to an influx of people from elsewhere into or near vulnerable communities • Introduction of worker camps that leads to an influx of foreign or non-native workers (predominantly men) near potentially vulnerable populations. 		

Applying an Intersectional Lens to Risk

In its report, [Women Environmental Human Rights Defenders: Facing gender-based violence in defense of land, natural resources and human rights](#), the International Union for the Conservation of Nature (IUCN) outlines the extent to which women environmental human rights defenders face a disproportionate threat of gender-based violence. This risk is often exacerbated for Indigenous women. Applying an intersectional lens to security and human rights risks can not only identify particular groups that face a disproportionate risk or a unique risk but can also support more tailored and effective risk mitigation strategies that respond to the realities and needs of women and other disadvantaged groups.



Risk Assessment

CASE STUDY 3

Identifying and Finding Solutions for Security and Human Rights Risks for Women from the Tasi Mane Petroleum Infrastructure Project

The following case study emphasizes the importance of ensuring women's right to be free from discrimination in community consultations – whether conducted by civil society, private companies or the government – is respected.

A project was undertaken by a local civil society organization, Fundasaun Mahein (FM) to foster multi-stakeholder dialogues on security and human rights risks of the Tasi Mane project, particularly for women. The intended outcome of the project was to raise awareness among public officials and security providers and to promote recommendations for solutions for mitigating these risks. The project's activities included:

- Research and dissemination of findings of the gendered security and human rights risks of the Tasi Mane project through media reports, radio programs, press conferences;
- Four security sector discussions with two communities, allowing women to discuss the human rights impacts of the Tasi Mane project;
- Press conference to launch security sector reform recommendations to address gendered security and human rights risks; and
- Outreach to the Human Rights Ombudsman.

This project resulted in positive outcomes while also highlighting limitations of previous engagement initiatives. The women who participated in the security sector discussions convened by FM were happy to participate in meetings and finally have a chance to air their views and discuss the impact of the large-scale petroleum project. However, these engagements revealed just how much women had been excluded from previous state-sponsored human rights impact assessments of the project: when these state-run community meetings took place, women could come, but were immediately sent to the kitchen to prepare meals for the other participants, rather than being welcomed as active participants.

Step 2.3 Identifying and Characterizing Risks

In Step 2.3, identified risks are turned into risk statements in order to identify the type, source and potential consequences of the risk if it were to be realized, as well as the particular actors involved, and stakeholders affected. Below, we have re-created Tool 2.3 from the IGT using examples of risks that often uniquely or disproportionately impact women and other disadvantaged groups. An additional column has been added where there is a heightened risk for a particular disadvantaged group.

Note that these examples are illustrative and not meant to encapsulate all potential risks to women and other disadvantaged groups. In addition, where the table points to a risk to a specific group – such as women and girls – this does not necessarily indicate that there is no risk to individuals from other disadvantaged groups, but that in this particular example, there is a heightened risk.

Identify Risks for Women and Disadvantaged Groups

Type of Security or Human Rights Risks	Risk I.D No./ Letter	Risk Statement or Scenario	Stakeholders Affected	Heightened Risk for Disadvantaged Groups	Actors Involved	Potential Consequences
Security providers sexually harass women and girls who come into proximity with the mine site perimeter	A	Security providers securing the perimeter of an operation sexually harass individuals traveling along the perimeter of a mine site, leading to emotional/social harm to those individuals.	Women and girls in the community	Women who are artisanal miners (especially if informally/ illegally) Indigenous women and girls Women and girls who are an ethnic minority Sex workers	Public and/ or private security providers	<ul style="list-style-type: none"> • Women feel insecure • Women experience social harm due to cultural norms and taboos that place women at fault for unwanted sexual advances/harassment • Women avoid areas where security providers are present, which impacts their ability to access land, food, and other needed goods/services. • Loss of livelihood due to perceived insecurity • Heightened risk of the occurrence of violence if women and girls ignore or refuse advancements
Increased militarization creates a culture of fear	B	The presence of security guards (public or private) contributes to increase social tension and anxiety, which manifests itself in increases in incidences of gender-based violence and other psychosocial impacts for women (e.g., increased stress, anxiety, etc.).	Local community members	Women Children (girls and boys) Elders	Public and/or private security providers	<ul style="list-style-type: none"> • Increase in incidents of gender-based violence/rights violations of women, including gun-related and armed violence • Increased mental stress and anxiety for women with respect to ensuring their own and their dependents safety (e.g., children, siblings, parents, etc.) • Derivative impacts of increased stress and anxiety on women to their dependents (e.g., children, elderly parents, etc.) • Re-victimization of women, men, girls and boys, in instances where previous armed conflict has occurred



Risk Assessment

Tool 2.3 (continued)

Type of Security or Human Rights Risks	Risk I.D No./ Letter	Risk Statement or Scenario	Stakeholders Affected	Heightened Risk for Disadvantaged Groups	Actors Involved	Potential Consequences
Presence of security guards have negative impacts on artisanal and small-scale miners	C	The presence of public and/or private security providers at a mine site results in local artisanal miners engaging in riskier behavior in order to avoid detection, such as entering premises at night or scaling fences.	Artisanal and small-scale miners	Women and girls working (directly and indirectly) in artisanal and small-scale mining	Public and/or private security providers	<ul style="list-style-type: none">• Increased injuries for artisanal and small-scale miners• Heightened risk to women in particular if they are working at night (especially given that areas with an absence of good lighting tend to be more insecure for women)
Increased resentment or social tension stemming from hiring practices for security personnel	D	The hiring of security forces from a particular ethnic group leads to increased social tension between local groups.	Local community members	Ethnic minorities	Company human resource/ management personnel, public and/or private security providers	<ul style="list-style-type: none">• Increased social tension• Increased conflict or violence, resulting from increased social tension• Increased risk of incidents against ethnic minorities (where security providers are only hired from a majority group)

Tool 2.3 (continued)

Type of Security or Human Rights Risks	Risk I.D No./ Letter	Risk Statement or Scenario	Stakeholders Affected	Heightened Risk for Disadvantaged Groups	Actors Involved	Potential Consequences
Risks related to public and/or private security providers with access to small arms and light weapons (SALW)	E	Public and/or private security providers with access to SALW, which leads to an increase in weapons-related incidents of domestic violence.	Women, other dependents (e.g., children)		Public and/or private security providers	<ul style="list-style-type: none"> • Increased harm, primarily to women, in domestic violence incidents • Increase in deaths related to domestic-violence incidents using SALW
The presence of public and/or private security providers increases the circulation of SALW in the local community	F	Public and private security providers are involved in black market trading in SALW, increasing the supply of SALWs in the local community.	Local community members	Women and other dependents (e.g., children) Ethnic minorities	Public security providers	<ul style="list-style-type: none"> • Increase in gun-related crime. • Increased incidents involving SALW



Risk Assessment

Step 2.4 Assess Risks

The IGT provides a risk matrix tool for companies to assess their risks based on a sliding scale of both consequences if a risk becomes reality, and the probability of that risk occurring in the first place. This allows companies to conceptualize the different risks facing the company and community, which may not view risk in the same way (including within the community itself). Below, an adapted version of the consequence risk criteria is provided in order to integrate an approach that better considers women and other disadvantaged groups.

Table 3:

Consequence Risk Criteria¹⁰

Consequence Rating	Definition
Catastrophic	<ul style="list-style-type: none"> Loss of lives of company personnel or within communities (immediate or long-term – e.g., transmission of fatal sexually-transmitted disease via instances of rape); OR Significant damage to company property, reputation, or other assets; OR Significant damage to community property or assets that hold considerable ethnic, cultural or historical significance (e.g., Indigenous burial ground, religious structure, etc.); OR Major human rights violation(s) committed by security forces (e.g., extrajudicial killings, torture, rape, forced pregnancy, worst forms of child labour, etc.); OR Violations of international humanitarian law (e.g., indiscriminate attacks on civilian population, abductions, collective punishments, displacements, rape, forced marriage).
High	<ul style="list-style-type: none"> Injuries to company personnel or communities; OR High damage to company property, reputation or other assets; OR High damage to community property or assets that hold considerable ethnic, cultural or historical significance (e.g., Indigenous burial ground, religious structure, etc.); OR Non-fatal but serious human rights violation(s) committed by security forces (e.g., unlawful detention, sexual harassment); OR Serious negative impacts on community, particularly for disadvantaged populations (e.g., increase in gun-related violence against women or removal of a critical water source).
Medium	<ul style="list-style-type: none"> Moderate injuries to company personnel or communities; OR Moderate damage to company property, reputation or other assets; OR Moderate damage to community property or assets that hold considerable ethnic, cultural or historical significance (e.g., indigenous burial ground, religious structure, etc.); OR Human rights abuses occur leading to minor, non-permanent injuries; OR Moderate negative impacts on community well-being, particularly for disadvantaged populations (e.g., increased stress and anxiety).
Low	<ul style="list-style-type: none"> Minor damage to company property, reputation or other assets; OR Minor damage to community property or assets that hold considerable ethnic, cultural or historical significance (e.g., Indigenous burial ground, religious structure, etc.); OR Minor negative impacts on community well-being, particularly for disadvantaged populations; OR Potential perception of minor human rights abuses.

¹⁰ The text in black are original definitions from the IGT (Module 2 – Table 1), everything in orange has been added.

TIP

Broadening Risk Analysis

Companies should strive to identify longer-term impacts that the presence of security providers may have on local communities and existing inequalities, with careful consideration of how these may be unique or more severe for women and other disadvantaged groups. It is important to consider that women and other disadvantaged groups often experience increased risk of poverty, social exclusion, discrimination, violence, food insecurity, poor health, and more. As such, the presence of security forces within the vicinity of where they live, work or meet some of their basic needs (e.g., food sources, markets, healthcare, etc.) can significantly alter their daily lives both in the immediate and long-term. The presence of security forces can also serve to reinforce existing inequalities. Below we provide some examples of questions that companies may want to consider when looking at risks which could lead to long-term negative impacts.

- Are women or other disadvantaged groups likely to change their transportation routes to avoid security providers? Does this affect how women and other disadvantaged groups can access their homes, source of livelihood or other basic needs on a regular basis (daily/weekly/monthly/annually)? What are the implications for changing these transportation routes?
 - E.g., Could longer transportation routes lead to a loss of or less income? Long-term negative physical impacts? Could changes in transportation lead to increased tension with a partner (e.g., in the case where women have less time to tend to other household responsibilities)? Could alternate transportation routes create situations where women are more isolated or cut off from cell signals for example? Do alternate transportation routes see women or other disadvantaged groups traveling in areas that are less safe (e.g., poorly lit areas, high-crime areas, etc.)?
- Could the influx of public or private security providers from outside the project area potentially lead to an increase in unwanted pregnancies or abandoned mothers/children within nearby communities?
- Are security providers likely to have frequent contact with women and other disadvantaged groups that may fuel any negative stereotypes or taboos (e.g., flirtation and harassment carried out by male security guards with local women leads to rumors and stigmatization related to promiscuity)?
- Are the security arrangements at a particular site (e.g., erecting a fence or physical barrier, or posting a unit of guards in a particular location) impacting or impeding access to an area (water source, agricultural land, etc.) that is primarily depended on by women and other disadvantaged groups?
- Are women or other disadvantaged groups who are detained by security providers likely to experience significant harm or negative impacts by providers themselves and/or if they are transferred into the custody of local police forces?
- Are security providers going to be traveling in other areas outside of the project location (e.g., escorting personnel to and from a project site)? What are the potential risks for women and other disadvantaged groups in these other locations (e.g., along the transportation route)?
- Is the project introducing new technologies that could evoke concerns from women and other disadvantaged groups (e.g., could the use of drones at a project site instill fears regarding privacy and surveillance amongst particularly vulnerable actors, such as human rights defenders?)

Incorporate Women and Disadvantaged Groups into Conflict Analysis and Research

In conflict-affected areas, a thorough conflict analysis is necessary to understand the root causes of conflict and the roles that prospective security providers, private or public, have either played or continue to play in this conflict. These analyses should specifically identify the differentiated impacts and experiences of women, men, girls and boys, via an intersectional lens that identifies and understands additional points of vulnerability or disadvantage. The UN has recognized the use of sexual and gender-based violence as a specific tactic of war and conflict. As such, for many women and girls, the presence of private and/or public security providers in certain locations is likely to elicit negative reactions and instill fear – particularly in areas where individuals known for committing acts of violence continue to hold their positions, or where there is a lack of accountability and high levels of impunity.

Furthermore, in many post-conflict areas, disarmament, demobilization and reintegration (DDR) processes have resulted in ex-combatants being integrated into public or private security forces. Companies should use specific gender and conflict analysis tools – such as the [Gender and Conflict Analysis Toolkit for Peacebuilders](#) – or adapt their existing methodologies to ensure that a GBA+ lens is applied. The [Security and Human Rights Toolkit](#) and the [Conflict Prevention Tool](#) also offer helpful guidance.



Risk Assessment

Step 2.5 Identify Risk Treatment/Mitigation

Considering Gender and Disadvantaged Groups

As is the case when identifying risks, companies should also ensure that strategies to handle and mitigate risks do not overlook the unique needs and circumstances of women and other disadvantaged groups. This includes identifying whether they face a disproportionate or unique risk, or whether they may suffer more negative impacts should these risks occur. The table below reproduces the IGT's tool for identifying risk treatment and mitigation measures, with some additions (in orange) that highlight how companies can deepen this exercise to better account for risks to women and other disadvantaged groups. An additional example is also provided to illustrate a different risk level.

Tool 2.5

Identifying Risk Treatment/Mitigation¹¹

Risk Level	Risk Scenario/Statement	Additional Considerations for Disadvantaged Groups	Possible Risk Treatment Measure(s)	Notes and Considerations
Major	Public security providers harass and intimidate opposition groups protesting against the project	Heightened risk for women protestors, Indigenous protestors (and especially Indigenous women protestors), potential escalation to (or threat of use of) sexual violence	Establish human rights (including Indigenous rights, where applicable), gender sensitivity/Prevention of Sexual Exploitation and Abuse (PSEA) and humanitarian law training program with public security providers and incorporate into memorandum of understanding.	Only partial control over this action - will have to coordinate with other stakeholders, particularly women and Indigenous leaders and representatives. Could be highly effective and feasible with the right training program.
Medium	The presence of private security guards from outside the community creates anxiety amongst members of the community.	Heightened risk for women and girls in the community, who may feel a disproportionate amount of anxiety related to the presence of predominantly male security providers (e.g., threats of sexual harassment, intimidation, rumors, etc.). Consider groups of women or girls who may be particularly at risk (e.g., lower socio-economic status, indigenous, etc.)	Identify opportunities to introduce security providers within the community, build trust, and ensure there is knowledge of platforms for voicing concerns and launching complaints; ensure private security providers have undergone training on PSEA/ anti-harassment and carry out an additional overview of the Code of Conduct provisions on harassment/ sexual harassment.	In the long-term, identify ways in which there can be a transfer of skills to private security providers in the community.

¹¹ The text in black are from the IGT (Module 2), everything in orange has been added.

Step 2.6 Communicate, Monitor and Update Risk Assessment

The IGT notes that a risk assessment is an evolving process, as the context within which companies are operating can and will change over time – sometimes rapidly, and sometimes over longer periods of time. As noted in the introduction to this module, companies should pay careful attention to changes that may significantly alter the context specifically for women and other disadvantaged groups in particular, as well as contextual changes that may have more significant impacts on women and other disadvantaged groups. This should be a specific responsibility that is clearly outlined amongst company employees involved in and responsible for risk assessment, to ensure that it is not inadvertently overlooked. Table 4 outlines some examples of potential triggers for updating a risk assessment that are outlined in the IGT, and the potential implications for women and disadvantaged groups.

Table 4:

Potential Triggers for New or Revised Risk Assessments

Trigger	Considerations for women and other disadvantaged groups
A change of government, constitution or otherwise	<ul style="list-style-type: none"> • A regime with a poor record regarding women's rights is elected or takes control of the government (e.g., coup, civil war, etc.). • A regime associated with a particular ethnic group or religious group is elected or takes control of the government (e.g., coup, civil war, etc.), and raises concerns regarding the treatment of other ethnic/religious groups.
Widespread social unrest	<ul style="list-style-type: none"> • Social unrest that may involve risks of detention of particular individuals during social unrest or protest based on their race, ethnic background, religion, culture or other identity. • Social unrest that specifically targets individuals for harm or property damage based on their identity, such as race, ethnic background, religion, culture or other identity.
Outbreak of violent conflict in the country or region	<ul style="list-style-type: none"> • Violent conflict targeting a particular ethnic, cultural or religious group. • Conflict involving groups previously known to have engaged in sexual violence (particularly against women and girls).
An economic crisis	<p>Economic crises may lead to some of the following:</p> <ul style="list-style-type: none"> • Increases in child labour. • Increases in prostitution and sex work, primarily for women. • Increase in artisanal and small-scale mining in the vicinity of the project. • Increase in migration from neighboring communities or countries (including those working in artisanal and small-scale mining). • Increase in certain types of criminal activity that may disproportionately impact women and other disadvantaged groups (e.g., human trafficking).
Major discovery of natural resources	<ul style="list-style-type: none"> • Increase in artisanal and small-scale mining in the vicinity of the project. • Increase in migration from neighboring communities or countries (including those working in artisanal and small-scale mining).



Risk Assessment

Trigger

Considerations for women and other disadvantaged groups

Changes in allocation of natural resource wealth

- New methods for allocating natural resource wealth favour/exclude a particular group.
- The governance of new allocation methods at the community level (e.g., royalties paid to local community trusts) favour/exclude particular groups.

A natural disaster/ climate-induced change (e.g., crop failures due to excessive rain or persistent drought) which affects overall economic security but has particular/ exacerbated impacts for women and other disadvantaged groups.

- Women and other disadvantaged groups often have less access to resources to evacuate or seek safety from a natural disaster (e.g., do not own a vehicle, cannot access transportation, responsible for more dependents – such as children, elderly parents, and others).
- Some disadvantaged populations – such as elderly people, people with a disability, or Indigenous peoples living in remote areas – may have less access to technology services that help to warn them or inform them of pending natural disasters or response efforts.
- Lack of inclusion in disaster planning results in disadvantaged groups being left out of disaster responses.
- Relocation efforts following natural disasters discriminate against or do not adequately reflect the needs of particular disadvantaged groups (e.g., relocating Indigenous peoples to areas where they lack a sustainable clean water source).

Risk Assessments Following COVID-19

The onset of the COVID-19 pandemic is a prime example of an event requiring companies to revise their risk assessment, given the widespread economic, social and security implications that the pandemic had on people across the world – implications that were often most acutely felt by women and other disadvantaged groups. Restrictions on movement created an opportunity for potential abuse of power by security providers in many countries, and were especially felt by certain disadvantaged groups – such as homeless people, sex workers or migrants. Restrictions on movement also had significant implications for how companies managed and monitored security situations or conducted risk assessments and community engagement, as the reliance on virtual platforms increased significantly. Access to virtual platforms requires technologies and connectivity that are often less accessible to women or other disadvantaged groups, creating an additional barrier to not only their participation in risk assessment or community engagement processes, but also in accessing grievance mechanisms should an incident occur. Additionally, collapsed economies or destruction of particular sectors has removed sources of livelihood for many people, putting them into economic insecurity and driving migration into other sectors, such as artisanal mining. The closure of schools also resulted in an increase in child labour or the presence of children in particular and potentially high-risk sectors, such as artisanal and small-scale mining.

Step 2.7 Address Risk Assessment Challenges

Companies are likely to experience a number of challenges when attempting to identify and respond to risks to women and disadvantaged groups. While some risks to women and disadvantaged groups can be more easily prevented and mitigated, others may be difficult – especially where the company lacks control or influence amongst other actors. The following tool builds upon the IGT version for identifying risk assessment challenges, by helping companies to reflect on their degree of influence and power over particular risks, along with identifying and prioritizing ways of addressing these risks.

Tool 2.7

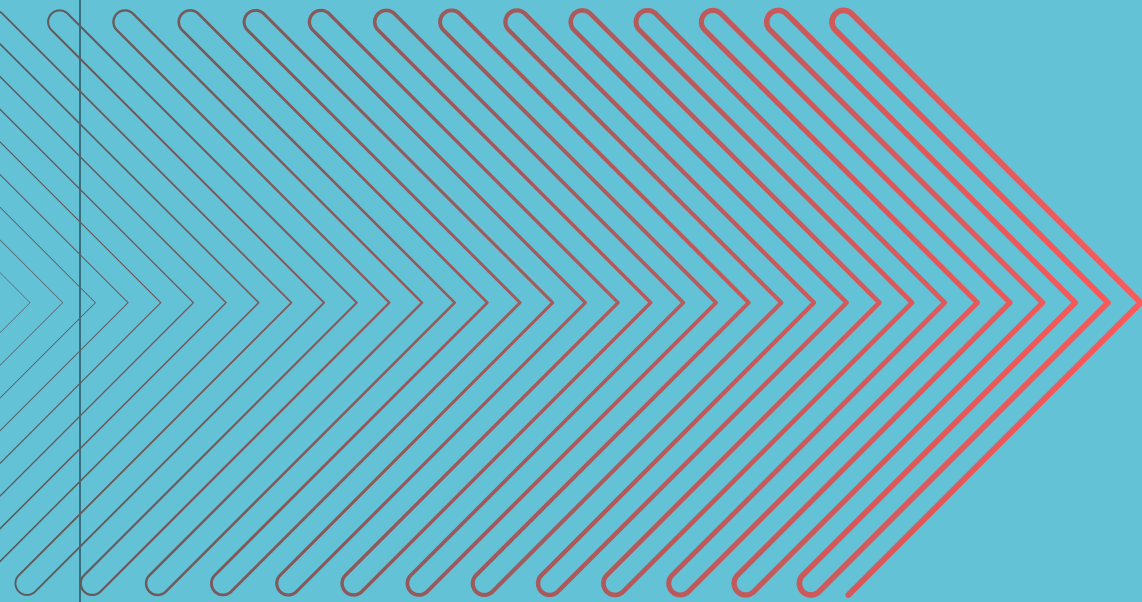
Risk Assessment Challenges

Type of Challenge	Description of Control/Influence	Action Item
When collecting information via desk-based means, it can be difficult to obtain news articles, reports or other sources of information that reflect the specific circumstances or experiences of women or other disadvantaged groups, as these are often gender-neutral or gender-blind, and written from dominant perspectives.	Some influence – while the company cannot control what and how information is produced by others, it can control how its own information is gathered as well as invest in alternative methods for collecting more representative and inclusive information.	As information is pivotal to informing a complete risk assessment, identify gaps and how these can be filled, such as: <ul style="list-style-type: none"> • Conducting a gender-disaggregated community survey • Identifying community-based organizations or academic organizations to support • Hosting dialogue sessions Encourage various levels of government to collect gender-disaggregated data.
Lack of specific gender or inclusion expertise on the risk assessment team	Some influence – while resources are not infinite, companies do control how they budget for the implementation of the VPSHR, including those needed to carry out an effective risk assessment process, and can increasingly prioritize resources that support the application of a gender and inclusion lens to their implementation.	To address this issue, companies can: <ul style="list-style-type: none"> • Add a specific budget line to ensure that external expertise is available to the risk assessment team • Provide training resources to the risk assessment team in order to increase their own skills and ability to incorporate gender and disadvantaged groups into their risk assessment. • Incorporate experience related to gender, gender equality, inclusion, etc. into job advertisements or terms of reference for risk assessment teams.



Module Three

Public Security Providers



The presence of public security providers can bring about a number of risks and negative impacts for communities. These are often disproportionately felt by women and other disadvantaged groups, and can be further exacerbated in conflict-affected and high-risk settings. There are a number of actions that companies can take, to help prevent or mitigate the occurrence of these risks and negative impacts, and to ensure appropriate and adequate measures where abuses occur.

Objectives of Module 3

The Public Security Providers Module helps companies:

- Identify opportunities and strategies for engaging security providers and host-country governments on the security and human rights of women and other disadvantaged groups; and
- Promote the integration of security and human rights risks for women and disadvantaged groups into VPs implementation.

The Module is composed of the following steps:

- Step 3.1: Plan for engagement with public security providers regarding risks to women and other disadvantaged groups
- Step 3.2: Engage with public security providers
- Step 3.3: Assess gaps and identify possible solutions
- Step 3.4: Work with public security advisers on deployment and conduct
- Step 3.5: Respond to human rights abuses
- Step 3.6: Address public security provider challenges

Before You Get Started

Ensuring the Right Knowledge, Expertise and Resources are Available to Staff and

Security Personnel

Many company staff – including security managers and personnel – are not equipped with the right knowledge and expertise for applying a gendered lens or integrating specific considerations for disadvantaged groups into their overall mandate and day-to-day actions. As such, companies should invest in resources for departments involved in applying the VPs to carry this out. This can include providing regular access to experts (whether as permanent staff or consultants) who can provide guidance; training at various staff levels to ensure adequate understanding and recognition of the importance of equality, inclusion, non-discrimination, and the rights of disadvantaged groups; and, effective tools and guidance that employees can use in their day-to-day work.



Public Security Providers

Step 3.1 Plan for Engagement with Public Security Providers Regarding Risks to Women and Other Disadvantaged Groups

The IGT offers a framework through which companies can create an action plan for engaging with public security providers. Below are additional considerations for how companies can plan for embedding the security and human rights of women and other disadvantaged groups into this engagement.

Tool 3.1A

Plan for Engagement with Public Security

Desired outcome(s) for interacting with public security	Steps you could take	Which steps do you think you'll take?
<p>Clear Communication on Expectations and Commitments – Governments and public security providers are aware of company expectations and commitments to respect the rights of women and other disadvantaged groups.</p>	<ul style="list-style-type: none"> • Identify and communicate relevant policies and procedures that demonstrate company expectations and commitments. These should include those relating to things such as: <ul style="list-style-type: none"> ◦ Prevention of Sexual Exploitation and Abuse ◦ Anti-discrimination ◦ Gender equality • Identify any potential points of resistance on the part of the government/public security forces • Involve levels of senior management/head office to demonstrate high-level buy-in to these expectations and commitments • Engage multiple departments within the company to ensure coherence and coordination on policies procedures related to these expectations and commitments • Other: 	
<p>Understand How Public Security Providers Will Handle Incidents of Rape and Other Forms of Sexual Violence – Public security providers have the resources and expertise required OR gaps/needs are identified and addressed.</p>	<ul style="list-style-type: none"> • Assess the capacity of public security providers (see Tool 3.3 below) • Prepare a list of measures, best practices, and resources that are needed for effectively supporting rape survivors • Identify organizations that could support or provide capacity building to law enforcement and public security providers to improve their ability to respond to incidents of rape and other forms of sexual violence • Other: 	

Tool 3.1A (continued)

Desired outcome(s) for interacting with public security

Steps you could take

Which steps do you think you'll take?

Inclusive Company Communications – A clear communications plan for sharing information with women and other disadvantaged groups on the role of the company vis-à-vis security, its commitment to the VPs, and expectations and processes (e.g., grievance mechanisms) is prepared.

Understand the History of Conflict and Links to Public Security – The company adequately understands how previous/ongoing conflict affects/affected women, girls and other disadvantaged groups (this includes specifically the involvement of public security providers in sexual and gender-based violence, whether as members of the public security provider, or as ex-combatants integrated into the public security force or former private security guards).

- Create a timeline for creating the plan and identify those who should be involved
- Engage representatives of various groups on the communications plan
- Consider inclusive communication methods for women and disadvantaged groups (refer back to Tool 1.3)
- Other:
- Complete conflict analysis/desk-based research on public security in the particular country AND the particular location (including identifying potential individuals of concern who may currently be employed within the public security provider)
- Engage knowledgeable individuals (human rights organizations, community organizations, etc.) to identify potential abuses that may not have been reported
- Identify key messages or requests to make to public security providers to mitigate any concerns (e.g., dismissal of individuals, redeployment of individuals where dismissal is not pursued, etc.)

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Identify Potential Challenges and Set Realistic Objectives

Companies should assess and anticipate potential reticence on the part of host-country governments and public security providers with respect to the rights of women and other disadvantaged groups and create a realistic plan in response. For example, there remain many country contexts in which the rights of Indigenous people or members of the LGBTQI+ community are not recognized. In worse cases, these groups are specifically targeted by host-country governments and public security providers via harmful laws, rhetoric and violence. In these contexts, it is useful for companies to identify realistic and progressive steps that can be taken when they engage with host country governments and public security providers on the human rights risks to women and disadvantaged groups. While companies are not expected to solve these challenges individually or quickly, they should identify opportunities for progressively challenging harmful and discriminatory views towards women and other disadvantaged groups, and most importantly,

to ensure they do not contribute to exacerbating or further entrenching them. Some examples of steps that a company can take include:

- Highlighting references to women and other disadvantaged groups when sharing company policies;
- Identifying multistakeholder platforms where collective concerns can be raised, either directly or indirectly (e.g., In-Country Working Groups of the VPSHR);
- Identifying preliminary opportunities for privately raising concerns or issues as part of a larger discussion agenda;
- Hosting a preliminary discussion or dialogue on the specific risks and negative impacts for women and other disadvantaged groups;
- Inclusion of this topic as a regular agenda item during regularly scheduled meetings with security providers;
- Integrating specific recognition of women and other disadvantaged groups within agreements with public security providers;



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- Requesting representation in staffing of public security providers (e.g., women police officers), or the deployment of units that are trained to engage with women and other disadvantaged groups (e.g., women and youth units);
- Promoting the integration of considerations for women and disadvantaged groups into existing training for public security providers;
- Promoting targeted training on gender equality and the rights of women and/or other disadvantaged people for security providers;
- Making a public statement in support of progressive laws, regulations or policies that advance the security of women and other disadvantaged groups;
- Making a public statement against oppressive existing or proposed laws, regulations or policies that may limit the rights of women and/or other disadvantaged people or negatively affect their security; and
- Providing support or working collaboratively with human rights organizations and defenders seeking to improve the legal and regulatory landscape to better protect the rights of women and other disadvantaged groups.

Identify Potential Collaborators

Companies can collaborate with other companies, civil society organizations (with an emphasis on those that are representative of women and disadvantaged groups) and the donor community to collectively raise and address the particular risks facing women and other disadvantaged groups, as well as to share best practices and effective policies and procedures. When engaging with host governments, companies may also wish to broaden their communications and engagement plans to include other relevant government ministries, such as ministries responsible for women, youth and/or Indigenous peoples, in order to garner additional acknowledgement and support.

TIP

Incorporating Women and Disadvantaged Groups into Corporate Security Policies

While many companies have adopted a wide range of policies aimed at promoting inclusion, diversity and human rights, as well as combatting various forms of discrimination and sexual harassment or violence, many have not yet considered or recognized potential adverse impacts on women and other disadvantaged groups in their security policies. Given the extent to which security policies can serve as a key driver of engagement between companies and public security providers, it is recommended that companies explicitly integrate provisions related to the security and human rights of women and other disadvantaged groups directly into their security policies.

Step 3.2 Engage with Public Security Providers

The IGT outlines a number of engagement tasks for companies to carry out with public security providers. Below are a number of considerations for companies to consider with respect to the security and human rights of women and other disadvantaged groups while carrying out these tasks.

Communicating Company Policies, Commitments and International Normative Frameworks

When engaging with public security forces and host-country governments, companies should share their particular policies and procedures related to the rights of women and other disadvantaged groups, including expectations and commitments to gender equality, addressing discrimination and the importance of preventing sexual abuse and exploitation, amongst others. This includes discussing relevant international normative frameworks protecting the rights of particular populations that may inform their policies, for example the *United Nations Declaration on the Elimination of All Forms of Racial Discrimination*, the *International Convention on the Elimination of All Forms of Racial Discrimination* or the *United Nations Declaration on the Rights of Indigenous Peoples*, and what this means in practice for public security providers.

Establishing Relationships with Public Security Providers

The IGT highlights the importance of establishing working relationships with public security providers, particularly at the local level. While this is important, companies should consider the ways in which these interactions may be perceived by local communities. Where individuals within public security forces have either been involved directly in sexual and gender-based violence – or where they have been viewed as creating a permissive environment for these abuses to take place – there is a risk that company engagement with such individuals could create significant distrust with local community members, and with women and girls in particular, especially where they have been the specific targets of such acts. Advanced research and conflict analysis should be conducted prior to the establishment of these relationships, and risk assessments should carefully consider this dynamic.

Optimizing Agreements with Public Security Providers

Signing agreements with public security providers, such as Memorandums of Understanding (MoUs) have become common practice for many companies, and is recommended in the IGT. These agreements provide an excellent opportunity for companies to communicate their commitment to ensuring the rights of women and other disadvantaged groups are protected, and that negative impacts that they may experience are mitigated. These considerations may be integrated by:

- Including specific reference to women and disadvantaged groups when referring to protecting human rights in a preamble or introduction.
 - E.g., “The signatories to this agreement recognize the importance of actions consistent with the terms of the Voluntary Principles on Security and Human Rights, promoting and protecting human rights and fundamental freedoms, and the principle that security is a fundamental need shared by all members of society alike, **regardless of gender, age, ethnicity, religion, cultural identity, sexual orientation, or other identity.**”
- Including reference to specific standards or principles related to the human rights and security of women and other disadvantaged groups.
 - E.g., *Declaration on the Elimination of Violence against Women*, the *Convention on the Rights of the Child* or the *United Nations Declaration on the Rights of Indigenous Peoples*.
- Including reference to specific, contextually and culturally relevant training for interaction with women and other disadvantaged groups, such as prevention of sexual exploitation and abuse training, gender equality training, and diversity training.



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- Including specific reference to gender-based violence within screening practices for government security forces.
- Including a specific reference to gender-based violence and sexual misconduct as necessitating swift communication with the company and follow-up investigation and resolution.
- Including a specific reference to the provision of medical care and support services (i.e., financial or legal) for the injured in a manner that is respectful and considerate of the particular needs of women and other disadvantaged groups. This may also include a commitment to providing additional resources for psychosocial support to those injured, particularly survivors of sexual violence.

Sample Clauses

- Security providers shall not engage in the exchange of money, promises of employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behaviour.
- Before being deployed, public security providers shall receive dedicated training on preventing sexual abuse and exploitation.
- Public security providers shall be notified by the company where any complaints have been received alleging abuse by public security providers. The company may, at its discretion, refrain from disclosing the name or other identifying information to public security providers, unless authorized by the complainant.

Due Diligence for Public Security Providers

While the IGT encourages companies to carry out due diligence on private security providers, it is less explicit for public security providers. It is imperative that companies gather information, to the best of their ability, on particular individuals or units within public security providers in order to identify those with a poor human rights record towards women and other disadvantaged groups. In countries that lack effective infrastructure or access to information for carrying out in-depth screening processes – such as criminal background checks – companies will need to identify other potential information sources. These might include conducting interviews with personal references or local community members, past employers, conducting local media scans or identifying other sources of information, such as UN country reports (e.g., UN Group of Experts) or NGO reports, that have raised concerns over specific individuals.

Companies should consider both proven or alleged instances of harms, as women and other disadvantaged groups may be less likely to report

abuses against them, and where they do, they are not always investigated, prosecuted or tried. This is especially the case for instances of sexual violence. Women and other disadvantaged groups should be directly engaged within these processes in a manner that does not jeopardize their safety or expose them to further risk of harassment or retaliation. To do this, companies should ensure that there is an appropriate plan for if and how individuals will be contacted and consulted, and put in place requirements for respecting privacy and safeguarding individuals providing information on public security providers.

Encouraging Diversity and Representation within Public Security Providers

As much as possible, companies should encourage representative, diverse and inclusive hiring practices for public security providers. This encouragement can be expressed more formally within agreements with public security forces, whenever possible. Where this is not possible, companies should at a minimum open a dialogue with host-country governments and public security providers.

There are many benefits to having a diverse and representative workforce amongst security providers, especially as it can help ensure that gender and culturally sensitive practices can be performed by the providers. For example, women who are apprehended by security providers and where a search is lawful and appropriate, may prefer to be searched by a women security provider. At the same time, it is important to recognize that in some contexts, discriminatory views and power dynamics could actually create great risk for security providers who identify with a particular

disadvantaged group. As such, a company should ensure that their encouragement of inclusion, diversity and representation is underpinned by additional encouragement (and financial support, where available) for continuous sensitization and training for staff and a commitment to creating safe spaces via policy frameworks and effective monitoring and accountability frameworks. Without these, attempts to encourage diversity and inclusion amongst security providers may simply be viewed as a box-ticking exercise and actually put individuals at risk.

Step 3.3 Assess Gaps and Identify Possible Solutions

Tool 3.3 in the IGT helps companies to identify capacity constraints for public security providers vis-a-vis implementation of the VPSHR. Below is an additional tool that can be applied to carry out a rapid assessment of the ability of public security providers to implement the VPSHR in a manner that is sensitive to women and other disadvantaged groups.¹²

Tool 3.3A

Rapid Assessment Tool to Assess the Responsiveness of Public Security Providers to Women and Other Disadvantaged Groups

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Policy Framework/Commitment to Inclusion				
Does the public security provider have the following policies (or comparable policies) in place? <ul style="list-style-type: none"> Code of Conduct Prevention of Sexual Exploitation and Abuse Anti-harassment Anti-discrimination Anti-racism or ethnic profiling 		E.g., The public security provider is bound to a Code of Conduct established by the government in 2017, which includes provisions on harassment, discrimination and racism.		E.g., The Code of Conduct of the military does not include specific provisions for PSEA. The company will raise this during subsequent meetings with the public security provider to encourage adoption of PSEA provisions into the Code of Conduct (or via a separate policy document).
Has there been any indication that the public security provider recognizes and prioritizes the importance of properly addressing gender-based violence?		E.g., The army has recently held a series of workshops to discuss gender-based violence committed by members of the armed forces. Next steps could include proposing new policy/training/complaints hotline/etc.		E.g., The local police force has not prioritized this issue; potential next steps are to raise during local security meetings/schedule a dedicated meeting/meet with local women's associations to identify priorities/etc.

¹² This tool was created via the adaptation of DCAF's Gender-Self Assessment Guide for the Police, Armed Forces and Justice Sector: https://www.dcaf.ch/sites/default/files/publications/documents/self_assessment_guide.pdf.



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Tool 3.3A (continued)

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Are there equipment management procedures in place to ensure that public security providers do not use equipment in ways that violate the rights of women and other disadvantaged groups (e.g., weapons, uniforms, vehicles, cameras – both visible or undetected, recorders, etc.)?		E.g., The public security provider has shared an equipment management plan/policy; the company has observed strict adherence on security premises/etc.		E.g., Share examples of equipment management plans from the company or other sources/support development of procedures or policies.

Inclusion/Ability to Respond to Diverse Needs of Women

What is the number (or percentage) of women staff within the deployed security force?				
Is this adequate for ensuring the availability of women staff to deal with any incidents that require their specific presence (e.g., search of a detained person, escort of detained person to the toilet, support for a survivor of sexual abuse in distress, etc.)?				
What training do public security providers receive on specific forms of gender-based violence, including human trafficking, family violence and sexual assault?				
Are there special units/services to address gender-related crimes, such as anti-trafficking squads, or family support units? If yes, are they fully staffed and adequately resourced?				

Tool 3.3A (continued)

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Does the public security provider have adequate resources to respond to sexual violence (e.g., rape kit, counselling staff, coordination with social workers, etc.)?				
What facilities does each public security provider have for receiving complaints of and investigating gender-related crime (for example, private interview areas, forensic support, translators, detention facilities)? Are these facilities adequate? What are the conditions for women, men, girls and boys?				
Are survivors of gender-related crime able to file a report in their own language?				
Do the public security providers recognize the need to ensure the privacy rights of survivors of sexual violence?				
Have there been reported cases of gender-based violence carried out by the respective public security force? Have these been addressed? Have perpetrators been sanctioned? Have the survivors received adequate reparations?				
How far is the nearest location to report an incident? Are there any barriers for women to get to these locations (e.g., not within walking distance, cannot afford transport, cannot ask for friends or family to help with transport)?				



Public Security Providers

Tool 3.3A (continued)

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Are there any other potential barriers that may disproportionately discourage women from reporting cases of sexual violence (e.g., fee to make a claim/report, medical examination fees, judicial fees, translation fees, etc.)?				

Protection and Well-Being of Women Security Providers

<p>Have measures been put in place in order to ensure the safety and well-being of women security providers, including but not limited to:</p> <ul style="list-style-type: none"> • Equipment adapted to the needs of women; • Tailored shifts/partnering to maximize safety (i.e., women are not deployed to dangerous areas/situations that could be dangerous to them alone); • Shifts that are conducive for safe transport to and from work; and • Change in responsibility/tasks to accommodate the needs of pregnant/breastfeeding security providers? 				
Are women and men paid equally? Do members of minority groups receive less pay? Are women and other disadvantaged groups promoted or present in senior-level positions?				
Is an internal grievance or complaints mechanism available to women security providers (or those from other disadvantaged groups) who experience harassment, intimidation bullying or sexual and gender-based violence?				
Do security providers receive gender equality training?				

Step 3.4 Work with Public Security Providers on Deployment and Conduct

While companies do not have direct control over public security providers, they can have considerable influence on their conduct by offering training and capacity building opportunities that can promote respect for the rights of women and other disadvantaged groups, and ensure they are prepared to safeguard survivors of abuses should they occur. This section outlines a number of considerations with respect to working with public security providers on their deployment and conduct within the implementation of the VPSHR.

Equipment and Facilities

The VPSHR require that companies evaluate the risks of providing both lethal or non-lethal equipment to public security providers, including whether or not public security providers have “adequate controls to prevent misappropriation or diversion of equipment which may lead to human rights abuses”.¹³ In evaluating these risks, companies should consider the extent to which both lethal and non-lethal equipment could potentially be used by public security providers in committing abuses against women and other disadvantaged groups, and how these can be mitigated. Furthermore, companies should consider the extent to which

facilities used by public security providers are conducive to ensuring a safe environment for women and individuals from other disadvantaged groups. For example, are there separate bathrooms or changing rooms that are provided for women and men? Are these properly maintained (e.g., properly stocked, working locks on bathroom stalls, etc.)? Are these adequately identified with appropriate signage? Is there appropriate lighting in areas where public security providers are posted, particularly for those working overnight shifts? Scenario 2 provides an illustrative example on the use of non-lethal support provided to public security providers.

SCENARIO 2: USE OF NON-LETHAL SUPPORT PROVIDED TO PUBLIC SECURITY PROVIDERS

David

David works as a police officer and has been assigned to provide security at an oil operation that is located in his community. Through an agreement with the oil company operating at the site, he has been provided with a uniform. While the uniform has been provided to him for use during work hours, he is not required to return the uniform at the end of his shift. David soon realizes that the uniform provides him with a certain level of authority while he is out in the community. He uses it when engaging with young women in the community, and tells them that he can get them a job in return for sexual favours. With limited economic prospects in the area, many young women are lured by the prospects of economic security.

Mitigation Measures:

To avoid this situation, companies should:

- Incorporate into their agreements with public security providers the appropriate parameters for the use of equipment provided by the company, such as the prohibition to use uniforms or other equipment outside of working hours or the company premises;
- Require equipment management procedures be followed, such as documentation and signing out uniforms;
- Provide a change area where officers can change in and out of (and store, if washing facilities are available) their uniforms before and after their shift; and
- Request that officers sign a declaration that uniforms will not be used outside of work hours.

¹³ The Voluntary Principles on Security and Human Rights, p.3 https://www.voluntaryprinciples.org/wp-content/uploads/2023/03/Voluntary-Principles_ENG.pdf



Public Security Providers

Training for Public Security Providers

Training for public security providers is often conducted in a manner that emphasizes the human rights of all – without nuancing the particular challenges that face women and other disadvantaged groups in realizing their rights. Companies should proactively advocate for any training of public security providers to explicitly include the rights of women and other disadvantage groups, as well as the specific risks and impacts that they uniquely or disproportionately face. Companies should also consider contributing resources, where possible, that can help to ensure more robust training in this area.

Furthermore, training should be culturally relevant and gender sensitive, and account for prevailing norms, roles and values while also being cautious of not reinforcing those that may be harmful to women and other disadvantaged groups. Training should also be responsive to the particular risks that have been identified in the country or area of operation. For example, in contexts where human rights defenders or labour rights activists are often targeted for their advocacy work, this should be given additional attention within the content of the training and its execution. Additional consideration should be made for public security providers who are coming from outside the country, and may require cultural sensitivity training.

Where companies are resource constrained, there are publicly available resources that may support the development of training sessions for public security providers. Other resources may be available via memberships in various platforms and initiatives. For example, the International Code of Conduct Association (ICoCA) offers free online [PSEA training course](#) for its membership. Where multiple companies are operating in the same location, they may wish to invest in the co-development of training resources.

Companies should also explore innovative ways of delivering training or conveying information to public security providers, where they have support from host country governments. In some contexts, more formal classroom-style training may be less suitable for the target audience – particularly where there are low rates of formal education. Companies may want to explore the use of locally-used apps or other forms of mobile technology that could support targeting information sharing on particular issues via short videos or audio clips. Other options include the use of locally-derived visualizations or community theatre, which in some contexts, can be very effective for addressing what are sometimes difficult or sensitive subjects.

Communicating with Women and Disadvantaged Groups

It is imperative that security arrangements are transparent and are clearly communicated in a manner that is accessible and understood by women and other disadvantaged groups. Information regarding security providers, their role at the site and in the community, as well as channels for voicing concerns, filing grievances and other accountability mechanisms should be well known and understood. Companies should refer back to the recommendations established in Module 1 to ensure they are creating conducive environments for the meaningful participation of women and other disadvantaged groups in any communication with communities on the presence of public security providers.



Establishing Special Protection Units

In contexts with high rates of sexual and gender-based violence, companies may want to consider advocating for and supporting the creation of special protection units that are designed to support particularly disadvantaged or marginalized individuals. For example, the Liberian National Police established Women and Children Protection Units comprised of specially-trained individuals placed within police stations who were responsible for supporting women, girls and boys who have experience in sexual and/or gender-based violence. Companies could support the development of such units by first consulting with relevant target groups to assess their support for such units, advocating alongside these groups for the creation and resourcing of such units, and providing resources to support their creation (so long as these consider guidance with respect to the provision of financial and equipment support to public security providers).

In jurisdictions like the Democratic Republic of Congo, where the national police has concurrently created specialized child protection and prevention of sexual violence squads that are specially trained in survivor-sensitive techniques alongside specialized mining police that are mandated to protect artisanal- and large-scale mining sites, it is important that companies urge the effective training and collaboration of the various police units, as well as encourage these police units to establish ties and referral mechanisms to relevant social services to meet vulnerable persons' protection needs ([Pilot Trainings Address the Role of Police in Preventing the Worst Forms of Child Labour | Knowledge Hub](#) (securityhumanrightshub.org)).



Public Security Providers

CASE STUDY 4

Integrated Community Based Security - bp Tangguh Project

The following case study illustrates a proactive community-based approach to strengthening security around an extractives project.

bp has been operating the Tangguh Liquefied Natural Gas (LNG) project in West Papua since 2005. bp established the Integrated Community Based Security (ICBS) program to limit the deployment of security personnel in the vicinity of the project and to minimize the potential for conflict through partnerships between local communities, NGOs, National Commission on Human Rights – Papua Chapter, police and other stakeholders. The ICBS establishes shared responsibilities in maintaining security and local communities, government bodies, and security forces are all given a role in resolving conflict issues. The ICBS was developed through local, regional and national consultations and is based on an Indonesian police doctrine referring to a model of community policing that had never previously been used to provide security at a major extractive site.

The ICBS was one of the first applications of the VPSHR and has become a model program because of its systemic approach to human rights and its establishment of principles that has won support not only from the community and NGOs but also from the police and military in the region. bp has made the following commitments with regard to ICBS:

1. The use of unarmed 'inner ring' security officers, many are Papuans from the local area, for everyday security of the project;
2. A commitment to only call the police, not the military, and only if a security problem escalates; and,
3. The provision of human rights training (including the VPs and the United Nations Basic Principles on the Use of Force) for ICBS, police and military personnel who would be called in if a security incident were to intensify.

For more information on the ICBS, see bp's Indonesia Community page [here](#).



Step 3.5 Respond to Human Rights Abuses

Despite preventative measures, security-related human rights incidents can occur and companies need to prepare for how to respond. This includes providing effective safeguarding to ensure the physical, mental, social and economic well-being of alleged victims – recognizing the specific and unique needs of women and individuals from other disadvantaged groups. Advanced knowledge and understanding of available services and resources for survivors can help companies to establish an effective and holistic approach to responding to incidents – particularly when they require immediate action, such as medical care. Tool 3.5A provides a set of questions that can guide companies in developing their approach to responding to security and human rights related incidents, including practical and logistical questions that – if thought through ahead of time – can make for a more effective response. The tool is presented based on an incident of sexual violence, however it can be replicated for other types of incidents on the basis of the same questions or modified questions tailored to that risk (e.g., incidents of intimidation by private security forces of human rights defenders, abuse of force against Indigenous peoples viewed as trespassing on a company concession, etc.). Note that Module 5 provides additional guidance for companies to assess potential barriers to their grievance mechanisms, as well as opportunities for removing these barriers.

Tool 3.5A

Developing a Safeguarding Approach in Responding to Security and Human Rights-related Grievances Example: Sexual Violence

Category of response	Guiding questions	Identified services/ partners/ gaps in support
Physical/Health	<ul style="list-style-type: none"> • Which local healthcare facility is best equipped to support survivors of sexual and gender-based violence? Are the following services offered; <ul style="list-style-type: none"> ◦ Treatment of traumatic wounds common in cases of rape; ◦ Treatment of sexually transmitted diseases; or ◦ Safe abortion or emergency contraceptives? • Who will accompany the survivor to health facilities? • In instances where local facilities are not adequate, where will survivors be transferred? <ul style="list-style-type: none"> ◦ Who will accompany them? Will they need lodging, travel support, subsistence support, etc.? • Are there particular barriers presented to accessing these facilities? (i.e., Do health facilities only treat people within a certain geographic boundary? Are they a women’s only facility, and therefore do not treat boys or men? Do survivors have to pay in advance for services?) • Are there concerns regarding confidentiality when using particular services (i.e., based on their capacity, practices, location, etc.)? 	



Public Security Providers

Tool 3.5A (continued)

Category of response	Guiding questions	Identified services/ partners/ gaps in support
Emotional/ Psychosocial Support	<ul style="list-style-type: none">• Which local services are available to accompany survivors of sexual violence with culturally-appropriate counselling services?• Are there particular barriers presented to accessing these facilities? (i.e., Do local services only treat people within a certain geographic boundary? Do they only treat people of a certain religion or cultural grouping? Are they a women's only service, and therefore do not treat boys or men? Are they able to provide counselling appropriate for girls and boys?)• Are there services available for both immediate and urgent care (e.g., SOS hotline, 24-hour clinic, etc.), as well as medium and longer-term services (e.g., local support groups)?• Are survivors able to access free services (e.g., via public services, employee insurance or assistance programs, etc.)?• Are services well or adequately funded (i.e., Do they have appropriate capacity? Are they frequently overcapacity?)	
Safety and Security	<ul style="list-style-type: none">• Are there services available for supporting survivors or witnesses who may need to relocate temporarily for fear of reprisal?• Is there a local organization, network or group that provides shelter to survivors of sexual violence who need a place to stay outside of their household?• Is there a communications plan or engagement plan with the survivor to communicate any safety or security concerns (e.g., providing a cell phone if a survivor does not have access)?• Are there safety and security concerns related to the survivor's interaction with police/public authorities? (e.g., Is there a risk that survivors themselves may be charged, jailed, abused or harmed in another way? Are authorities likely to immediately report to her husband without the consent of the survivor?)	

Tool 3.5A (continued)

Category of response	Guiding questions	Identified services/ partners/ gaps in support
Legal Assistance/ Access to Justice	<ul style="list-style-type: none"> • Are state/local authorities capable of carrying out investigations in a sensitive way? Would reporting alleged abuse to local authorities potentially lead to greater risk for the survivors (e.g., where there is complicity with local authorities, or where they are likely to blame the survivor)? • Are there public institutions or services available that provide free legal aid? • Are there public interest law firms or organizations that aid survivors of sexual violence reporting an incident and assist them throughout the legal process? • Are there costs associated with these services that are prohibitive? Are the services that are free limited in scope or time? • Are the services available in all local languages/adaptable to different cultural/ ethnic backgrounds? 	
Economic Assistance	<ul style="list-style-type: none"> • Do survivors have access to publicly funded or privately funded medical services (including both physical and mental healthcare), or are they required to pay out of pocket? • Is there access to sufficient economic assistance during time of recovery for victims (e.g., hospital stays, bed rest, etc.) to compensate for loss of income? For example, are there public financial assistance programs or alternatives (e.g., private insurance, etc.)? • Are income support services short, medium or long-term (i.e., would they support a survivor who is no longer able to work for a long period of time)? • Are there local organizations (e.g., community groups, NGOs, etc.) that provide support to survivors for social and economic reintegration following traumatic sexual violence incidents? 	



Public Security Providers

In addition to preparing a safeguarding and response plan, companies should also consider the following:

- Ensure that staff who may receive allegations are provided with training in handling sensitive allegations; this should include both staff with specific functions to receive allegations (i.e., those responsible for operating community-based grievance mechanisms), but also staff who are community-facing and may be recipients of or interact with those making allegations. Staff should be well versed on the appropriate measures to take in particular instances, guided by an effective safeguarding plan.
- When determining the credibility of an allegation, companies should consider the extent to which the identity of an individual may influence whether or not the allegation is viewed as credible. Women and individuals often face additional scrutiny of their claims that are rooted in discriminatory views and harmful stereotypes – particularly when these claims relate to forms of sexual violence. Challenging harmful stereotypes, such as those that place blame at the hands of survivors or that tend to discredit allegations, should be explicitly addressed in the training of staff receiving allegations.
- Companies should ensure that those investigating complaints against public security providers have the appropriate expertise required, particularly as it relates to engaging with potentially vulnerable populations or investigating particular types of allegations (e.g., sexual violence). For example, if alleged abuse involves young girls or boys, those involved in the investigation need specific experience and skills to safeguard alleged survivors. Furthermore, investigative teams should have the appropriate understanding of the local context as well as language – or alternatively be provided with an appropriate local team that can assist them in this manner. More often than not, this type of experience or expertise companies may not have amongst their own staff, and therefore, external experts should be sought as needed.
- As noted in the IGT, all allegations should be properly recorded. While the IGT provides a sample incident report template, a more comprehensive example has been included in Annex B - Tool 3.5B).
- Companies should emphasize that breaches in confidentiality of individuals reporting an incident - including women and other disadvantaged groups - could result in significant harm to these individuals. Consequences for intentionally breaching such confidentiality, such as suspension or dismissal, should be clearly communicated to all staff.

Step 3.6 Address Public Security Provider Challenges

Companies can encounter a number of challenges in their relationships with public security providers, when it comes to addressing risks to women and other disadvantaged groups. Below, we outline some common challenges that can be encountered, and suggestions for how these may be addressed. As noted above, in many contexts, inequality and exclusion of women and other disadvantaged groups may be deeply entrenched in socio-cultural norms and rules.

Table 5:

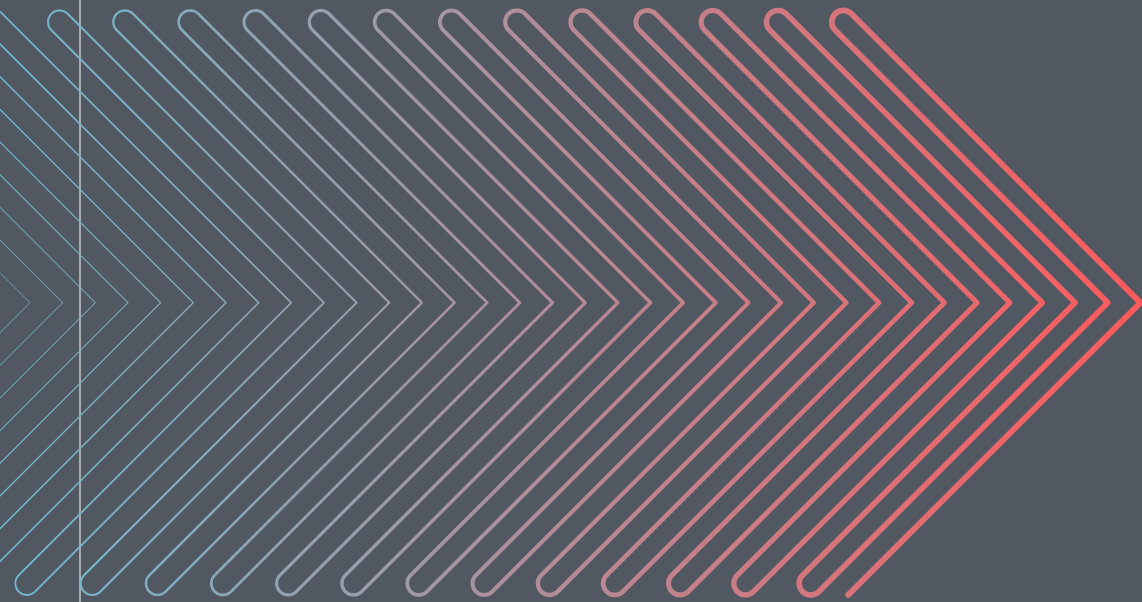
Common Challenges and Responses

Common Challenges	Company Responses to Address Common Challenges
<p>The national government shows little interest in addressing specific challenges within its public security sector that are negatively affecting women and girls, such as sexual harassment or sexual and gender-based violence.</p>	<ul style="list-style-type: none"> • Re-emphasize company commitment and policies to the VPSHR, and specifically how these relate to sexual harassment and sexual and gender-based violence. • Engage with other government ministries or departments that may be more receptive to these concerns, such as those responsible for women, children or human rights. They may be able to help raise these concerns with their government counterparts. • Where an in-country VPSHR working group exists, raise these concerns with potential allies in order to promote a coordinated approach to addressing this concern. • Where there is no in-country VPSHR, identify other potential allies such as organizations working on security sector reform, human rights or other related issues in order to collaborate and coordinate on encouraging the government to act on this issue. • Identify opportunities for supporting broader community sensitization and training on preventing sexual harassment/sexual and gender-based violence that allows members of the public security sector to participate and benefit, without singling them out.
<p>Local authorities are hesitant to allow women to meaningfully participate in community consultations related to security and human rights issues.</p>	<ul style="list-style-type: none"> • Identify opportunities for encouraging local authorities to reconsider their position in a manner that is appropriate and does not lead to tension. This should be done in a way that opens a dialogue and carefully explains why the meaningful participation of women is needed and beneficial. • Identify potential influential voices or individuals with whom traditional authorities have significant trust to also encourage a change in position. • Identify opportunities for supporting local community organizations to address this issue in ways that are culturally appropriate (e.g., community theatre or community discussion groups, etc.).
<p>Local public security providers are ill-equipped to respond to cases of sexual violence, such as rape.</p>	<ul style="list-style-type: none"> • Identify gaps in resources, and identify whether it is feasible for the company to help fill these (e.g., offer training, covering the costs of counselling support, etc.). • Identify potential community organizations – such as local women’s associations or networks – that may be able to play a role in supporting survivors of sexual violence with support from the company. • Encourage and financially support the use of special protection units for women.



Module Four

Private Security Providers



While the use of private security providers on site can present an opportunity for mitigating some security and human rights risks for women and other disadvantaged groups – particularly where public security providers have a poor human rights record – it can also create risks. This is especially the case where private security providers lack awareness, understanding and capacity to ensure the protection of women and other disadvantaged groups from security and human rights harms, as well as an adequate policy and accountability framework that promotes good practice. This module guides companies on how to embed the security and human rights of women and other disadvantaged groups in their selection and use of private security services.

Objectives of Module 4

The Private Security Providers Module helps companies:

- Embed considerations for women and other disadvantaged groups within their overall framework for defining private security needs and identifying a provider; and
- Manage interactions between private security providers and women or individuals from other disadvantaged groups.

The Module is composed of the following steps:

- Step 4.1: Define and assess private security requirements
- Step 4.2: Conduct due diligence and select/contract a private security provider
- Step 4.3: Deploy and monitor selected private security provider
- Step 4.4: Respond to private security provider misconduct
- Step 4.5: Address private security provider challenges

Considerations Before You Get Started

Since the creation of the IGT, there have been a number of key developments with respect to the governance and regulation of the private security sector, including with respect to issues most pertinent to women and other disadvantaged groups. For example, with respect to home-state regulation, Switzerland adopted the [Federal Act on Private Security Services Provided Abroad](#) in 2013, and has since required that entities that fall under this law provide evidence that their staff have received sufficient training in international human rights law and international humanitarian law, including the prohibition of human trafficking, sexual exploitation/abuse and gender-based violence. Private security providers may also be subjected to particular laws or regulations in their country of operation, and these should be well understood by companies using private security providers.

The creation of the International Code of Conduct Association (ICoCA) in 2013 has also provided an additional forum for companies, governments and civil society organizations – both private security providers and users of private security providers – to discuss specific to issues within the private security sector, and to access resources for capacity building. Companies implementing the VPSHR should consider how they or their contractors can engage with the ICoCA and embed the requirements established with the International Code of Conduct for Private Security Service Providers – the founding Code of the ICoCA – into their relationships with private security providers.



Private Security Providers

REMINDER

Understanding the Role and Limitations of Private Security Providers

As noted in the IGT, it is important for companies and other implementers of the VPSHR to understand the specific role of private security, as well as the limitations that are placed on private security providers via national and international legal and regulatory frameworks. These often differ significantly from the role of public security providers. For example, the use of firearms by private security providers may be prohibited or restricted in certain countries, and permissions for use of force can differ substantially between private and public security providers. Companies should ensure that they thoroughly understand this context, and that there is sufficient understanding with and between Private Military and Security Companies or PMSCs, public security providers and local stakeholders as well – including women and other disadvantaged groups.

Step 4.1 Define and Assess Private Security Requirements

Companies should strive to involve local community members in defining their security needs as well as in early identification of potential reservations or concerns that communities may have. This includes prioritizing the involvement of women and other disadvantaged groups within these discussions so that they can share their views. The risk assessment conducted in Module 2 should underpin the determination of whether and what type of private security is needed. Where a company's risk assessment explicitly integrates the needs and risks posed to women and other disadvantaged groups, it is more likely that these risks will be meaningfully imbedded in deliberations about the scope and scale of private security. Below is a set of additional questions intended to complement those in Tool 4.1 *Defining and Assessing Private Security Requirements* of the IGT by prompting users to reflect on the needs and risks to women and other disadvantaged groups.

- What risks does the presence of private security bring to local community members, particularly women and other disadvantaged groups? Can these be mitigated, in part, by reducing the size of private security contingents? Are there particular areas or locations where their presence may pose greater risk for women and other disadvantaged groups? What other ways can these be mitigated within the design of a private security plan (e.g., non-armed guards, training, etc.)?
- Will there be women security providers, or security providers from another disadvantaged group? If so, what measures need to be put in place to support a safe working environment for them?
- What is the level of awareness or understanding of private security providers in the area or country of women's rights, gender equality, inclusion, prevention of sexual exploitation and abuse, etc.?
- Are private security providers in the local area and/or country likely to include individuals who have previously been involved in conflict (either on the part of state public security forces or non-state actors)?
- What investments might be needed to help ensure private security providers are equipped to respect and prioritize the security and human rights of women and other disadvantaged groups?



Private Security in Armed Conflict Situations

Companies implementing the VPSHR and their private security personnel and providers who are working in areas experiencing armed conflict need to consider the obligations of PMCs to respect international humanitarian and human rights law – including those that offer specific protection for women and other disadvantaged groups. Companies should consult the [Montreux Document on Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict](#), which though directed towards states, provides helpful information to understand these obligations. Additional resources can be found on the [Montreux Document Forum](#) website.

Step 4.2 Conduct Due Diligence and Select/Contract a Private Security Provider

Once private security needs are defined, the procurement process for identifying a provider offers a significant opportunity for companies to articulate their commitment to safeguarding the security and human rights of women and other disadvantaged groups. Companies should include clear evaluation requirements when soliciting bids or proposals for contracts, such as asking bidders to provide evidence of a policy or Code of Conduct that contains a zero-tolerance policy for sexual and gender-based violence, provide evidence of effective internal procedures for addressing complaints related to sexual violence, gender-based violence and discriminatory practices, or provide evidence of screening processes for employees that includes a history of sexual and gender-based violence or discrimination.

As part of this due diligence process companies may also compel contractors to share specific documentation in order to confirm their implementation of certain policies and procedures, such as records of training sessions, a Code of Conduct with provisions related to sexual exploitation, violence, abuse and discrimination, or other related policies. Companies hiring private

security providers should use the [International Code of Conduct Association \(ICoCA\)](#)'s Code (see text box on the next page) and 10-point selection as tools for engaging with private security providers (e.g., checklist covers evaluation requirements like policies and procedures, certifications, recruitment and training, etc.).



Private Security Providers

International Code of Conduct for Private Security Service Providers

The [International Code of Conduct for Private Security Providers](#) (“the Code”) contains a set of commonly agreed upon principles for the conduct of private security providers. The Code is governed by the [International Code of Conduct Association](#) (ICoCA), and provides an operational framework for members and affiliate companies to operate in a manner that is consistent with national and international laws, regulations, and standards of business conduct with respect to human rights – particularly when operating in complex environments. Paragraph 38 of the Code includes explicit language related to the prevention of sexual exploitation and abuse, and recently the ICoCA released [Guidelines for Private Security Providers on Preventing and Addressing Sexual Exploitation and Abuse](#) which provide private security providers adhering to the Code with additional guidance on this specific topic.

Companies hiring private security providers should use the ICoCA Code as a tool for engaging with private security providers. Where capacity amongst local security providers is limited or lacking, companies can work with different stakeholders to help progressively improve the performance of the sector via trainings and capacity building. Clear benchmarks can be established against the VPSHR and the Code, in order to promote a progressive improvement approach, as well as to establish clear expectations and accountability for adherence to the Code.

Enhanced Screening Practices for Private Security Providers

The IGT encourages companies to gather information on individuals within private security providers in order to identify individuals or companies who may have poor human rights records. In countries that lack effective infrastructure or access to information for carrying out in-depth screening processes – such as criminal background checks – companies will need to identify other potential information sources. These might include conducting interviews with personal references or local community members, local civil society organizations, past employers/clients or conducting local media scans. In conflict or post-conflict contexts, companies should be especially cautious about past incidents involving individuals who previously held positions in public security forces, and whose presence may create tension and mistrust within particular communities and amongst women and other disadvantaged groups in particular. Companies may also consider using third-party services to support their due diligence processes, especially those that specialize in human rights due diligence.

As noted in Step 3.2 with respect to public security providers, due diligence and screening practices should strive to include both proven or alleged instances of harms, particularly in relation to sexual and gender-based violence or harms against marginalized and disenfranchised groups, which are often not investigated, prosecuted or tried in many countries. Companies should identify opportunities for women and other disadvantaged groups wanting to be involved in such processes or engagement to do so in a manner that does not jeopardize their safety or expose them to further risk of harassment or retaliation. To do this, companies should ensure that there is an appropriate plan for if and how individuals should be contacted and consulted, and put in place clear guidelines and requirements for respecting privacy and safeguarding individuals participating in due diligence processes.

Embedding Considerations for Women and Disadvantaged Groups within Agreements with Private Security Providers

Once a security provider is selected, the contracting process offers additional opportunity to embed requirements to abide by certain policies and standards designed to protect women and other disadvantaged groups from security and human rights risks, as well as to clearly define appropriate monitoring and accountability mechanisms. For example, companies should ensure that contracts include zero-tolerance clauses for sexual and gender-based violence, as well as discrimination based on gender, race, ethnicity, religion, Indigenous status, or sexual orientation. Companies may also include in

their requirements for private security contractors to have their own grievance mechanism within the company that includes the ability to handle reports of sexual exploitation, violence or abuse. Although a security provider may have a grievance mechanism in place, what is often lacking is the coordination between the mechanism of the security provider and that of the client (i.e., establishing in which cases should the security provider report grievances/incidents to the client so that the client is aware of potential violations and the two organizations can agree on a course of action to ensure the grievance is properly managed). The contracting process should include clear rules related to reporting grievances to mitigate potential risks.

Considerations for Gender-Sensitive Contracting and Private Security Companies

In their [Gender and Private Security Regulation](#) policy brief, DCAF, ODIHR and UN Women outline the rationale for including a gender perspective in regulations applied to private military and security companies (PMSCs). While the policy brief primarily targets regulators, it offers a number of suggestions on minimum expectations for the internal policies of PMSCs that are relevant and noteworthy for companies procuring the service of PMSCs. This includes key content for a Code of Conduct, such as explicit prohibition of sexual abuse and exploitation and gender-based violence as a criminal act and human rights violation, implementation of non-discriminatory working conditions for PMSCs, and safety and security of personnel working for PMSCs. The policy brief draws on information in the [Contract Guidance Tool](#) that includes both checklists on award and exclusion criteria, as well as a contract template.

Furthermore, it is crucial in these cases that additional consideration be made to ensure the private security providers engage in sensitization and training for their staff. Companies can encourage this by covering the costs of such sensitizations and training, either in part or in full – specially to avoid any cost cutting measures that

could jeopardize its effectiveness. Companies may also be able to mandate such training in the contract (e.g., many UN agencies require security personnel to undergo prevention of sexual exploitation and abuse training before being deployed, especially in contexts with high rates of sexual and gender-based violence).



Private Security Providers

Sample Code of Conduct Provisions for Private Security Providers:

The State Department's Office to Monitor and Combat Trafficking in Persons, Verité, Made in a Free World, and the Aspen Institute created an online tool for companies in various sectors to integrate measures for combatting trafficking in persons throughout their supply chains, including in the private security sector. [Tool 01 of the Responsible Sourcing Tool](#) offers a number of sample clauses for the Codes of Conduct of private security providers which can help to embed stronger protective measures for local communities, including women and other disadvantaged groups specifically, including clauses on human trafficking, workplace equality, humane treatment, and freedom of association.

TIP

Grievance Mechanisms for Private Security Providers

Where private security companies do not have their own grievance mechanism in place, companies can encourage them to use a set of resources developed by the ICoCA. *Developing and operating fair and accessible company grievance mechanisms that offer effective remedies* includes both a [manual](#) and [interpretive guidance](#) to help private security companies develop the policy and implementation framework for grievance mechanisms.

Encouraging Diversity and Representation within Private Security Providers

As much as possible, companies should encourage representative, diverse and inclusive hiring practices for private security providers. This can even be contractually required with private security providers, where appropriate (i.e., it is not uncommon to find in contracts requirements to employ a certain percentage of women or members of a local community). This can ensure that population groups that are normally disadvantaged have access to employment opportunities. There are many benefits to having a diverse and representative workforce amongst security providers, especially as it can help ensure that gender and culturally sensitive practices can be performed by the providers, as already outlined in Step 3.3.

Step 4.3 Deploy and Monitor Selected Private Security Provider

Onboarding and Communication

Companies should develop an onboarding process for private security providers that includes clear communication of company policies and procedures, including those that are specific to their engagement with women and other disadvantaged groups. Companies should not assume that private security providers have been made to understand relevant policies or procedures by the company deploying them. As such, companies need to develop their own processes internally to ensure adequate understanding and onboarding of security providers at their site. This should include cultural sensitivity training, as well as gender equality training.

In contexts with low literacy rates or multiple languages, consider the use of gender and culturally sensitive signage that is simple and visually reinforces policies. For example, signage should depict both women and men, as well as individual's representative of cultural and ethnic backgrounds in the community. Signage should also avoid reinforcing any negative stereotypes, taboos or beliefs, such as avoiding imagery that:

- Portrays women and girls in an overly sexualized manner;
- Portrays men as being dominant over women (e.g., men as strong, women as meek);
- Portrays individuals in a demeaning manner (e.g., photos of survivors of sexual abuse);
- Portrays individuals in line with harmful stereotypes (e.g., Indigenous people drinking alcohol); or
- Reinforces entrenched gender roles (e.g., only portraying women as caregivers to children and babies, only portraying men working in mining, etc.).

Training for Private Security Providers

Companies should play an active role in ensuring that training provided to security providers is inclusive of the rights of women and other disadvantaged groups, as well as on the specific risks and impacts that they face, such as sexual and gender-based violence. Training should be culturally relevant and gender sensitive, and account for prevailing norms, roles and values while also not serving to reinforce those that may be harmful to women and other disadvantaged groups. Furthermore, in contexts where specific risks have been identified, training should reflect and address these risks in a more in-depth manner. For example, in contexts where human rights defenders or labour rights activists are often targeted for their advocacy work, this should be given additional attention within the training course design and execution. Additional consideration should be made for security providers who are coming from outside of their own cultural contexts, and may require additional cultural sensitivity training.

Companies can access publicly available resources that may support the development of training sessions for public security providers. Where companies are resource constrained, they may look to combine resources via their membership in various industry associations or multistakeholder groups to invest in training resources and materials. For example, the ICoCA offers a free online [PSEA training course](#) for its membership, which is an effective way of providing resources to a large number of companies.



Private Security Providers

SCENARIO 3: MANAGEMENT PRACTICES FOR FIREARMS

The management procedures and practices that a company has in place can be critical to preventing human rights abuses in neighbouring

communities. Scenario 3 provides an illustrative example of how different approaches can result in different outcomes.

Company A

A company's private security forces in the Middle East are provided AK47 assault rifles. It is common practice at this company for security forces to bring their weapons home with them at the end of their day. One day, the company hears that one of their guards used the company provided weapon to physically assault and harm his wife.

Company B

A company's private security forces in the Middle East are provided AK47 assault rifles. The security force was trained on the storage and management of their weapons, including that these should be safely secured before they head home for the evening. This is a widely practiced and implemented procedure within the company. As a result, the company has not recorded any incidents of weapons used to perpetrate violence, especially gender-based violence.

Although not specific to gender, the ICoCA, in collaboration with Small Arms Survey, developed [weapons and ammunition management indicators](#) that outline procedures for marking, record keeping, securing, distribution and verification of weapons and ammunition in the possession of a company that may be useful.

Equipment and Facilities

Companies should work with private security providers to ensure that they have the proper policies and procedures in place to carefully control and monitor use of equipment used in the provision of security particularly with respect to any arms provided – in order to minimize potential adverse impacts on women and other disadvantaged groups. Some studies have demonstrated a link between the proliferation of arms amongst private security providers with the intensification of gender discrimination and violence against women.¹⁴ As such, strict protocols for armed private security guards should be agreed to and implemented by private security providers, and closely monitored by companies.

However, as demonstrated in Module 3, other equipment provided to private security providers can be used by public security providers in committing abuses against women and other disadvantaged groups. Uniforms, ID badges and vehicles can be a source of power in some communities, and provide opportunity for abuse if left unchecked. Companies should carefully assess these specific risks, and identify proper policies, use guidelines and control measures to mitigate these risks.

Furthermore, companies should assess any facilities used by private security providers to ensure that they provide a safe environment for women and individuals from other disadvantaged groups. As noted in Module 3, companies should ensure that there are separate bathrooms or changing rooms provided for women and men, and that these are properly maintained and have appropriate signage. Areas where security providers may be posted should have adequate lighting, especially where guards may be posted overnight.

¹⁴ Mazali, Rela. (2009). The Gun on the Kitchen Table: The Sexist Subtext of Private Policing in Israel; Mathews, S., Abrahams, N., Jewkes, R., Martin, L. J., Lombard, C., & Vetten, L. (2008). Intimate femicide-suicide in South Africa: a cross-sectional study. *Bulletin of the World Health Organization*, 86(7), 552–558. <https://doi.org/10.2471/blt.07.043786>

SCENARIO 4: USE OF SECURITY MONITORING EQUIPMENT

Scenario 4 provides an illustrative example on the use of security monitoring equipment by a private security provider and possible mitigation measures to prevent negative community reaction.

A private security company uses a set of drones to help them monitor a mine site perimeter given that the mine is on a very large concession, and the use of drones is more cost effective. In deploying the drones, they are often flown over areas where community members live – including in areas where members of an Indigenous group that have voiced opposition to the mine are living. The drones are a significant source of stress for the Indigenous group – and especially those members who had been most vocal, as they perceive this to be an invasion of privacy and an attempt to intimidate. They also had to reassure the elders that the drones were not evil spirits sent by the company.

Mitigation Measures:

- Companies should ensure clear equipment management plans and approval processes are in place to ensure that they evaluate the use of different types of equipment and how they are to be used.
- Preliminary engagement with local communities – and especially women and other disadvantaged groups – to present new technologies and solicit input on their use is encouraged. This can allow for both the opportunity for individuals to voice opposition to certain types of equipment or concerns, as well as to simply raise awareness about the use of such equipment and avoid misunderstandings.
- If the community agrees, it is possible to do a live demonstration of a drone and its capabilities, including by flying over a place of mutual agreement and subsequent demonstration of the footage.
- Identify other alternatives to technologies or equipment that are simply not suitable for an environment where there is significant mistrust. For example, propose to hire members of the Indigenous group to monitor the concession area adjacent to their homes.



Private Security Providers

Step 4.4 Respond to Private Security Provider Misconduct

Companies can refer back to Step 3.5, and particularly Tool 3.5A, to inform the creation of an appropriate response plan to alleged incidents of misconduct on the part of private security providers. Additional considerations for companies to consider where alleged incidents involve women or other disadvantaged are provided below (note that this table is compatible with Tool 4.4 in the IGT).

Tool 4.4A

Action Planning

Task	Specific Action Items	Desired Output or Outcome
1. Record all allegations	<ul style="list-style-type: none"> Individuals responsible for receiving and processing allegations of misconduct should have specific training to ensure they are capable of handling sensitive incidents and engaging with individuals who may have experienced trauma (including sexual violence). This training should be extended to staff who may not be responsible for operating specific complaints mechanisms (e.g., community-level grievance mechanisms), but who are engaged in roles where these may be disclosed to them (e.g., community liaison persons, etc.). Training for individuals receiving and processing allegations of misconduct should also address any harmful stereotypes or misconceptions around sexual violence (e.g., victim blaming). This includes biases towards the credibility of survivors based on their gender, sexual orientation, ethnicity, profession (e.g., sex workers), etc. Staff should be made aware of the additional importance in respecting confidentiality where abuse is alleged by women and other individuals from disadvantaged groups (e.g., stigmatization, rejection from their family, etc.), and repercussions for intentional breaches in confidentiality should be clearly stated. Allegations should be reported using forms that collect all necessary information about the alleged incident that could be used for future investigations or lessons learned. Annex B provides a template that companies may find useful. 	<ul style="list-style-type: none"> Women and individuals from other disadvantaged groups are less likely to be re-traumatized, and are more likely to have their complaints taken seriously.
2. Conduct investigation into credible allegations	<ul style="list-style-type: none"> Companies should have a policy to investigate all allegations of a serious nature, such as sexual violence. Companies should ensure that those involved in investigating misconduct have the right skills and expertise to engage with potentially vulnerable survivors, especially where they have experienced significant trauma. For example, investigating sexual violence requires particular experience and sensitivity. Another example includes investigations involving young girls and boys. Investigators should have a strong understanding of the local cultural context. Investigative resources should adapt to the needs of women and disadvantaged groups – such as accessible language support, psychosocial support for participating in investigations, etc. 	<ul style="list-style-type: none"> All serious allegations are investigated. Investigations do not re-traumatize survivors.

Task	Specific Action Items	Desired Output or Outcome
3. Determine mode and extent of disclosure	<ul style="list-style-type: none"> Procedures for escalating investigation findings internally should consider the specific risks to women and disadvantaged groups – companies should take a survivor-centered approach in managing complaints/incidents and disclosure on a ‘need to know’ basis only. Incidents should not be reported to law enforcement authorities without the consent of survivors. Where incidents have been reported and involve complainants who are women and/or from another disadvantaged group, companies may need to apply additional pressure for investigation and resolution, as these are not always given the same level of attention. 	<ul style="list-style-type: none"> Disclosure and escalation practices do not bring risk to woman and individuals from other disadvantaged groups.
4. Pursue appropriate disciplinary or remedial actions	<ul style="list-style-type: none"> Disciplinary or remedial actions taken should be communicated with survivors of misconduct, and where appropriate, with local community groups (ensuring inclusion of women and other disadvantaged groups), to avoid the perception of impunity and ongoing risks. Where companies terminate a business relationship or a particular individual, this should be properly documented and communicated with relevant staff to ensure that the reasons for termination are known. This can help to ensure that such businesses or individuals do not inadvertently receive a reference or referral by staff who were not directly involved in the investigation or termination.¹⁵ Where a company suspends a business relationship, a misconduct assessment (particularly in the case of sexual violence and abuse) that demonstrates commitment and capacity building for implementing prevention of sexual exploitation and abuse provisions should be a condition for removal of the suspension. 	<ul style="list-style-type: none"> Clear communication of disciplinary or remedial actions taken with survivors and local community. Resolution of misconduct case.
5. Conduct lessons learned exercise	<ul style="list-style-type: none"> Lessons learned should specifically account for how gender or other identity factors have impacted a particular incident and result of the investigation. Changes to contracts, procedures or policies should incorporate specific recognition of women and other disadvantaged groups, where they do not already. 	<ul style="list-style-type: none"> Lessons learned and communicated.

¹⁵ Note: Privacy laws and the need to also ensure the safety of perpetrators may forbid the sharing of this information so companies should check before sharing information.



Private Security Providers

Step 4.5 Address Private Security Provider Challenges

The final tool in Module 4 of the IGT provides some examples of typical challenges that companies may encounter while working with private security providers, along with some potential options for addressing these. Below, we offer additional examples of challenges that companies may face that are specific to the risks and impacts on women and other disadvantaged groups.

Types of challenge	Your company could consider...
Private security providers in the area/ country do not have a Code of Conduct or policy framework that includes provisions or prevention of sexual exploitation and abuse, non-discrimination, anti-harassment, etc.	<ul style="list-style-type: none">• Companies may opt to embed their own Code of Conduct or policy framework into their contractual agreement with the private security provider.• Signature of the Code of Conduct and relevant policies by security providers to acknowledge receipt, review and acceptance to abide by them.• On-site review sessions prior to commencing security service/duty.• Companies should keep records of who has signed and acknowledged, as well as received training on the Code of Conduct and other relevant policies.
Local communities are concerned about the presence of outside security providers in their communities, and especially the potential harassment of young girls and women – however, there are no local private security providers that meet the standards or expectations of the company.	<ul style="list-style-type: none">• If possible, ensure that discussions with the community are held BEFORE deploying security providers from outside the community/country in order to identify jointly agreed upon solutions to alleviating concerns.• Identify opportunities for building capacity and transition to local security staff with the private security company and local community (i.e., What training can be made available? Are mixed units of local and external guards feasible?).• Work with local women’s associations, groups or networks to create a community monitoring network to identify and address any instances that occur.

CASE STUDY 5

Strengthening Security Through a Local Partnership

The following case study illustrates an innovative approach to strengthening local security around an extractives project.

A VPI Member company (Company A) was operating in a country in Sub-Saharan Africa where all the communities that surrounded the company's operations were involved in cattle farming and had illegal arms at their disposal. The company found itself facing increasing risks on the ground with the discovery of oil and estimated reserves and high expectations of local communities for benefits and jobs, as well as with incidents involving warring communities within the area of the company's operations. The conflicts included blockades of operations and the storming of the company camps, especially during the dry season when communities were in greater need. The company came up with an innovative idea to build a local security company and employ community members, with the hopes of turning the risks they had been facing into an opportunity.

Company A helped create a joint venture between an international security company, with whom they had worked before, and a locally based security firm. The agreement involved revenue sharing and included certain obligations on both parties to supply support, capacity building, and establish all the basics for the local security firm to be successful. With this approach, the incidences of security breaches and local community issues were reduced greatly. This is attributable to having a local security force that was representative of the local community and strongly in tune with the local culture and dynamic.

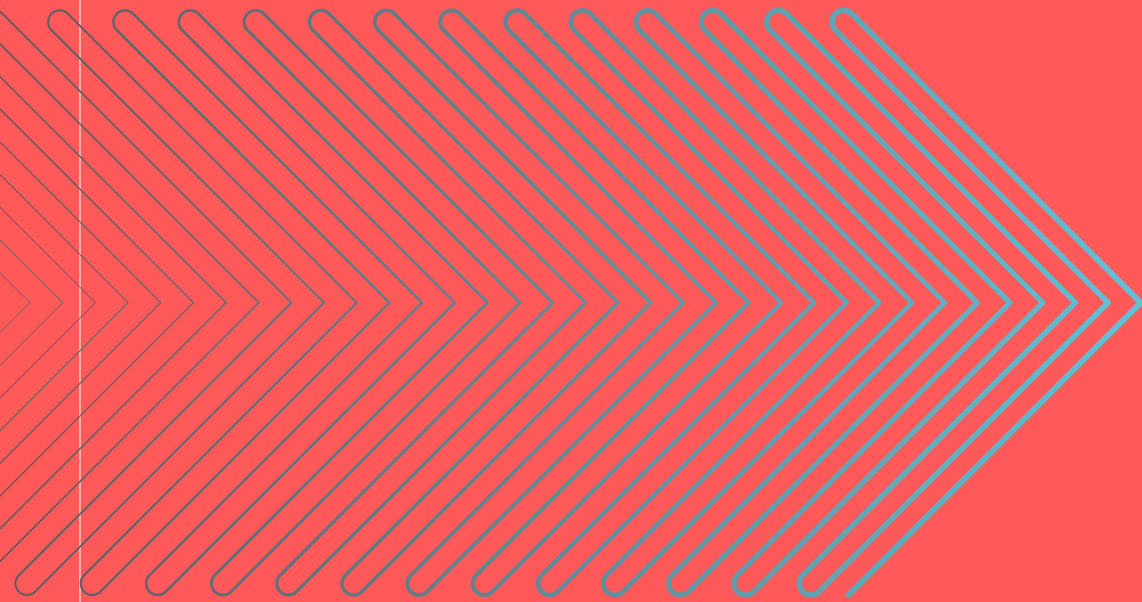
Company A also got very good at communications, including having communication centres in satellite towns and working with community Elders to disseminate what was happening across its different operation sites. One of the challenges in this approach is that it is expensive for a small, local company to adopt the standards (e.g., Voluntary Principles on Security and Human Rights and the International Code of Conduct for Private Security Providers) that demonstrate its quality of service. Company A had to be willing to support that effort. Part of the incentive/benefit is that Company A would need increased security services as it grows, so helping establish a local security company gave them a better line of sight on community issues and enhanced their risk mitigation. Through the joint venture, the international security company received a financial benefit by sharing profit as part of the agreement, while the local security firm also received a financial benefit and, at the end of the process, could offer services to other companies with its enhanced knowledge and professionalism.





Module Five

Grievance Mechanisms



While the IGT encourages companies to establish or use an existing grievance mechanism for reporting security and human rights-related incidents, it does not provide significant guidance on how grievance mechanisms should be established or managed. However, given the important role that grievance mechanisms play in how companies respond to security and human rights related incidents, as well as the tendency for women and other disadvantaged groups to face particular barriers in accessing them – it merits a closer look within the context of the implementation of the VPs.

This module provides guidance that can support companies implementing the VPs to reflect on the accessibility of grievance mechanisms to women and other disadvantaged groups who have experienced harm related to security and human rights. It is recognized that the scope of grievance mechanisms can expand beyond that of security and human rights, and that companies can benefit from additional guidance on establishing grievance mechanisms. As such, a number of additional resources have been included in Annex A which provide more in-depth guidance on how to design and implement a site-level grievance mechanism.

Objectives of Module 5

The Grievance Mechanisms Module helps companies:

- Identify potential barriers for women and other disadvantaged groups in accessing grievance mechanisms;
- Reduce barriers and improve access to grievance mechanisms for women and other disadvantaged groups; and
- Respond to grievances received from or about women and other disadvantaged groups.

This Module is composed of the following steps:

- Step 5.1: Analyze the accessibility of grievance mechanisms for women and disadvantaged groups
- Step 5.2: Identify corresponding measures to increase the accessibility and remove potential barriers

Before You Get Started

As with stakeholder engagement processes, companies should involve rightsholders and stakeholders when designing community-level grievance mechanisms – ensuring meaningful engagement with women and other disadvantaged groups. This not only ensures that the mechanisms are ‘fit-for-purpose’, but also that there is greater buy-in for their use by rightsholders and stakeholders that may face additional barriers in accessing them. Companies should employ the same strategies noted in Module 1 to identify inclusive approaches within these design processes – including specific analysis of the potential barriers that may face women and other disadvantaged groups, as well as on how these can be overcome.

This same principle applies to internal mechanisms designed to address security and human rights-related grievances or complaints filed by employees of the company or its contractors. Women and individuals from other disadvantaged groups should be consulted in the design of internal complaints mechanisms.



Grievance Mechanisms

Step 5.1 Analyze the Accessibility of Grievance Mechanisms for Women and Disadvantaged Groups

There are a number of reasons why women and other disadvantaged groups may be less likely to use a community-level grievance mechanism for security and human rights-related incidents. These include:

- A fear of not being believed, being revictimized or being stigmatized.
- A fear of facing their perpetrator, either in a planned (e.g., through a judicial process) or unplanned (e.g., running into them in the community, especially where they know each other) situation.
- A lack of confidence in grievance mechanisms for handling gender-related complaints.
- Inadequate policy or legal frameworks that do not recognize certain types of grievances or limits them by definition (e.g., policies or laws that narrowly define rape or other forms of sexual violence).
- A lack of confidence in external mechanisms such as policing, the judicial system, etc.
- A culture of impunity or feelings by the survivor that a complaint will not result in any action or remedy.
- In cases of sexual violence, individuals may fear reprisals based on repressive laws targeting the LGBTQI+ community that prohibit same sex relations.
- A fear of female survivors having to report to male police personnel.
- A corporate culture or working environment that de-values efforts to identify and expose wrongdoing (e.g., brushing incidents under the rug, 'don't tell' culture, etc.).

As a result of these barriers, there is often significant underreporting of instances of sexual and homophobic discrimination, harassment, bullying and abuse by women and other disadvantaged groups. Companies should closely examine these barriers through an intersectional lens to develop an understanding of how these barriers influence the likelihood for particular individuals to use a community-level grievance mechanism. Tool 5.1A provides a set of questions that can help companies to reflect on potential barriers.

Tool 5.1A

Evaluating the Accessibility of Grievance Mechanisms

Potential Barriers	Women	People with a disability	Indigenous women
Location: <ul style="list-style-type: none"> • Is the location to file a grievance far from where women live and work? • Would transportation be required? Is the cost prohibitive? • Is the location a safe space (i.e., do potential complainants need to engage with potential perpetrators of abuses in order to access the mechanism and file a grievance)? • Does the location ensure confidentiality? 			

Tool 5.1A (continued)

Potential Barriers	Women	People with a disability	Indigenous women
<p>Technology:</p> <ul style="list-style-type: none"> • Is the technology or process used for the grievance mechanism available on a device that is widely available? • Has technical support been considered to facilitate its use, including access to an electronic device? • Are there particular costs to engaging with this grievance mechanism technology or process that could be a barrier (e.g., buying airtime, cost of sending SMS message, paying to access internet for a laptop, time at an internet café, etc.)? • Has another option been considered in locations with little or no internet connection, if the technology or process is web-based? 			
<p>Literacy and Language:</p> <ul style="list-style-type: none"> • Are the various methods for submitting a grievance available in a language accessible to this group? • Has the grievance form been pre-validated to ensure access for people with limited literacy? • Can someone who has physical impairment (e.g., hearing loss, vision loss, etc.) use the grievance mechanism? 			
<p>Hours:</p> <ul style="list-style-type: none"> • Is the grievance mechanism available at times of the day that are conducive (i.e., outside of working hours) for women and other disadvantaged groups? • Is the grievance mechanism available on weekends as well as weekdays? • Is there a time limit to file a grievance? 			
<p>Legitimacy/Trust:</p> <ul style="list-style-type: none"> • Are there factors that could affect the trust of company grievance mechanisms? <ul style="list-style-type: none"> ◦ E.g., lack of addressing past grievances, application of an unreasonably short limitation period for filing a grievance, perception of the company working with public or private security providers involved in an incident – impacting its neutrality or support of the survivor. 			
<p>Security Culture:</p> <ul style="list-style-type: none"> • Is there a culture of ‘don’t tell’ amongst public or private security providers, or other company staff? 			
<p>Stigmatization/Fear of Reprisal:</p> <ul style="list-style-type: none"> • Do women or other disadvantaged groups face potential reprisal at home/at work/ in the community if their grievance was made public? Use Tool 5.1B below in order to better understand the potential implications of stigmatization for various individuals based on their gender, race, ethnicity, religion, age, etc., depending on the type of abuse that occurs. 			



Grievance Mechanisms

Tool 5.1B

Identifying and Understanding Risk and Stigmatization for Survivors of Sexual Violence

Type of Risk or Impact

(in this example for women who experience sexual violence)¹⁶

Result of Risk/Stigmatization

Likelihood

Mitigation Measures/Response

Economic

- Loss of income
- Expenses for medical care (both immediate and long-term)
- Inability to return to the workplace where the incident occurred for fear of intimidation or being revictimized
- Loss of inheritance

Social/Relational

- Rejection by husband/family/community
- Loss of custodial rights of children
- Loss of social standing

Psychological/Emotional

- Loss of self-esteem
- Feeling of guilt, of not being believed
- Post traumatic stress disorder/anxiety disorder/depression
- Loss of autonomy
- Inability to engage in sexual relations
- Sleep disruption (nightmares, insomnia, abnormal sleep patterns, etc.)
- Emotional stupor

Physical

- Injuries/physical trauma
- Unwanted pregnancy
- Transmission of sexually transmitted disease(s)
- Loss of fertility
- Chronic pain
- Domestic violence (resulting in injury or death)

Companies should evaluate the likelihood of negative impacts associated with sexual violence occurring, and create a mitigation and response plan accordingly. Note that women's experiences of sexual violence are multifaceted and may be related to their position in society, age, education, civil status, race, religion, etc. As such, it is imperative that companies understand the risks and stigma to survivors of sexual violence through an intersectional lens.

Companies should identify specific mitigation measures to address these risks and impacts, ranging from:

- Confidentiality and privacy policies for handling sexual violence complaints;
- Zero tolerance policies/dismissal of perpetrators;
- Compensation/economic support plans during periods of recovery;
- Preventive trainings and sensitization on women's rights, gender equality, etc.;
- Support for capacity building for psychosocial support in communities where little or no services exist;
- Ensure access to pregnancy tests; and
- Plan for supporting emergency medical costs for survivors (e.g., pregnancy tests, tests for sexually transmitted diseases, etc.).

¹⁶ This exercise can be repeated for other disadvantaged groups identified during the general risk assessment.

Step 5.2 Increase Accessibility and Remove Potential Barriers to Grievance Mechanisms for Women and Other Disadvantaged Groups

There are a number of measures that companies can implement to increase the accessibility of community-level grievance mechanisms, as well as – and most importantly – the trust of women and other disadvantaged groups to use them. As noted at the beginning of this module, engaging women and individuals and other disadvantaged groups in the design of grievance mechanisms, such as through participatory design approaches, is a crucial step towards generating trust and buy-in for a community-level grievance mechanism.

Integrating Local Structures and Mechanisms

In some contexts, women and other disadvantaged groups may have greater trust in local or customary structures for addressing certain types of grievances. For example, there may be well functioning local mechanisms for dealing with grievances between community members and members of the local police (e.g., harassment of individuals by local police officers looking to illegally tax individuals along a route used to access an extractive site). Where women and other disadvantaged groups express preference for these mechanisms, companies should identify ways of working in tandem with these structures for addressing certain grievances.

While in certain circumstances this may be a viable and effective option, in others, local mechanisms may be exclusionary and lack the trust of certain groups. They may also be ill-adapted or equipped for addressing certain types of grievances – particularly those that are most egregious, such as incidents involving rape. Therefore, companies will need to explore this option on a case-by-case basis, depending on the context in which they are working.

Transparency of Process

The process for submitting a grievance should be made clear and transparent for women and other disadvantaged groups. This requires companies to think through how this information is best conveyed to women and other disadvantaged groups. The tools in Module 1 may be useful in thinking through the best ways to engage women and other disadvantaged groups specifically on grievance mechanisms. Given that grievance mechanisms often pertain to very sensitive issues – such as rape – companies should identify how these can be discussed in a manner that does not pose a risk to women. For example, in some contexts, attempting to discuss the subject

of rape with a woman in front of her husband could unintentionally create tension or even harm for that woman. The process of confidentiality and anonymity is also of utmost importance for many survivors seeking redress through a grievance mechanism, and should be adequately explained and adhered to.

Awareness-Raising and Communication

Companies need to think about how they will specifically reach out to women and other disadvantaged groups for disseminating information about their community-level grievance mechanism. Companies can use the findings from Tool 1.3 to identify the particular communication needs and barriers for women and other disadvantaged groups to ensure that they are communicating in a way that is accessible and easily understood.

Collaboration with Service Organizations

Companies should collaborate with local organizations, both governmental and non-governmental, in ensuring that there is wide access to information and a clear understanding of grievance mechanisms amongst women and other disadvantaged groups. These organizations and services can play a key role in not only sharing information and supporting greater understanding of the grievance mechanism, but can also help to build trust in its use and encourage survivors to come forward. For example, local clinics, health units or youth organizations that service particular populations that have experienced trauma or sexual violence may be willing to provide information to potential survivors to ensure that they are aware of and understand this option for reporting abuse. Scenario 5 provides an illustrative example as to how.



Grievance Mechanisms

SCENARIO 5: GENDER-SENSITIVE AWARENESS RAISING OF COMMUNITY-LEVEL GRIEVANCE MECHANISMS

Company A

A company organizes a public session to explain its site-level grievance mechanism to local community members, including both women and men. During the session, the issue of sexual violence is discussed as a type of incident that the site-level grievance mechanism is meant to address. This is not an issue that is frequently discussed in the local community, and survivors of sexual violence are often blamed and even shunned by the community. The women in the room feel uncomfortable discussing this issue in front of their husbands and with people that they do not know. They also grow concerned that if they are seen near the company's offices, that they will be the subject of rumors as to why they were there.

Company B

A company is operating in an area where there is significant stigmatization around sexual violence. In order to ensure women in the area understand the company's commitment to receiving and investigating allegations of sexual violence, the company establishes a collaborative and transparent relationship with women in the community who are leaders in the local women's association. Over time, they build up trust and understanding of the grievance mechanism and its process, and that using it is a free service of assistance. The women's association leaders agree that during one of its next meetings, it will share the information with their members to inform them about the grievance mechanism. The meeting is for members only and is held in a trusted environment. The women feel more comfortable to ask questions, and appreciate that they are able to discuss this in a manner where they will not face tension with their husband or other men. The company covers the costs of the meeting.

Training for Staff

The staff members responsible for operating a community-level grievance mechanism should have the proper training for handling sensitive grievances – particularly those related to sexual violence. This includes things like how to speak with survivors in a manner that does not convey blame or revictimizes individuals, or the importance of anonymity and confidentiality. In addition, gender-bias and diversity training can also help these staff avoid potential inherent biases that could lead to negative experiences for those bringing forward a grievance, and lead to a reduction in trust or use of the mechanism.

Diversity of Staff

Staff members responsible for operating a community-level grievance mechanisms should be representative of the local population, and should include both women and men. This is especially important for survivors of sexual violence, often whom are women and girls, as they are more likely to feel comfortable confiding in a woman than in a man.

Support for Survivors

The support offered to survivors of security and human rights incidents should be provided by trusted individuals and organizations. Companies should identify community organizations, associations or networks that are capable of supporting women and other disadvantaged groups throughout the process of submitting a grievance mechanism. Company support to these organizations could include things like financial support for trainings or logistical costs (e.g., supporting survivors to seek medical attention).

Safety of Survivors and Witnesses

Companies should support survivors of abuse, as well as potential witnesses, to ensure their safety, including from fear of reprisal by alleged perpetrators. This includes maintaining anonymity and confidentiality, where requested, as well as covering costs related to security measures, such as temporary relocation.



Centring the Survivor's Experience

- “The person who has been abused has the right to feel safe and dignified during treatment and care. They are also entitled to privacy, confidentiality, and access to justice.”
- “Support and assistance mechanisms should be built according to different people's needs as they differ based on age, background, gender, special needs, and different abilities.”
- “Care that is provided to the abused should honour the principle of “do no harm,” and ensure privacy, safety, and non-discrimination.”
- “The abused should be given space for self-determination.”
- “Abused persons and complainants should have the right to obtain information related to the services that will be provided to them and the procedures that will be followed.”
- “It is the right of those who have been abused to determine what kind of help they need.”

Organizational Safeguarding Best Practices and Procedures: A Toolkit Towards Transnational Intersectional Feminist Accountability Frameworks to Respond to Exploitation, Assault, Abuse, Harassment and Bullying (<https://www.wilpf.org/wp-content/uploads/2021/08/Syria-Safeguarding-Toolkit-Toolkit-English-final-WEB.pdf>)



Glossary, Acronyms and Annexes

Glossary

Disadvantaged Groups

“Groups of persons that experience a higher risk of poverty, social exclusion, discrimination and violence than the general population, including, but not limited to, ethnic minorities, migrants, people with disabilities, isolated elderly people and children” – European Institute for Gender Equality, (<https://eige.europa.eu/thesaurus/terms/1083#:~:text=Groups%20of%20persons%20that%20experience,isolated%20elderly%20people%20and%20children>)

Conflict-Related Sexual Violence

“The term “conflict-related sexual violence” (CRSV) refers to rape, sexual slavery, forced prostitution, forced pregnancy, forced abortion, enforced sterilization, forced marriage, trafficking in persons when committed in situations of conflict for the purpose of sexual violence/exploitation and any other form of sexual violence of comparable gravity perpetrated against women, men, girls or boys that is directly or indirectly linked to a conflict.” – UN, (<https://www.un.org/sexualviolenceinconflict/our-work/our-mandate/>)

GBA+

Gender-based Analysis Plus (GBA+) is an analytical process used to assess how diverse groups of women, men and non-binary people may experience policies, programs and initiatives. The “plus” in GBA+ acknowledges that GBA goes beyond biological (sex) and socio-cultural (gender) differences. We all have multiple identity factors that intersect to make us who we are; GBA+ also considers many other identity factors, like race, ethnicity, religion, age, and mental or physical disability. – Women and Gender Equality Canada – WAGE.

Gender

Gender refers to socially-constructed ideas, norms, and rules that define the behavior, experiences and relationships between women, men, girls and boys – including their access to resources and power. These social constructs evolve over time and are context-specific, and include individuals whose gender identity is outside the scope of the more traditional gender of male or female (e.g., non-binary). It is important to note that the gender of an individual is not automatically linked to the sex provided at birth (e.g., individuals who are transgendered).

Gender blind/neutral

Gender blind/neutral refers to a context in which a policy, project, event, practice or procedure ignores gender norms, roles, and relations and may reinforce gender-based discrimination, biases, and stereotypes.

LGBTQI+

LGBTQI+ stands for lesbian, gay, bisexual, transgender, queer and intersexed, plus. Various acronyms are used to refer to people who are attracted to people of the same gender, people with gender identities that differ from the sex assigned to them at birth, people with nonbinary identities and people whose sex characteristics do not fit typical definitions of female or male. While this acronym has universal recognition, different people in different contexts identify with other terms including hijra, meti, lala, skesana, motsoalle, mithli, kuchu, kawein, travesty, muxé, fa’afafine, fakaleiti, hamjensgara and Two-Spirit.” – OHCHR, (<https://www.ohchr.org/en/issues/lgbti/Pages/index.aspx>)

Marginalized Groups

“Different groups of people within a given culture, context and history at risk of being subjected to multiple discrimination due to the interplay of different personal characteristics or grounds, such as sex, gender, age, ethnicity, religion or belief, health status, disability, sexual orientation, gender identity, education or income, or living in various geographic localities.” – European Institute for Gender Equality (EIGE) (<https://eige.europa.eu/thesaurus/terms/1280>)

Sexual Violence

“Sexual violence is any sexual act, attempt to obtain a sexual act, or other act directed against a person’s sexuality using coercion, by any person regardless of their relationship to the survivor, in any setting.” – World Health Organization, (<https://apps.who.int/violence-info/sexual-violence/>)

Vulnerable Groups

“Women, children and persons belonging, or perceived to belong, to groups that are in a disadvantaged position or marginalised” – European Institute for Gender Equality (EIGE)



Acronyms

DCAF	Geneva Centre for Security Sector Governance
DDR	Disarmament, Demobilization and Reintegration
GBA+	Gender-Based Analysis Plus
GBV	Gender-based Violence
ICMM	International Council on Mining and Metals
ICoCA	International Code of Conduct Association
ICRC	International Committee of the Red Cross
IFC	International Finance Corporation
IGT	Implementation Guidance Tool
IPIECA	Global oil and gas association dedicated to advancing environmental and social performance
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer and Intersexed, Plus
NGO	Non-governmental Organization
ODIHR	Office for Democratic Institutions and Human Rights
PMSC	Private Military and Security Company
PSEA	Prevention of Sexual Exploitation and Abuse
SALW	Small Arms and Light Weapons
SEA	Sexual Abuse and Exploitation
SGBV	Sexual and Gender-Based Violence
UN	United Nations
UNDRIP	United Nations Declaration on the Rights of Indigenous People
VPSHR or VPs	Voluntary Principles on Security and Human Rights

Annexes

Annex A: Helpful Resources

The following list provides a wide range of resources that companies may find useful to support their efforts to adopt an approach to VPSHR implementation that is both gender sensitive and responsive to needs, risks and experiences of disadvantaged groups. This includes guides, training materials, policy briefs and resources that may help inform security risk assessments. Note that while some resources specifically target the extractives or security sectors, other resources target industries or audiences that may have related challenges (e.g., humanitarian sector).

Guidance on Integrating Gender into the Extractive Industries

- A Guide to Gender Impact Assessment for The Extractive Industries – Oxfam Australia: (https://www.oxfam.org.au/wp-content/uploads/2017/04/2017-PA-001-Gender-impact-assessments-in-mining-report_FA_WEB.pdf)
- Women in Mining and the Responsible Gold Mining Principles A guide to best practice – World Gold Council: (<https://www.gold.org/download/file/15836/women-in-mining-rgmps.pdf>)
- Gender Analysis, Assessment and Audit Manual & Toolkit – ACIDI/VOCA: (https://www.acdivoca.org/wp-content/uploads/2022/09/acdivoca_gender_analysis_manual_nov_2012.pdf)
- Toolkit: Gender Impact Assessments for Projects and Policies Related to Artisanal and Small-Scale Mining – Impact: (https://impacttransform.org/wp-content/uploads/2020/12/IMPACT-GIA-Toolkit_EN-2020_web.pdf)

Guidance on Gender and Security Provision

- DCAF Gender and Private Security Regulation: Policy Brief – DCAF: (https://www.dcaf.ch/sites/default/files/publications/documents/GSPolicyBrief_2%20EN%20FINAL_0.pdf)
- DCAF Gender Training for Security Sector Personnel – DCAF (<https://www.dcaf.ch/sites/default/files/publications/documents/Practice%2BNote%2B12.pdf>)

- Police Gender Toolkit: Standardized Best Practices on Gender Mainstreaming in Peacekeeping – UN: (https://police.un.org/sites/default/files/united_nations_police_gender_toolkit_handbook1.pdf)
- Guide On Gender Equality And Women, Peace And Security For Canadian Police Officers Deployed In Peacekeeping Operations – The WPS Group & RCMP: (https://78b726aa-0f8c-4b51-a45b-4dc5095d1c0f.filesusr.com/ugd/b7651e_d61fc70813b84cc5abeb75644fff249e.pdf)
- Private Military and Security Companies and Gender – UN & DCAF: (<https://trainingcentre.unwomen.org/instraw-library/2008-T-PEA-GLO-PRI-EN.pdf>)
- Gender Self-Assessment Guide for the Police, Armed Forces and Justice Sector – DCAF: (https://www.dcaf.ch/sites/default/files/publications/documents/self_assessment_guide.pdf)
- Women Peace and Security Index – Georgetown Institute for Women, Peace and Security (GIWPS): (<https://giwps.georgetown.edu/the-index/>)
- Women, Peace and Security Hub – Women's International League for Peace and Freedom (WILPF): (<https://www.peacewomen.org/resource-center>)
- National Action Plans (NAPs) for UNSC Resolution 1325 on Women, Peace and Security – WILPF: (<http://1325naps.peacewomen.org/>)
- Research Hub - Consortium on Gender, Security and Human Rights: (<https://genderandsecurity.org/reshub>)
- Gender & Conflict Analysis Toolkit for Peacebuilders – Conciliation Resources: (<https://reliefweb.int/sites/reliefweb.int/files/resources/CR%20Gender%20Toolkit.pdf>)
- Gender and Private Security Regulation – DCAF: (https://www.dcaf.ch/sites/default/files/publications/documents/GSPolicyBrief_2%20EN%20FINAL_0.pdf)

- Organizational Safeguarding Best Practices and Procedures: A Toolkit Towards Transnational Intersectional Feminist Accountability Frameworks to Respond to Exploitation, Assault, Abuse, Harassment and Bullying – CTDC & WILPF: (<https://www.wilpf.org/wp-content/uploads/2021/08/Syria-Safeguarding-Toolkit-Toolkit-English-final-WEB.pdf>)

Rights of Indigenous People

- Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples – Government of Canada: (<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-assessment-potential-impacts-rights-indigenous-peoples.html>)

Children's Rights and Security

- Child Rights and Security Handbook – UNICEF: (<https://www.unicef.ca/sites/default/files/2019-01/FINAL-CRS-Handbook-ENGLISH-February-2018.pdf>)
- Child Rights and Security Checklist – UNICEF: (<https://www.unicef.ca/sites/default/files/2019-01/Child-Rights-and-Security-Checklist.pdf>)

Persons with a Disability

- One Billion Forgotten: Protecting the Human Rights of Persons with Disabilities – Human Rights Watch: (https://www.hrw.org/sites/default/files/related_material/2014%20disabilities_program_low.pdf)

Human Rights Defenders

- Women Human Rights Defenders Confronting Extractive Industries – Association for Human Rights in Development: (<https://www.awid.org/sites/default/files/atoms/files/whrds-confronting-extractive-industries-report-eng.pdf>)
- Women Environmental Human Rights Defenders: Facing Gender-based Violence in Defense of Land, Natural Resources and Human Rights – IUCN: (https://portals.iucn.org/union/sites/union/files/doc/iucn-srjs-briefs-wehrd-gbv-en_0.pdf)
- Declaration on Human Rights Defenders – United Nations Human Rights Office of the High Commissioner: (<https://www.ohchr.org/en/special-procedures/>)

[sr-human-rights-defenders/declaration-human-rights-defenders#:~:text=The%20declaration%3A,fundamental%2Ofreedoms%20through%20peaceful%20means](https://www.ohchr.org/en/special-procedures/sr-human-rights-defenders/declaration-human-rights-defenders#:~:text=The%20declaration%3A,fundamental%2Ofreedoms%20through%20peaceful%20means))

- Strategies for the Prevention and Protection of Human Rights Leaders and Defenders in Colombia – CREER: (<https://www.creer-ihrb.org/cajadeherramientas>)
- Addressing Security and Human Rights Challenges in Complex Environments Toolkit – DCAF & ICRC: (https://securityhumanrightshub.org/sites/default/files/2019-10/ASHRC_Toolkit_V3.pdf)
- Conflict Prevention Tool – DCAF & ICRC: (https://securityhumanrightshub.org/sites/default/files/2021-07/Conflict%20Prevention%20Tool_Incubator%20Project_0.pdf)
- The Voluntary Principles of Security and Human Rights – The Voluntary Principles Initiative: (<https://www.voluntaryprinciples.org/wp-content/uploads/2019/12/TheVoluntaryPrinciples.pdf>)

Guidance on Private Security Operations

- Federal Act on Private Security Services Provided Abroad (PSSA) – Government of Switzerland FDFA: (<https://www.eda.admin.ch/eda/en/fdfa/foreign-policy/security-policy/bundesgesetz-ueber-die-im-ausland-erbrachten-privaten-sicherheit.html>)
- The Montreux Document on Private Military and Security Companies – Government of Switzerland & ICRC: (<https://www.icrc.org/en/publication/0996-montreux-document-private-military-and-security-companies>)
- Montreux Document Forum – DCAF: (<https://www.montreuxdocument.org/>)
- International Code of Conduct Association – ICoCA: (<https://icoca.ch/>)
- International Code of Conduct for Private Security Service Providers – ICoCA: (<https://icoca.ch/the-code/>)
- Guidelines for Private Security Providers on Preventing and Addressing Sexual Exploitation and Abuse – ICoCA: (https://icoca.ch/wp-content/uploads/2020/07/ICoCA_PSEA_Guidelines_A4_web_1.pdf)
- A Contract Guidance Tool for Private Military and Security Services – DCAF: (<https://securityhumanrightshub.org/sites/default/files/2020-04/contract-guidance-tool.pdf>)

- Protecting Against Trafficking in Persons: Sample Code of Conduct Provisions for Private Security – Responsible Sourcing Tool: (https://www.responsiblesourcingtool.org/uploads/78/RST-Security-Tool-01-Code_of_Conduct.pdf)
- Management of Weapons – ICoCA & Small Arms Survey: (<https://icoca.ch/wp-content/uploads/2022/03/Management-of-Weapons-Indicators.pdf>)

Tangguh Independent Advisory Panel

- Tangguh Independent Advisory Panel Reports – BP Indonesia: (https://www.bp.com/en_id/indonesia/home/news/reports.html)
- Security and Human Rights – BP Indonesia: (https://www.bp.com/en_id/indonesia/home/community.html#tab_security-human-rights)

Prevention of Sexual Exploitation and Abuse (PSEA) and Safeguarding

- DIGNA's Prevention of Sexual Exploitation and Abuse (PSEA) Organizational Assessment Tool – DIGNA: (<https://www.digna.ca/psea-organizational-assessment-tool/>)
- Organizational Safeguarding Best Practices and Procedures: A Toolkit Towards Transnational Intersectional Feminist Accountability Frameworks to Respond to Exploitation, Assault, Abuse, Harassment and Bullying – Women's International League for Peace and Freedom (<https://www.wilpf.org/wp-content/uploads/2021/08/Syria-Safeguarding-Toolkit-Toolkit-English-final-WEB.pdf>)
- Training of Trainers on Gender-based Violence: Focusing on Sexual Exploitation and Abuse – UNICEF: (<https://www.yumpu.com/en/document/read/5987383/unicef-training-of-trainers-on-gender-based-violence-focusing->)
- Frequently asked questions: Types of violence against women and girls – UN Women: (<https://www.unwomen.org/en/what-we-do/ending-violence-against-women/faqs/types-of-violence>)
- Preventing and Responding to Sexual and Domestic Violence against Men: A Guidance Note for Security Sector Institutions – DCAF: (https://www.dcaf.ch/sites/default/files/publications/documents/SDVAM_FINAL%20online.pdf)
- The Prevention of Sexual Exploitation and Abuse – ICoCA: (<https://icoca.ch/2021/04/12/online-training-now-available-the-prevention-of-sexual-exploitation-and-abuse/>)

LGBTQI+ Rights

- State-Sponsored Homophobia: Global Legislation Overview Update – ILGA World: (<https://ilga.org/state-sponsored-homophobia-report>)

Stakeholder Engagement

- Security and Human Rights Toolkit – DCAF, ICRC, GCBHR: (<https://securityhumanrightshub.org/toolkit>)
- Chapter 1.2 Community and Stakeholder Engagement – The Initiative for Responsible Mining Assurance (IRMA): (https://responsiblemining.net/wp-content/uploads/2018/08/Chapter_1.2_Stakeholder_Engagement.pdf)
- OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector – OECD: (https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-meaningful-stakeholder-engagement-in-the-extractive-sector_9789264252462-en;jsessionid=NKF3FP-ieB-1E-M9mPERrjsH.ip-10-240-5-99)
- In Search of Justice: Pathways to Remedy at the Porgera Gold Mine – BSR: (https://www.bsr.org/reports/BSR_In_Search_of_Justice_Porgera_Gold_Mine.pdf)

Grievance Mechanisms

- Effective Operational-level Grievance Mechanisms – International Commission of Jurists (ICJ): (<https://www.icj.org/wp-content/uploads/2019/11/Universal-Grievance-Mechanisms-Publications-Reports-Thematic-reports-2019-ENG.pdf>)
- Remediation and Grievance Mechanisms – Global Compact Network Netherlands, Oxfam and Shift: (<https://www.businessrespecthumanrights.org/en/page/349/remediation-and-grievance-mechanisms>)
- Towards Gender-responsive Implementation of Extractive Industries Projects – The Danish Institute for Human Rights: (https://www.humanrights.dk/sites/humanrights.dk/files/media/migrated/gender_and_extractives_report_sept2019.pdf)
- Developing and Operating Fair and Accessible Company Grievance Mechanisms That Offer Effective Remedies – ICoCA: (<https://icoca.ch/wp-content/uploads/2020/07/Manual.pdf>)



Annex B: Tool Templates

The questions in this Annex section in black are original questions from the IGT, everything in orange has been added.

Tool 1.1

Identifying Disadvantaged Groups

Ask yourself...	Reflections
Are there different ethnic groups that are present in the community/region?	
Have particular groups been identified as disadvantaged or as bearers of specific rights through national or international laws, domestic regulations, or government policies or plans?	
Are there particular groups within the country or project area that have been singled out or targeted by the government in a manner that is deemed to be restrictive of their rights?	
Are individuals within these groups organized, either formally or informally?	
Are there individuals involved in income-generating activities within the vicinity of the project that have been highly affected or are considered more vulnerable due to particular dangers or their level of informality?	
How do formal/informal leadership or decision-making structures work in this area? Are they exclusive of particular groups, either explicitly or in practice?	
Is there significant income inequality between groups of people living in the community? Are these easily visible along particular lines (e.g., ethnic, religious, gender, etc.)?	
Is there acceptance of fluid and evolving concepts of gender?	

Tool 1.2

Mapping Power Dynamics¹⁷

Component	Suggested issues for analysis	Representative Group
Governance and decision-making	<ul style="list-style-type: none"> Representation in formal decision-making structures (i.e., district, town, city, etc. defined in law) Representation in customary or traditional decision-making structures (whether or not they are formally recognized in law) Participation in informal/influential community organizational structures (e.g., committees, networks, etc.) 	
Economic relations within the project area, institutions and at home	<ul style="list-style-type: none"> Common income-generating activities Societal value attached to tasks performed by women and men (i.e., are tasks typically performed by women/men seen as more prestigious, important, necessary, etc.?) Work profiles of men and women (remuneration, categories of employment, value of work, etc.) Workloads for women and men Location of the activity/task/work Benefits of working in one location over another Representation in industry/sectoral bodies (e.g., associations, networks, etc.) 	
Personal and family relations (including gender-related rules and norms)	<ul style="list-style-type: none"> Access to and control of family and household-related resources, including income, land, information, time, places, and spaces Roles in the household (e.g., workload, finances, etc.) Relations between the couple, including tension and violence in the home Social lives and networks of women and men at the household level Management of and contribution to household money and expenses 	
Security	<ul style="list-style-type: none"> Who is involved in providing security to local populations? Who is involved in making decisions about security? Who is involved in conflict mitigation/prevention efforts? 	

¹⁷ Mapping power dynamics can be done primarily through consultation but other sources of data could include household surveys/opinion polls, benchmarking, World Bank development indicators, Organization for Economic Co-operation and Development (OECD) Gender Data Portal indicators, etc.



Annex B: Tool Templates

Tool 1.3

How do women and men share and receive security-related information at the operations site and in the community?¹⁸

Communication Method: Complete the exercise for each method of communication that is used by the company to inform communities regarding stakeholder engagement events/security issues.

Women

Men

*Consider how information is both shared and received

Radio

- Who tends to share information on the radio?
- When is information on projects and government programs shared?
- Is the information transmitted gender-sensitive?
- Who owns/controls the radio at home?
- Who usually owns and listens to the radio in the community?

Community Meetings

- Who tends to organize community meetings?
- Who tends to promote community meetings and reach out to community members?
- At what time of day are they usually held?
- How are women and men notified about them (same or differently)?
- Where are they usually located? How long does it take for most people to reach the meeting venue?
- Who tends to provide information during community meetings?
- Who usually attends? Who usually speaks? Who is (most) listened to?

Phone

- Who has access to a phone?
- Who tends to own and use the telephone?
- Do women and men have the capacity to read information sent through text message?

Posters

- In what language are posters usually written?
- Where are posters usually placed?
- Who usually has access to these places?
- Who mainly reads posters and why?
- Are the posters representative of women and men?

¹⁸ This tool is an adapted version of a tool published in IMPACT's Gender Impact Assessment Toolkit (https://impacttransform.org/wp-content/uploads/2020/12/IMPACT-GIA-Toolkit_EN-2020_web.pdf).

Tool 1.3 (continued)

<p>Communication Method: Complete the exercise for each method of communication that is used by the company to inform communities regarding stakeholder engagement events/security issues.</p>	<p>Women</p>	<p>Men</p>
<p>Online</p> <ul style="list-style-type: none"> • Who has access to a computer and internet? • Who has access to cell phone and data? • Who can afford data or internet costs? • Who is computer literate? • Who accesses information online? • Who has an email account? • Who has a social media account(s)? • Do women and men use social media to access information? 		
<p>Others For example, megaphone, community theatre, word-of-mouth, newspaper</p>		

*Consider how information is both shared and received

Tool 2.1

Self-Assessment Tool for Establishing Scope and Scale of the Risk Assessment¹⁹

<p>Ask yourself...</p>	<p>Is this a potential source of risk for your company?</p>
<p>Conflict Situation</p>	
<p>Is there a recent history of, or potential for, violent conflict in the country?</p>	
<p>Has current or previous conflict been linked to tensions between particular ethnic, religious or cultural groups? Have there been human rights violations and security incidents (both reported and unreported) – including the high prevalence of domestic violence and/or sexual and gender-based violence (SGBV) – targeted at particular groups?</p>	
<p>Is there the potential for a recurrence of such violence?</p>	
<p>Is the potential for international conflict a concern?</p>	
<p>Is drug trafficking, human trafficking, smuggling or other illicit activity a problem in the country?</p>	
<p>Are there high levels of criminal activity?</p>	

¹⁹ The questions in black are original questions from the IGT, everything in orange has been added.



Annex B: Tool Templates

Ask yourself...	Is this a potential source of risk for your company?
Is there any insurgency, armed separatist, guerrilla or paramilitary groups operating in the country?	
Are there unsettled territorial or political claims in the country from previous conflicts?	
Will the company be relying on public security providers?	
Have there been disarmament, demobilization and reintegration (DDR) efforts that have seen members of non-state armed groups integrated into public or private security forces? Have there been sexual and gender-based violence-prevention/anti-harassment and anti-discrimination measures put in place in relation to DDR efforts?	
Is there a high proliferation of firearms and other weapons?	
Is there potential for violence against disadvantaged groups (e.g., women, minorities, Indigenous peoples)?	
Are there harmful societal norms that discriminate against women and/or other disadvantaged groups that may fuel or exacerbate conflict at local, regional or national levels?	
Are there tensions between local communities and migrant populations?	
Is there tension between large-scale mining, oil or gas operators (or other) with particular sectors that could be deemed as vulnerable (e.g., artisanal mining, fisherfolk, etc.)	
Security Provisioning	
Has the competence of public security providers ever been called into question?	
Has the competence of private security providers ever been called into question?	
Are public security providers poorly resourced (i.e., shortage of equipment, fuel, vehicles, etc.)?	
Do security providers (public or private) include women/members of ethnic minorities/religious minorities/etc.?	
Do public security providers have a reputation or history for human rights abuses (e.g., arbitrary arrests, torture, etc.) and violations of humanitarian law?	
Do private security providers have a reputation or history of human rights violations?	
Are private security providers legally permitted and available in country?	
Is there an inadequate level of understanding of human rights and humanitarian law by security providers?	
Are public security providers not paid adequately and/or regularly?	

Is this a potential source of risk for your company?

Ask yourself...

Have security providers (public or private) been accused of rights violations against women or other disadvantaged groups (e.g., Indigenous people, ethnic/religious minorities, etc.), including but not limited to sexual and gender-based violence?

Have security providers (public or private) been sensitized on the rights of women and other disadvantaged groups?

Have security providers (public or private) been provided with gender and diversity training?

Do security providers (public or private) offer recourse or remedy in response to claims of discrimination or harassment from women or other disadvantaged groups? Are they accessible?

Governance

Is corruption a perceived problem in the country?

Is there a history of, or potential for, political instability?

Is there a history of/potential for the government to push for preferential hiring of individuals from a particular ethnic, religious or cultural group?

Are the rights of minority groups viewed as repressed or abused (e.g., ethnic minorities, religious minorities, cultural minorities [e.g., Indigenous status], sexual orientation, etc.), and if so, by whom?

Could the credibility of investigations into human rights abuse allegations in the country be questioned?

- Is there a lack of capacity by the host government to carry out effective investigations (including those related specifically to sexual violence)?
- Is there the potential for political interference in such investigations?
- Is there potential for investigations to be biased where a survivor is of a particular gender, race, ethnicity, religion, class, etc.?

Are there limitations on press/media or civil society freedoms?

Are democratic or political freedoms repressed?

- Are land rights, labour rights, environmental rights and/or human rights activists specifically targeted or persecuted?

Is the capacity of the government to govern effectively questioned?

Do survivors of human rights abuses (including women and other disadvantaged groups) have access to an effective judicial system?

Are there adequate and specific laws to protect women and other disadvantaged groups from violence and abuse (e.g., laws against rape, sex trafficking, child abuse, etc.)?

Are decision-making structures inclusive (applicable at local, state/provincial/territorial and national levels)? Are women and other disadvantaged groups supported to actively participate?



Annex B: Tool Templates

Ask yourself...

Is this a potential source of risk for your company?

Socio-Economics

- Is poverty prevalent?
- Are there particular groups that are more affected by poverty than others (e.g., women, people of a particular ethnic or religious group, Indigenous people, etc.)?
- Is disaggregated data available and does it support the latter statement that a particular group is disproportionately affected?

Is there a presence of conflict, armed or otherwise, over the use of land or natural resources (e.g., land access, water quantity or quality, etc.)?

- Is there a high disparity in income or wealth distribution?
- Is this disparity between particular or distinct groups?

Are there ethnic or religious tensions?

Are labour issues a concern in the country (e.g., industrial action, trade union activism, labour conflict, etc.)?

Is the repression of civil and political rights (e.g., freedom of movement, freedom of opinion or expression, freedom of sexual/gender orientation) a concern?

Are the rights of Indigenous Peoples (IPs) perceived to be abused?

Are there unconventional or non-transparent business rivalries in the country?

Is there a history of community opposition to development or investment projects?

Is there a lack of an active and coordinated civil society?

Will the project involve a community resettlement?

Are there high rates of gender inequality (political, economic, social)?

Are there high rates of violence/abuse (either officially reported or established via other means, such as community reporting, media, etc.)?

Is there meaningful access to services in incidents of abuse?

Ask yourself...

Is this a potential source of risk for your company?

Physical Environment

Are there real or perceived negative environmental impacts (e.g., soil, air, water, etc.)?

Are these impacts likely to disproportionately impact women or other disadvantaged groups?

Has past environmental performance of industry or other actors in the country or region been poor?

Is the area susceptible to natural disasters (e.g., typhoons, flooding, landslides, earthquakes, volcanoes, etc.)?

Are there groups that would be/are disproportionately impacted by natural disasters (e.g., women, children, etc.)?

Are there key environmental challenges or concerns in the prospective area of company operations (e.g., high levels of biodiversity, species at risk)?

Will/has the company's operations changed the physical environment in a manner that will have particular impacts on women and/or other disadvantaged groups (e.g., erecting a perimeter that blocks a key transportation route to a water source or trading venue)?

Tool 2.2

Sources of Risk to Women or Other Disadvantaged Groups

Note that Column 2 is not an exhaustive list but is designed to prompt thinking into the risks that may be relevant. Remember that you can add "other" security and human rights risks to those suggested.

Sources of potential risk	Potential security and human rights risks	Yes	No
<p>Conflict Situation</p> <ul style="list-style-type: none"> Recent history of conflict Potential for recurrence of conflict Potential for international conflict Illicit activity (e.g., drug trafficking, smuggling, etc.) Insurgency, armed separatist or guerilla group Unsettled territorial claims 	<ul style="list-style-type: none"> Sexual and gender-based violence used specifically as a tactic of war/conflict Genocide or violence against targeted disadvantaged groups (ethnic minorities, religious minorities, etc.) Destruction of community infrastructure that disproportionately impacts women or other disadvantaged groups (e.g., schools, places of worship, etc.) Exclusion of women and other disadvantaged groups from peacebuilding/disarmament, demobilization and reintegration processes Reduction of civic spaces, in particular for ethnic or religious minorities, following the proclamation of a state of emergency or state of siege Human trafficking (especially of women and girls) Tensions over influx of refugee populations 		



Annex B: Tool Templates

Sources of potential risk	Potential security and human rights risks	Yes	No
<p>Security Provisioning</p> <ul style="list-style-type: none"> • Low level of competence of public security providers • Low levels of competence of private security providers • Low level of resources • Poor human rights record by public security providers • Low understanding of human rights and humanitarian law by security providers 	<ul style="list-style-type: none"> • Sexual and gender-based violence – committed against members of the community • Sexual and gender-based violence – committed against security providers by other security providers • Inability of public or private security providers to adequately handle incidents of sexual and gender-based violence (e.g., lack of trained employees, lack of women guards, lack of proper facilities, etc.) • Lack of effective grievance mechanisms (judicial and non-judicial) • Use of firearms or other weapons in domestic violence incidents (either by public or private security providers) • Culture of fear/intimidation due to the presence of security providers • Security-induced restrictions close off civic spaces used by women and other disadvantaged groups to defend their rights 		
<p>Governance</p> <ul style="list-style-type: none"> • Corruption • Political instability • Weak rule of law • Poor governmental capacity • Limitations or repression on press freedoms, media, civil society freedoms • Disagreement between central and local governments related to resource extraction 	<ul style="list-style-type: none"> • Politically motivated violent attacks against disadvantaged groups in the extractives space (e.g., human rights defenders, labour union leaders, etc.); <ul style="list-style-type: none"> ◦ Heightened risk when they are women ◦ Heightened risk when they are Indigenous (women) • Growing restrictive legislation enables attacks and smear campaigns on civil society, putting women and disadvantaged groups in danger • Exploration of resources by international companies and their contribution to central government budgets are not accepted by local communities and lead to conflict which negatively affects women and other disadvantaged groups 		
<p>Socio-Economic</p> <ul style="list-style-type: none"> • Poverty; income or wealth disparity • Land or resource conflict • Ethnic or religious tensions • Tensions over resettlement • Concerns over negative social impacts of company activities (e.g., local inflation, negative impacts on social cohesion, etc.) 	<ul style="list-style-type: none"> • Increases in instances of domestic abuse/violence against women • Instances of sexual and gender-based violence perpetrated by security providers (public or private) • Tensions created due to increased income inequality between men and women, or between particular groups (e.g., Indigenous and non-indigenous) if hiring practices privilege men or specific groups (whether intentionally or unintentionally), and company wages are significantly higher than other employment or income-generating activities • Elevated risk of domestic violence for women hired by the company and receiving higher income • Increased risk of prostitution/trafficking for women and girls with influx of migrant workers, including public or private security providers 		

Sources of potential risk	Potential security and human rights risks	Yes	No
<p>Physical Environment</p> <ul style="list-style-type: none"> Negative environmental impact (e.g., air, water, soil, etc.) created by company activities Past poor environmental performance by industry Key environmental challenges (e.g., biodiversity, species at risk) 	<ul style="list-style-type: none"> Changes to physical environment that may have unintended negative impacts (e.g., blocking key transportation routes, placing security forces with poor human resource records in closer proximity to at-risk groups, etc.) Introduction of access roads that leads to an influx of people from elsewhere into or near vulnerable communities Introduction of worker camps that leads to an influx of foreign or non-native workers (predominantly men) near potentially vulnerable populations. 		



Annex B: Tool Templates

Tool 2.3

Identifying and Characterizing Risks

Type of Security or Human Right Risks	Risk I.D No./ Letter	Risk Statement or Scenario	Stakeholders Affected	Heightened Risk for Disadvantaged Groups	Actors Involved	Potential Consequences

Tool 2.5

Identifying Risk Treatment/Mitigation

Risk Level (Major/ Medium/Low)	Risk Scenario/ Statement	Considerations for Disadvantaged Groups	Possible Risk Treatment Measure(s)	Notes and Considerations



Annex B: Tool Templates

Tool 2.7

Risk Assessment Challenges

Type of Challenge	Description of Control/Influence	Action Item

Tool 3.1

Plan for Engagement with Public Security

Desired outcome(s) for interacting with public security	Steps you could take	Which steps do you think you'll take?
<p>Clear Communication on Expectations and Commitments – Governments and public security providers are aware of company expectations and commitments to respect the rights of women and other disadvantaged groups.</p>	<ul style="list-style-type: none"> • Identify and communicate relevant policies and procedures that demonstrate company expectations and commitments. These should include those relating to things such as: <ul style="list-style-type: none"> ◦ Prevention of Sexual Exploitation and Abuse ◦ Anti-discrimination ◦ Gender equality • Identify any potential points of resistance on the part of the government/public security forces • Involve levels of senior management/head office to demonstrate high-level buy-in to these expectations and commitments • Engage multiple departments within the company to ensure coherence and coordination on policies procedures related to these expectations and commitments • Other: 	
<p>Understand How Public Security Providers Will Handle Incidents of Rape and Other Forms of Sexual Violence – Public security providers have the resources and expertise required OR gaps/needs are identified and addressed.</p>	<ul style="list-style-type: none"> • Assess the capacity of public security providers (see Tool 3.3 below) • Prepare a list of measures, best practices, and resources that are needed for effectively supporting rape survivors • Identify organizations that could support or provide capacity building to law enforcement and public security providers to improve their ability to respond to incidents of rape • Other: 	
<p>Inclusive Company Communications – A clear communications plan for sharing information with women and other disadvantaged groups on the role of the company vis-à-vis security, its commitment to the VPs, and expectations and processes (e.g., grievance mechanisms) is prepared.</p>	<ul style="list-style-type: none"> • Create a timeline for creating the plan and identify those who should be involved • Engage representatives of various groups on the communications plan • Consider inclusive communication methods for women and disadvantaged groups (refer back to Tool 1.3) • Other: 	
<p>Understand the History of Conflict and Links to Public Security – The company adequately understands how previous/ongoing conflict affects/affected women, girls and other disadvantaged groups (this includes specifically the involvement of public security providers in sexual and gender-based violence, whether as members of the public security provider, or as ex-combatants integrated into the public security force or former private security guards).</p>	<ul style="list-style-type: none"> • Complete conflict analysis/desk-based research on public security in the particular country AND the particular location (including identifying potential individuals of concern who may currently be employed within the public security provider) • Engage knowledgeable individuals (human rights organizations, community organizations, etc.) to identify potential abuses that may not have been reported on • Identify key messages or asks to make to public security providers to mitigate any concerns (e.g., dismissal of individuals, redeployment of individuals where dismissal is not pursued, etc.) 	



Annex B: Tool Templates

Tool 3.3

Rapid Assessment Tool to Assess the Responsiveness of Public Security Providers to Women and Other Disadvantaged Groups

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Policy Framework/Commitment to Inclusion				
<p>Does the public security provider have the following policies (or comparable policies) in place?</p> <ul style="list-style-type: none"> • Code of Conduct • Prevention of Sexual Exploitation and Abuse • Anti-harassment • Anti-discrimination • Anti-racism or ethnic profiling 				
<p>Has there been any indication that the public security provider recognizes and prioritizes the importance of properly addressing gender-based violence?</p>				
<p>Are there equipment management procedures in place to ensure that public security providers do not use equipment in ways that violate the rights of women and other disadvantaged groups (e.g., weapons, uniforms, vehicles, cameras – both visible or undetected, recorders, etc.)?</p>				
Inclusion/Ability to Respond to Diverse Needs of Women				
<p>What is the number (or percentage) of women staff within the deployed security force?</p> <p>Is this adequate for ensuring the availability of women staff to deal with any incidents that require their specific presence (e.g., search of a detained person, escort of detained person to the toilet, support for a survivor of sexual abuse in distress, etc.)?</p>				
<p>What training do public security providers receive on specific forms of gender-based violence, including human trafficking, family violence and sexual assault?</p>				
<p>Are there special units/services to address gender-related crimes, such as anti-trafficking squads, or family support units? If yes, are they fully staffed and adequately resourced?</p>				

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Does the public security provider have adequate resources to respond to sexual violence (e.g., rape kit, counselling staff, coordination with social workers, etc.)?				
What facilities does each public security provider have for receiving complaints of and investigating gender-related crime (for example, private interview areas, forensic support, translators, detention facilities)? Are these facilities adequate? What are the conditions for women, men, girls and boys?				
Are survivors of gender-related crime able to file a report in their own language?				
Do the public security providers recognize the need to ensure the privacy rights of survivors of sexual violence?				
Have there been reported cases of gender-based violence carried out by the respective public security force? Have these been addressed? Have perpetrators been sanctioned? Have the survivors received adequate reparations?				
How far is the nearest location to report an incident? Are there any barriers for women to get to these locations (e.g., not within walking distance, cannot afford transport, cannot ask for friends or family to help with transport)?				
Are there any other potential barriers that may disproportionately discourage women from reporting cases of sexual violence (e.g., fee to make a claim/report, medical examination fees, judicial fees, translation fees, etc.)?				



Annex B: Tool Templates

Question	Yes	If yes, evidence/areas for improvement:	No	If no, progressive improvement measures companies can take:
Protection and Well-Being of Women Security Providers				
Have measures been put in place in order to ensure the safety and well-being of women security providers, including but not limited to: <ul style="list-style-type: none">• Equipment adapted to the needs of women;• Tailored shifts/partnering to maximize safety (i.e., women are not deployed to dangerous areas/situations that could be dangerous to them alone);• Shifts that are conducive for safe transport to and from work; and• Change in responsibility/tasks to accommodate the needs of pregnant/breastfeeding security providers?				
Are women and men paid equally? Do members of minority groups receive less pay? Are women and other disadvantaged groups promoted or present in senior-level positions?				
Is an internal grievance or complaints mechanism available to women security providers (or those from other disadvantaged groups) who experience harassment, intimidation bullying or sexual and gender-based violence?				
Do security providers receive gender equality training?				

Tool 3.5A

Developing a Safeguarding Approach in Responding to Security and Human Rights-related Grievances

Category of response	Guiding questions	Identified services/partners/ gaps in support
Physical/Health		
Emotional/Psychosocial Support		
Safety and Security		
Legal Assistance/Access to Justice		
Economic Assistance		



Annex B: Tool Templates

Tool 3.5B

Incident Reporting Template

Name of Complainant (optional)	
Address and contact details	
Age	
Gender	
Legal status	Refugee/Displaced Person/Immigration Status/Identification Papers
Name of Perpetrator (optional)	
Address and contact details	
Age	
Gender	
Legal status	Refugee/Displaced Person/Immigration Status/Identification Papers
Have we received informed consent from the abused person?	
When did the incident occur? (Date)	
What time did the incident occur?	
Where did the incident occur?	
Survivor's Physical Condition	
Are there any bruises, wounds or bleeding?	
Survivor's Psychological and Emotional Condition	
Describe the condition of the abused person. Do they show signs of shock, tension, panic or fear?	
Witnesses	
Were there any witnesses?	
Names of witnesses	Addresses and contact details

Brief description of the incident	
-----------------------------------	--

Accused details

Name	
Job description	
Place of work	
Address	
Age	
Gender	
Description of accused features and appearance	

Did any other parties intervene in the incident?

Who was interviewed? Did the police, the accused's organization, family, or friends intervene? What was the nature of the intervention?	
--	--

Assistance

Type of assistance	Yes/No	In what form?
Was medical care provided to the survivor?		
Was legal support provided to the survivor?		
Was financial support provided to the survivor?		
Was psychological support provided to the survivor?		
Was any other support provided? What was it?		



Annex B: Tool Templates

What security measures were taken to protect the survivor?	
Who is responsible for implementing the safeguarding measures?	
Any other useful information?	
Does the survivor want an investigation to be started? If yes, why?	
Author of the report (Name)	
Position and organization	
Date	
Time	
Location	
Signature of author of the report	
Signature of complainant (in case of informed consent)	

(Source: Organizational Safeguarding Best Practices and Procedures: A Toolkit - Women's International League for Peace and Freedom (WILPF) and Centre for Transnational Development and Collaboration (CTDC))

Tool 4.4

Action Planning

Task	Specific Action Items	Desired Output or Outcome
1. Record all allegations		
2. Conduct investigation into credible allegations		
3. Determine mode and extent of disclosure		
4. Pursue appropriate disciplinary or remedial actions		
5. Conduct lessons learned exercise		



Annex B: Tool Templates

Tool 5.1A

Evaluating the Accessibility of Grievance Mechanisms

Potential Barriers	Women	People with a disability	Indigenous women
<p>Location:</p> <ul style="list-style-type: none"> Is the location to file a grievance far from where women live and work? Would transportation be required? Is the cost prohibitive? Is the location a safe space (i.e., do potential complainants need to engage with potential perpetrators of abuses in order to access the mechanism and file a grievance)? Does the location ensure confidentiality? 			
<p>Technology:</p> <ul style="list-style-type: none"> Is the technology or process used for the grievance mechanism available on a device that is widely available? Has technical support been considered to facilitate its use, including access to an electronic device? Are there particular costs to engaging with this grievance mechanism technology or process that could be a barrier (e.g., buying airtime, cost of sending SMS message, paying to access internet for a laptop, time at an internet café, etc.)? Has another option been considered in locations with little or no internet connection, if the technology or process is web-based? 			
<p>Literacy and Language:</p> <ul style="list-style-type: none"> Are the various methods for submitting a grievance available in a language accessible to this group? Has the grievance form been pre-validated to ensure access for people with limited literacy? Can someone who has physical impairment (e.g., hearing loss, vision loss, etc.) use the grievance mechanism? 			
<p>Hours:</p> <ul style="list-style-type: none"> Is the grievance mechanism available at times of the day that are conducive (i.e., outside of working hours) for women and other disadvantaged groups? Is the grievance mechanism available on weekends as well as weekdays? Is there a time limit to file a grievance? 			
<p>Legitimacy/Trust:</p> <ul style="list-style-type: none"> Are there factors that could affect the trust of company grievance mechanisms? <ul style="list-style-type: none"> E.g., lack of addressing past grievances, application of an unreasonably short limitation period for filing a grievance, perception of the company working with public or private security providers involved in an incident – impacting its neutrality or support of the survivor. 			

Potential Barriers

Women

People with a disability

Indigenous women

Security Culture:

- Is there a culture of 'don't tell' amongst public or private security providers, or other company staff?

Stigmatization/Fear of Reprisal:

- Do women or other disadvantaged groups face potential reprisal at home/ at work/in the community if their grievance was made public? Use Tool 5.1B below in order to better understand the potential implications of stigmatization for various individuals based on their gender, race, ethnicity, religion, age, etc., depending on the type of abuse that occurs.



Annex B: Tool Templates

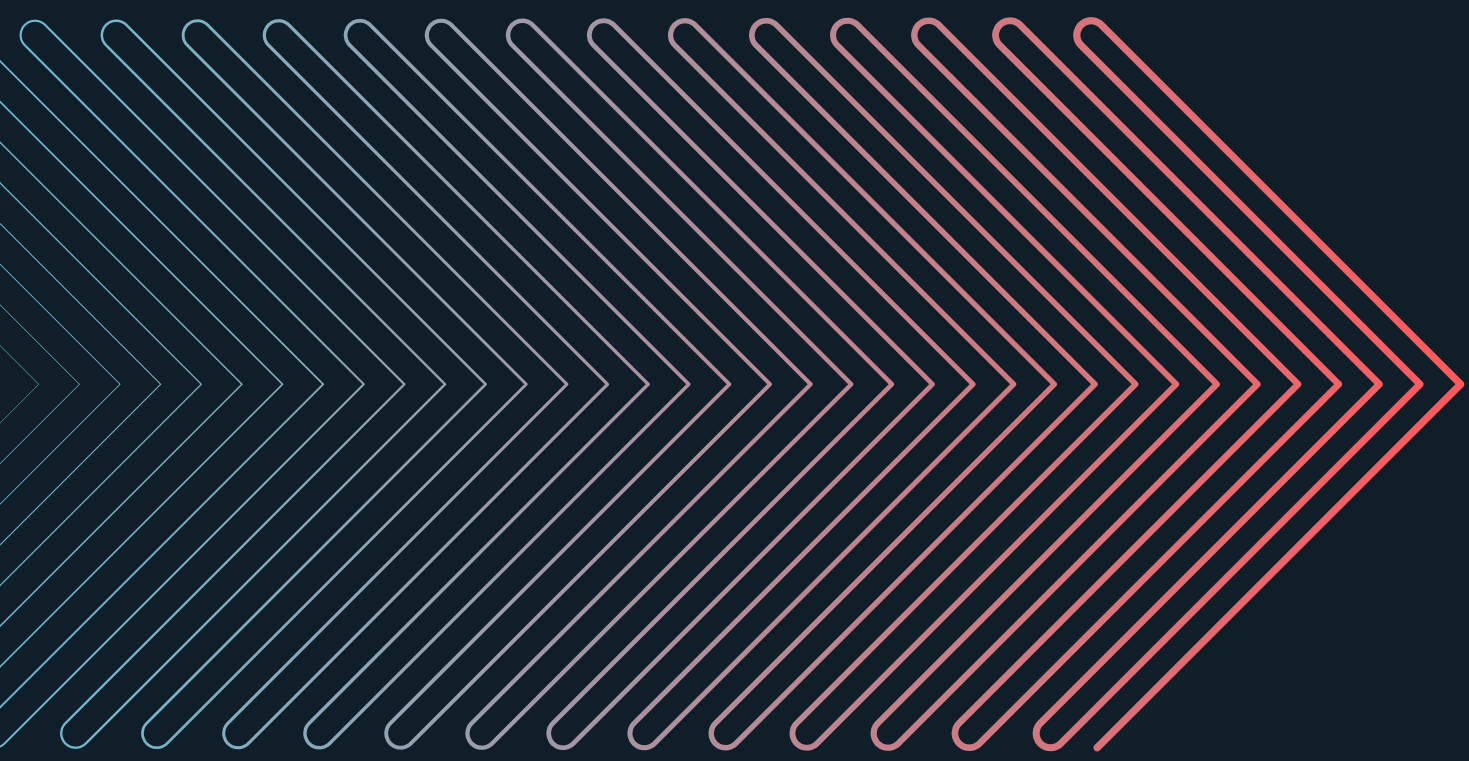
Tool 5.1B

Identifying and Understanding Risk and Stigmatization for Survivors of Sexual Violence

Type of Risk or Impact	Result of Risk/ Stigmatization	Likelihood	Mitigation Measures/ Response
Economic	<ul style="list-style-type: none">• Loss of income• Expenses for medical care (both immediate and long-term)• Inability to return to the workplace where the incident occurred for fear of intimidation or being revictimized• Loss of inheritance		
Social/ Relational	<ul style="list-style-type: none">• Rejection by husband/family/ community• Loss of custodial rights of children• Loss of social standing		
Psychological/ Emotional	<ul style="list-style-type: none">• Loss of self-esteem• Feeling of guilt, of not being believed• Post traumatic stress disorder/ anxiety disorder/depression• Loss of autonomy• Inability to engage in sexual relations• Sleep disruption (nightmares, insomnia, abnormal sleep patterns, etc.)• Emotional stupor		
Physical	<ul style="list-style-type: none">• Injuries/physical trauma• Unwanted pregnancy• Transmission of sexually transmitted disease(s)• Loss of fertility• Chronic pain• Domestic violence (resulting in injury or death)		

Who we are

The Voluntary Principles on Security and Human Rights (VPSHR) are an internationally recognized set of principles that guide companies on how to conduct their security operations while ensuring respect for human rights. The Voluntary Principles Initiative (VPI) is a multi-stakeholder initiative dedicated to sharing best practices and mutually supporting the implementation of the Principles.



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