

UKaid श्रीप Safeguarding Against Sexual Exploitation and Abuse & Sexual Harassment (SEAH) Risk Management

Overview of UKaid श्रीप's Safeguarding Policies and Practices

While safeguarding broadly means avoiding harm to people or the environment, in line with guidance from DFID Nepal, UKaid Skills for Employment Programme (श्रीप) is focused on tackling Sexual Exploitation and Abuse & Sexual Harassment (SEAH) through its interventions and building greater awareness and understanding of the risks and strategies that can enable safer, more empowering environments for the people we serve to support and uplift through partners and public engagements. These interventions also draw from WSP's global resources developed to promote safeguarding, gender-equity and diversity in the workplace.

Safeguarding against SEAH is part of श्रीप's Gender and Social Inclusion (GESI) intervention targeting women, Disadvantaged Groups (DAGs), and People with Disabilities (PwDs). WSP, together with its consortium partners and Challenge Fund partners, aims to understand the transformational challenges that firms and Nepalis face and jointly explore how GESI and Safeguarding integration can contribute to addressing those challenges.

Details on UKaid श्रीप's GESI analysis and strategies, developed in early 2019 are available here: <https://bit.ly/3iqYJc>

श्रीप advocates for systematic changes at the organization and industry levels to advocate for employee/worker safety, by informing and sensitizing partners on GESI and Safeguarding. WSP, through its Safeguarding Policy, is committed to promoting safety and health in the communities it serves in through the people and institutions it interacts with and aspires to support. This policy has drawn from our greater WSP corporate policies, procedures, and training requirements relating to behavioural misconduct including but not limited to issues concerning bullying, harassment, quid pro quo and sexual misconduct in the work place, including within delivery chain partners as well as the responsibility to report incidents of misconduct.

Because of these interventions, UKaid श्रीप's private-sector partners – both firms and associations – are introducing or strengthening their GESI practices and Safeguarding Policies—several for the first time in their company's history.

Steps Taken by UKaid श्रीप to Introduce GESI & Safeguarding Practices to Partners

श्रीप takes several steps to ensure that its Challenge Fund partners are well informed about the importance of GESI mainstreaming and Safeguarding and subsequently adopt evidence- based good practices for their project and throughout their organization. Following are some of the steps taken by the Programme.

1. GESI lens and a clear set of programme-issued guidelines is used to inform the design of the partnership from the Investment Application phase with probing and solution-finding through the following key questions:
 - What GESI barriers will the Challenge Fund project address?
 - Which GESI groups does the project target? How many?
 - Is the Challenge Fund window and model appropriate for overcoming the barriers that GESI target groups face?
 - How will the Challenge Fund partner put in place safeguarding and protection measures?
 - Does the Challenge Fund partner have a Diversity Focal Point?
 - Has the Challenge Fund partner reached out to श्रीप's GESI point of contacts for technical input?
 - Are there indicators that measure GESI outcomes?
 - How does the Challenge Fund partner plan to continue GESI integration after its partnership with श्रीप comes to an end?

2. Partner Orientation and Anonymous Reporting (Hotline) Mechanism: All Challenge Fund partners are required to go through an orientation session, as part of the project commencement, with the शीप team for a deep-dive discussion and understanding of the Programme and the role that the partnership plays in achieving the overall outcomes. During this day-long session, attended by key partner staff, including leadership team and representatives from implementation, marketing, finance/admin/operations, and others, GESI concepts and practices and Safeguarding is covered. For many, this is usually the first interactions on and exposure to insights on GESI and Safeguarding.

During this session, partners are also informed of the WSP's anonymous reporting mechanism in Nepal, an 'anonymous hotline number and e-mail id from WSP, that partner staff and beneficiaries, including those at the field-level can use to report discrepancies and grievances. Partners are encouraged to share this number widely within their staff and beneficiaries. (see Figure 1).

3. GESI and Safeguarding Integrated in regularly organized Partner Meetings: All **Monthly Partner Meetings** start off with a "Safeguarding Moment" where we ask for a) any new Safeguarding Plans & Policies they might have in place; b) discuss examples drawn from global experiences; and c) seek updates on any safeguarding instances or cases that might have taken place in their organization or as part of the partnership in the last one month. The practice of initiating the monthly discussion with GESI & Safeguarding questions reiterates our commitment to ensure inclusion and prioritize employee/trainee safety as part of the partnerships. This, in turn, has let to partners taking stock of their GESI targets and spearheading Safeguarding initiatives within their organizations. Similarly, शीप has also organized quarterly **Strategic Partnership Review** sessions with partners and monthly **Peer-to-Peer Learning** sessions. GESI and Safeguarding is front and centre in the agenda during these engagements as well.

To encourage regular, systematic dialogue and follow-up mechanism on GESI and Safeguarding, शीप is also in the process of forming a **GESI Working Group** with its partners, starting with September 2020. This group will serve as a peer-to-peer learning space for partners to share first-hand experiences and learnings, every quarter, and encourage wider adoption of good practices. For शीप, this also give us an opportunity to take stock of GESI target achievements and collectively strategize for the future with partners.

4. GESI integration in Outreach and Communications by UKaid शीप and Partners: Almost all partners have marketing and outreach activities as part of the workplan co-developed and pre-agreed with शीप. In order to ensure that women and DAGs are well represented and targeted through these marketing and outreach campaigns, the partners are required to share their outreach plans with शीप team prior the final approval, and often also encouraged to consult with शीप on the design of such plans. In Figure 2 below, is the GESI-sensitive and-intention language guide

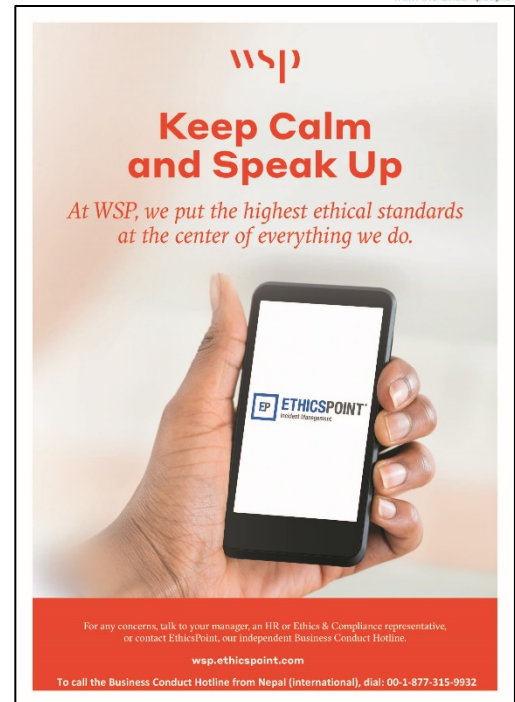


Figure 1: WSP Helpline Mechanisms.

¹ WSP is in the process of updating the number for Nepal to make it more accessible for locals; once updated the revised hotline details will be shared widely.

suggested. In doing so, partner communication and outreach activities are able to reach women and DAGs through campaigns which would have traditionally been stereotypical or devoid of GESI focus.

5. Diversity and Inclusion Award: 2020 onward, सीप plans to recognize partners who demonstrate significant progress and achievements on GESI with a Diversity and Inclusion Award, which will be the first of its kind in Nepal. This will be designed to elevate the discourse on GESI and Safeguarding in Nepal and co-developed with relevant market actors to ensure credibility and reach. The Award will recognize Challenge Fund partners' efforts and achievements, create champions important for norm change, and improve opportunities for the diverse communities that सीप services.

Summary of Safeguarding Risks and Mitigation Strategy and Plans

UKaid सीप has identified certain risks involved while introducing and implementing Safeguarding practices with its partners. Through continued engagement with partners on Safeguarding and SEAH issues, the following risks have taken into consideration and strategies and plans have been put into place to minimize these risks. This risk analysis has continued throughout the Covid-19 pandemic lockdown as well. We recognize that the complexities brought about by the pandemic has made vulnerable population more susceptible to exploitation and abuse. Therefore, our risk and mitigation strategy and plans also addresses the possible threats brought about by the pandemic.

Guidance on Using GESI-sensitive Language

- When faced with a situation describing people in general, consider alternatives to the generic “man” label.
- Avoid descriptions of jobs, roles or personal characteristics that reflect gender-specific stereotyping.
- When preparing photos, videos, brochures, slides or graphics for presentations, represent women and men actively participating in all aspects of life at home, school, work or within the community. Men and women can be shown in non-traditional roles such as women as plumbers or men as caregivers.
- Promote a balanced presentation of women in authority positions. Consider posture and positioning within a picture to help establish that this balance is present; for example, avoid portraying men behind desks and women standing to the side.
- It is important to ensure that animation or cartoons do not base their humour on gender stereotypes.
- A balance of images to reflect the population is recommended, such as representation of people from DAGs and differently-abled population.

Figure 2: Guidance provided to partners as part of the General Branding and Visibility Guidance for सीप Partners

Risk	Mitigation Strategy & Plans
Partners who have not been sufficiently vetted or trained in safeguarding against SEAH may pose a risk to vulnerable people, or fail to support them to seek help	<ul style="list-style-type: none"> • Champion Safeguarding regularly and systematically with all partners (e.g. Monthly Partner Meetings; Quarterly Strategic Review; and Peer-to-Peer Learning) • Review GESI and Safeguarding as part of due diligence of prospective partners • Orientation and training to partners and development of partner-specific GESI and Safeguarding policies/code of conduct • Share and promote guidance for Safeguarding against SEAH • GESI and Safeguarding integrated in reporting procedures (e.g. monthly reports and quarterly reports from partners)
Women are likely to be at an increased risk of experiencing SEAH at workplaces where male workers are in high demand. This also results in challenges to reporting in male dominated workforces, with inadequate safeguards against SEAH	<ul style="list-style-type: none"> • Work with partners to prioritise engaging with, and informing male leaders, trainers, and all trainees on SEAH and reporting mechanism • Check regularly that SEAH safeguarding measures are being adhered to

Risk	Mitigation Strategy & Plans
	<ul style="list-style-type: none"> UKaid सीप's anonymous hotline shared with all partners—who have been encouraged to disseminate it for awareness and access by staff, trainees, and workers at all levels.
Marginalised groups and PwDs are at higher risk of experiencing SEAH due to widespread discrimination against them	<ul style="list-style-type: none"> Encourage partners to conduct awareness raising activities targeted at PwDs, on how to report SEAH Integration of GESI and Safeguarding is encouraged in skilling curriculums/manuals.
Migrant workers returning during COVID-19 are vulnerable to SEAH	<ul style="list-style-type: none"> Ensure that partners working to onboard returnee migrants in their workspaces/factories are fully aware of exploitation risks faced by these groups and have a strategy to create a safe working environment for them Encourage partners to disseminate messages which dispels myths and rumours about returnees in connection with Covid-19
Economic pressure brought about by Covid-19 might compel children, who are not in school, to work in construction sites or factories	<ul style="list-style-type: none"> Be clear that DFID and UKaid सीप does not tolerate child labour, or SEAH of children Ensure that SEAH messaging targets children and families who are most vulnerable
Partners capacity to reach and support beneficiaries during Covid-19 has decreased. This might result in fear to report any cases of SEAH due to misconceptions that support might be limited or unavailable	<ul style="list-style-type: none"> Ensure that whistle-blowers and victims of SEAH receive support despite any reductions in capacity; UKaid सीप's anonymous hotline shared and reinforced regularly.

Illustration of GESI & Safeguarding Policies and Practices Adopted by Partners

Nepal Yarn Manufacturers' Association (NYMA) – Introduction of GESI-enabling infrastructure and Policies (from Recruitment, Retention, to Safeguarding)



Through continued guidance and support from सीप, NYMA and its partner industries are now promoting participation of women across the industry and introducing new initiatives, such as the construction of onsite lodging, accommodation and washroom, especially for women trainees and staff; all this is contributing to make quality training and access to steady jobs possible for women. Improved security and safety measures have also been taken into consideration to ensure well-being of women workers. For example, at Triveni Spinning Mill, the first batch of 18 women were onboarded for training, and subsequent employment, in January 2020. Until July 2020, the factory has trained and placed around 406 women within the factory with separate washrooms, changing rooms, and 21 rooms been built specifically for women. Similarly, Reliance Spinning Mills is also making provisions for women-friendly spaces such as establishing a childcare house. The factories are going through a cultural and structural transformation to hire as well as enable retention of more women. More importantly, NYMA is also advocating for equal pay for women working at these

factories and for the women employees to play the role of referral champions in their community to inform and attract greater number of women

Another key milestone of this partnership is the development of a Safeguarding Policy, first to be introduced by the four consortium partners, which will intended for dissemination and adoption by the wider industry. This policy ensures health, wellbeing, and safety of all workers, staff, trainers, executives, and trainees/workers of consortium partners regardless of their gender, age, identity, physical disability, sexual orientation, and ethnicity. NYMA's Safeguarding Policy ensures their right to protection - from injury, violence, neglect and exploitation of every sort. NYMA has zero tolerance on employee violence, mistreatment, and harassment.

NYMA's consolidated Safeguarding Policy, developed by taking into consideration the individual corporate policies of all its partners and the Government of Nepal's Safeguarding Policy and Nepal Labor Act 2074, local guidance and procedures, once finalized will be disseminated publicly to encourage further adoption by the industry.

MAW Earthmovers Pvt. Ltd (MEPL) – GESI-sensitive marketing and communications; and integration in Training Implementation Guidelines



As a part of its partnership with शीप, MEPL is making a conscious effort to promote women in the field of heavy equipment, where women operators are typically unheard of. **As a part of its strategy to enroll more women and people from disadvantaged communities into the Heavy Equipment Operators (HEOs) training, MEPL has introduced inclusive marketing campaigns and is also providing scholarships to 50 deserving, underprivileged applicants who cannot afford the training on their own.** Besides establishment of the JCB Operator Training Center (OTC) and improved infrastructure at JCB OTC at Nepalgunj, they are forging partnership with local organizations, including NGOs and community network, to ensure onboarding of the targeted job seekers from Province 2 and 5.

In order to institutionalize onboarding of women and people from disadvantaged communities in its ongoing and future training programmes, **MEPL, through the MAW Skills Academy, has now developed Training Implementation Guidelines (TIP) which includes sections on GESI and Safeguarding.** The guideline strongly focuses on the effective participation of women and DAGs in its training programmes and future employment. It also encourages the MAW Group of Companies to establish a favorable institutional and policy environment for mainstreaming GESI.



Rojgari Services:

Since the partnership began in September 2019, Rojgari has developed marketing campaigns that seek to address the employment needs of GESI target groups with content and collaterals that challenge stereotypes and via targeted outreach through social media and other sources (e.g. coordinating with NGOs that service GESI groups). In addition, through the Ghumti Rojgari Pasal, Rojgari is able to reach deep and wide, breaking access/geography barriers by travelling directly to the doorsteps of women and other socially excluded groups; this has proven an effective tool in bridging information and service gaps especially for women and other disadvantaged groups. . Through its outreach and engagement in Province 2, recognizing opportunities for GESI-focused Montessori-based Teacher training, Rogari was able to swiftly launch a new training package using Early Childhood Development (ECD) Curriculum for women, keeping it both practical and hands-on,

in line with the needs of the market (moving away from Rote learning). Addressing opportunities based on local market gaps, is providing upward mobility for local women by enhancing skill sets that are lacking.



Rogari Services has also revised their Employer Sensitization Curricula and Plans, to bring a stronger emphasis on GESI and Safeguarding while engaging with their industry partners. The Employer Sensitization manual will be further refined based on learnings and feedback from सीप and other partners/employers.

With continuous input from the सीप team in its outreach plans and also on upgrading their website and mobile applications, Rojgari has been able to reach and onboarded over 220 employers (until March 2020) in various sectors. Rojgari Services has also recruited external experts to train their staff on GESI and Safeguarding.

Label STEP

Label STEP has been working in the handmade carpet industry since 1995 (and in Nepal since 1997), verifying compliance of working conditions with international fair-trade standards and implementing projects for the well-being of carpet weavers and workers. Supported through UK aid Skills for Employment Program, the Label STEP has set-up artisan villages in Province 2 to manufacture and export high value rugs in the international market through training of highly skilled weavers.

Label STEP undertakes regular awareness program on 10 Fair Trade Standards, and GESI and Safeguarding principles (such as non-discrimination, prevention from harassment, fair wages) are the overarching focus of the STEP's awareness program. All STEP affiliated, and सीप-supported workshops in Sarlahi, are regularly audited per fair trade standard compliance criteria and corrective actions are provided in cases of non-compliance. The Standard's social and environmental requirements are based on the core ILO conventions, mainly: ILO Conventions 155 on Occupational Health and Safety, 177 on Home Work, 131 on Minimum Wage Fixing, 138 on Minimum Age, 182 on Worst Forms of Child Labour, 100 on Equal Remuneration, 111 on Discrimination, 143 on Migrant Workers, 158 on Termination of Employment, 87 on Freedom of Association, 98 on Right to Organise and Collective Bargaining, 135 on Workers' Representatives, 154 on Collective Bargaining, 29 on Forced Labour and 105 on Abolition of Forced Labour, 1 on Hours of Work and 14 on Weekly Rest. Regular audits of these fair-trade workshops ensure safeguarding measures and standards are always prioritized. Some of these workshops are also adding childcare facilities to support weavers with young children to be regularly participate in economic activities.

Genese Solutions

In an effort to close the gender digital gap and promote female role models in the ICT sector, सीप played a catalytic role in introducing Girls in Tech (GIT)-Nepal through partner Genese Solution. Girls in Tech-Nepal has successfully mobilized its networks to increase visibility, championing issues and role models that draw attention to and encourage greater participation of women in ICT. Through various events and marketing campaigns, since January 2020, they have supported Genese in reaching nearly 700 women, of whom about 400 were onboarded for the subsequent trainings.

Summary of GESI & Safeguarding Priorities/Intervention to Address Key Constraints

UKaid सीप's GESI conceptual framework (see Figure 3) categorizes the barriers that women, disadvantaged groups and persons with disabilities face to obtain or improve gainful employment into three domains:

1. **Assets, services and opportunities:** Assets can be economic (property, digital), social (network and community), and human (education and health). Services include access to financial services, sector-specific services such as extension services in agriculture, government services such as registering small businesses. Opportunities to develop human capital such as scholarships or access to training programmes.
2. **Personal and collective agency** is the ability to control and make decisions whether as an individual or a group.
3. **Enabling environment** includes both the formal (legal systems) and informal (social norms, values, culture). All three domains influence each other.

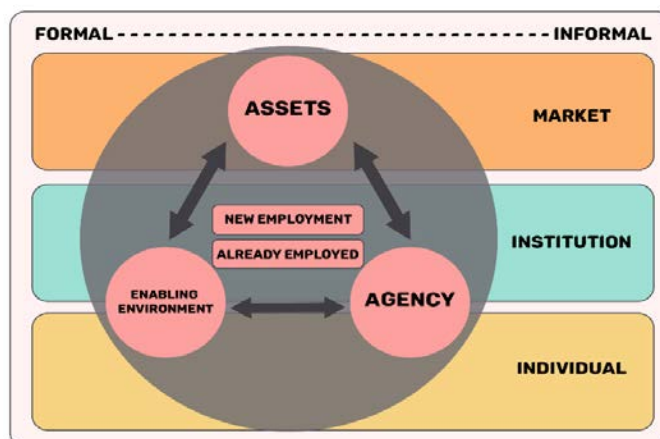


Figure 3: GESI Conceptual Framework

Based on this Conceptual Framework, सीप has identified the constraints/barriers and strategic priorities as follows. Many of the strategic priorities/interventions have been adopted by partners, which will be improved, adjusted, and institutionalized, based on learnings and value-add to the industry and its stakeholders, including trainees and workers, over the course of the partnership.

Constraints/Barriers	Strategic priorities
Agency	<ul style="list-style-type: none"> • Soft skills training integrated to build representational and negotiation capacities in addition to vocational /entrepreneurial training.
Access to Finance to Increase Affordability to Quality Skilling Programs	<ul style="list-style-type: none"> • Targeted scholarships and grants from industries, Government, and Financial Institutes. Prabhu Bank, for instance, has committed 10 scholarships for women who opt for skilling available from Fusemachines and Genese Solutions. • MEPL has committed 50 scholarships for women and DAGs. • Prabhu and NSBI has launched loan products for returnees to facilitate business start-ups with emphasis for women returnees to access loans and financial products.
Information Asymmetry	<ul style="list-style-type: none"> • Targeted outreach to local organizations with access to and serving women, PwDs, and DAGs to inform and attract the most vulnerable groups to high-quality services. For example, the Ghumti Rojgari Pasal, initiated as part of Rojgari Services partnership with सीप, has been able to reach the most remote and vulnerable population in Province 2 with information on training and employment opportunities. • GESI-sensitive communications, outreach, and marketing approach adopted by partners such as MEPL, NYMA, Rojgari Services, SAF and Genese Solution is contributing to higher number of enrolment by women in trainings.
Challenging Stereotypes/Mindsets	<ul style="list-style-type: none"> • Challenge adverse gender norms by painting positive pictures of women. • Support disadvantaged groups to upgrade their skills and trade to high value areas such as upskilling women from migrant returnee

Constraints/Barriers	Strategic priorities
	<p>households in Saptari and Sarlahi, via Label STEP, to modernize their craft skills and products in line with the quality requirements of high value markets.</p> <ul style="list-style-type: none"> • Increase enrolment of women in ICT disciplines and trainings and challenge adverse gender norms via Girls in Tech established through Genese Solutions. • Increase women staff in industries and improve GESI friendly infrastructure. NYMA and its partner industries have improved infrastructure adhering the GESI friendly environment. Triveni Spilling Mills started to train and recruit women in the history of 20 years of its establishments and the result is very encouraging with high productivity, well-disciplined working environment.
Lack of Understanding and Enabling Policies	<ul style="list-style-type: none"> • MEPL has integrated GESI and Safeguarding in its Training Implementation Guidelines
Supportive Services	<ul style="list-style-type: none"> • Transport schemes that address both affordability and adverse gender norms • Affordable housing for relocation e.g. by NYMA-aligned industry. • Improve assistive services for people with disabilities
Dignified Employment	<ul style="list-style-type: none"> • Set targets for partners to increase participation/enrolment of women, people from disadvantaged/socially excluded communities, and PwDs so that discrimination does not begin at the early stages of recruitment. • As part of the partnership with शीप, MEPL's Training Centres have set a target for enrolling female trainees in each training programme and that 60% of the total trainees should be from disadvantaged and marginalized groups.
Unequal Pay	<ul style="list-style-type: none"> • Inform partners about the law on equal pay for equal work. • Encourage equal pay practice • NYMA is advocating for equal pay for women working at the partner factories.
Lack of Sensitivity from Training Providers	<ul style="list-style-type: none"> • शीप partners are encouraged to collaborate with instructors, training institutes that are GESI sensitive and can identify with/share characteristics with target groups. For example: Label STEP's artisan villages in Sarlahi aims to re-create the success stories of the handmade carpet industries by mobilizing the migrants and the households to set up the artisanal carpet manufacturing hub in the weaver's origin communities. To this end, the project has migrant returnees and their families involved in various capacities as Investors, Master Weavers, Trainers and aspiring entrepreneurs.
Imperfect Information	<ul style="list-style-type: none"> • Sensitize employers/partners so that they recognize and understand the financial benefits of a more diverse workforce e.g. in the revised Employer Sensitization Manual developed by Rojgari Services