



Social Performance Management Guide

Tools for integrating ‘Do No Harm’ protections for Women’s Economic Empowerment Actors

Version: January 26, 2022

Primary Audience

Management-level staff that lead strategy and program development and oversight for Women’s Economic Empowerment (WEE) Actors. WEE Actors are entities or individuals that support the development or expansion of women’s businesses, provide livelihood or financial services, and/or support women (globally) in efforts to increase their access to economic opportunities, especially those living in developing economies.

Goal

Improve social performance management towards a stronger, Do No Harm approach.

Objectives

Through the use of this guide, WEE Actor management-level staff will have:

- Identified areas of performance improvement which demonstrate intent, commitment, and processes for mitigating the risks of potential unintended consequences of WEE programming.
- Have accessed validated survey questions that can be added to participant satisfaction, exit, or outcomes surveys to measure and monitor whether a participant is resorting to harmful coping mechanisms or experiencing the unintended consequences of WEE programming.
- Considered safeguarding and gender policy and code of conduct language that can be adopted or adapted to demonstrate organizational intent to do no harm and commitment to gender equity and equality.

SETTING THE FOUNDATION
Phase 1

BUILD THE STRUCTURE
Phase 2

ENGAGE PARTICIPANTS
Phase 3



Funding is provided by the United States Department of Labor under cooperative agreement number IL-31469. 100% of the total costs of the project or program are financed with federal funds, for a total of \$1,872,000 dollars. This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the United States Government.



Table of Contents

About the RICHES Project.....	3
How to Use the Social Performance Management Guide.....	5
Phase 1: Setting the Foundation	7
Tool 1: Social Performance Management Assessment	7
Phase 2: Build the Structure	35
Tool 2: Example ‘Unintended Consequences/Negative Coping Mechanisms’ Survey Questions	35
Tool 3: Gender Policy Template	44
Tool 4: Safeguarding Policy Template	49
Tool 5: Code of Conduct Template	60
Tool 6: Do No Harm Assessment for Projects, Products, Services.....	64
Annexes.....	71
Acronyms and Glossary of Terms.....	71
Acknowledgments.....	78



About the RICHES Project

Few would expect that investments in women's enterprises are increasing the risk or incidence of harmful work for children (child labor) or adults. However, [research](#) conducted by the *Reducing Incidence of Child Labor and Harmful Conditions of Work in Economic Strengthening Initiatives* (RICHES) project unveiled that as women entrepreneurs struggle to manage the labor burdens of their businesses along with household tasks and child care many are turning to those closest in reach for help—their children.

Grameen Foundation, in partnership with the American Bar Association Rule of Law Initiative and funded by the U.S. Department of Labor, Office of Child Labor, Forced Labor and Human Trafficking (OCFT), launched the RICHES project with the goals of supporting women's enterprises responsibly, and mitigating the risk of harmful work for children and adults or the use of other negative coping strategies. To achieve this goal, RICHES has developed a toolkit for Women's Economic Empowerment (WEE) Actors to equip them with practical ideas and tools to integrate and assess child protection and safe business practices throughout their work. For the purposes of the RICHES project, WEE Actors are any entity or individual that supports the development or expansion of women's businesses, provides livelihood or financial services, and/or supports women (globally) in efforts to increase their access to economic opportunities, especially those living in developing economies.

The RICHES toolkit is organized in three phases (see Figure 1 below).

Phase 1 represents a **minimum set of practices** and related tools that all WEE Actors should have on hand and use to promote child protection and safe and healthy business practices within women's economic initiatives and/or businesses. Phase 1 covers:

1. Building awareness of the risks to children and women's health and safety when supporting women's businesses or WEE activities;
2. Assessing the risks and identifying situations of harmful work for children and adults and how to remedy these issues;
3. Committing to Do No Harm principles when developing and/or implementing women's economic initiatives; and
4. Knowing where to go for help and where to find resources.

Phases 2 and 3 offer a more comprehensive approach to child protection and health and safe business practices through market research, training and assessments at the organizational level, direct participant training, product development, and monitoring and evaluation.



Figure 1: RICHES Toolkit for WEE Actors



Toolkit for WEE Actors

SETTING THE FOUNDATION Phase 1

Start here: Use these tools to build **management-level** awareness and understanding of organizational and program risks of harmful work for children and adults.

- **Making the Case Presentation**
 - **Risk Assessments**
 - **Social Performance Management (SPM) Guide** (SPM Assessment Only)
 - **Understanding Harmful Work Training** (with Management Only)
 - **Linkages Guide** (Emergency and External Support Contact List Only)
-
- **Investor’s Guide** (For Investors Only)

BUILD THE STRUCTURE Phase 2

Use these tools to build **frontline staff-level** awareness and prioritize new or improved products and services.

- **Social Performance Management (SPM) Guide** (All tools)
- **Understanding Harmful Work Training** (with All Staff)
- **Market Research Guide**
- **Financial Services Guide**
- **Design Workshop**

ENGAGE PARTICIPANTS Phase 3

Use these tools to build **participant-level** awareness and support their needs.

- **Linkages Guide** (All tools)
- **Business Diagnostics Guide** (Paper + Digital Versions)
- **Intra-Household Dialogue Guide**
- **Risky Business Curriculum** (Paper + Digital Versions)
- **Monitoring and Evaluation Guide**



How to Use the Social Performance Management Guide



The Social Performance Management Guide is designed to be part of two Phases of the RICHES Toolkit: **Phase 1: Setting the Foundation** and **Phase 2: Build the Structure**.

Phase 1: Setting the Foundation, includes one tool:

- **Tool 1: Social Performance Management (SPM) Assessment.** This tool provides a framework to help a WEE Actor assess their policies and practices related to mitigating harm that their projects, products, and services can have on participants and their households, as well as policies and practices related to gender mainstreaming. The tool builds upon a SPM framework designed by the Social Performance Task Force (SPTF) and proposes additional standards of practices related to mitigating the risks of the unintended consequences of WEE programming.

Phase 2: Build the Structure includes five tools that assist an organization in improving practices identified through use of Tool 1: Social Performance Management Assessment completed in Phase 1:

- **Tool 2: Example ‘Unintended Consequences/Negative Coping Mechanisms’ Survey Questions:** This tool provides survey questions that could be integrated into existing monitoring and evaluation surveys to measure the use of negative coping mechanisms by participants and unintended consequences of WEE programming.
- **Tool 3: Gender Policy Template:** This tool provides example policy language that helps a WEE Actor articulate its intent to be responsive to the needs of women and other vulnerable groups.
- **Tool 4: Safeguarding Policy Template:** This tool provides example policy language that helps a WEE Actor articulate its intent to be aware of and mitigate risks their projects, products, and services can have on its participants.
- **Tool 5: Code of Conduct Template:** This tool provides example code of conduct language, with emphasis on language regarding harmful work for children and adults and sexual exploitation and abuse and sexual harassment that may be new to many WEE Actors.
- **Tool 6: Do No Harm Assessment for Projects, Products, and Services:** This tool provides a framework for assessing potential harm of a specific project, product, or service based on 10 basic dimensions.

Process Description: This guide promotes the basic standards of practice that should exist among all WEE Actors to demonstrate intent, commitment, processes, and achievements for mitigating the risks of the unintended consequences of WEE programming. Please note that while much of the guidance is specific to harmful work for children and adults, the tools within this guide are designed to broadly address Do No Harm to ensure that WEE Actors can also use these standards to influence practices related to other areas of risk, such as gender-based violence and harassment, environmental harm, etc.



Each Tool within this Guide has its own instructions for use. None of the tools are designed to be implemented with children.

Important Concepts to Note:

Harmful work for children, or child labor, is any work that hinders a child’s development and work that is: a) physically, mentally, or morally dangerous and harmful for children; and b) interfering with a child’s schooling. For the purposes of the RICHES project, the term **harmful child work** is also used interchangeably with **harmful work for children** or **child labor**.

For the purposes of the RICHES project, the term **harmful working conditions** is used interchangeably with **harmful work for adults, unacceptable conditions of work** or **UACW**, and refers to any work that is detrimental and is often based on wages (ex. whether work provides a living wage), work time and rest days (ex. hours of work that exceed eight hours a day or 48 hours per week), or harmful working conditions (poor occupational health and safety conditions). *The [ILO](#) defines UACW as work that “denies fundamental principles and rights at work, put at risk the lives, health, freedom, human dignity and security of workers or keep households in conditions of poverty.”*

Adaptations: Each individual tool presented in this guide provides guidance on adaptation, where needed.

Languages: The guide is available in English, Spanish, and French.



Phase 1: Setting the Foundation

Tool 1: Social Performance Management Assessment

Background: The **RICHS SPM Assessment** builds on the Universal Standards for Social Performance Management (SPM)¹ and the Social Performance Indicators (SPI-4)² tools developed for the finance sector, which includes financial service providers that serve low-income populations. SPM refers to the “systems that organizations use to achieve their stated social goals and put customers at the center of strategy and operations. A service provider's **social performance** refers to its effectiveness in achieving its stated social goals and creating value for participants. If a service provider has strong SPM practices, it is more likely to achieve strong social performance.”³

The **RICHS SPM Assessment** is designed to complement the Universal Standards for SPM to assist a service provider in assessing how well it performs against a set of good practices related to protecting program participants, particularly female entrepreneurs and their children, from unintentional harm. The standards assess a service provider’s intent to do no harm, its leadership’s commitment to do no harm, the processes and practices designed to limit harm, and the outcomes achieved over time. “Do No Harm” is an ethical obligation to make all reasonable efforts to be aware of, to mitigate, or to eliminate risks that communications, outreach, programs, products, services and other activities may do to cause physical, emotional, financial, sexual, or spiritual harm of employees, participants or other stakeholders. Do No Harm can also be referred to as “Safeguarding.”

The **RICHS SPM Assessment** also aims to address a service provider’s capacity to be gender responsive⁴ in its practices with both staff and participants, given the impact these practices can have on effectively serving women and other marginalized groups.

Note: This tool only provides a snapshot of the standards of practices promoted by the Social Performance Task Force (SPTF) for financial services providers. A complete set of instructions on how to conduct a full SPM assessment can be found at the [SPTF](#) website. Accessing and using the SPI-4 tool can be found at the [Cerise](#) website.

Process Description: The **RICHS SPM Assessment** can be used by an SPM champion or relevant management team staff who has access to strategy and operational plans, human resources guides, market research studies, organizational outcomes or impact assessments and participant satisfaction or exit studies. This assessment can be conducted annually or in sync with social ratings or self-assessments of the service provider’s policies and practices.

¹ Wardle L. 2017. [The Universal Standards for Social Performance Management: Implementation Guide](#). Social Performance Task Force (SPTF).

² Cerise. 2021. [SPI-4](#).

³ SPTF. 2021. [“What is SPM?”](#)

⁴ Gender responsive is defined as approaches that considers gender norms, roles, and relations as well as specific needs for women and men and how they affect access to and control over resources. Gender responsive approaches intentionally target and seek to benefit marginalized groups to achieve program goals. The next level, gender transformative approaches, would require stronger indicators that demonstrate a service provider’s interest in changing social and cultural norms among their staff and target populations. The indicators are not currently written this way in this tool.



Steps:

Step 1: Print out one copy of the tool for each person completing the assessment.

Step 2: Gather the policies and other documents mentioned in the “Materials Needed” section below.

Step 3: Review the **Standards of Practice** column and the recommended associated policies and/or documents mentioned in the **Evaluation** column in *italics*.

Step 4: Determine whether you believe your organization adheres to or accomplishes the recommended standard of practice and write “Yes”, “No” or “Partially” in the **Evaluation** column.

Step 5: Describe qualitatively how the organization is (or is not) meeting the standard of practice in the **Evaluation** column.

Step 6: In the **Next Steps** column, articulate the specific actions the service provider can take to improve upon a particular practice in the short- or long-term. Guidance and example tools that can help support achievement of the standard of practice are provided in the **Next Steps** column in *italics*. To support achievement of the standards, website links to relevant tools available in the RICHES toolkit, or other relevant resources from external sources, are provided in the **Next Steps** column.

Materials Needed: A printer and/or copier and copy paper for printing this tool. Also, it would be helpful to gather the following types of documents relevant to your specific business or organization’s operations:

- Strategic plans;
- Operational/business plans;
- Human resources manuals and policies, such as training guides and lists of trainings conducted, codes of conduct, and safeguarding policies;
- Market research studies;
- Participant satisfaction and exit survey data;
- Impact/Outcomes Assessments;
- Credit policies and manuals;
- Collection policies;
- Board Minutes/Management team meeting notes;
- Product Descriptions;
- Loan contracts; and
- Program/product data and complaints data.

Time Needed: Depending on the depth of the assessment and the internal knowledge of the available documents, resources, and other evidence of adherence to or achievement of the standard, this assessment can take a few hours to several days.

Adaptations Needed:

- This tool is designed to be applicable for any WEE Actor; however, when there are standards that are specific to any entity that provides or facilitates access to financial services, this is noted by the statement “(If financial service provider)” prior to the standard of practice. At the time of designing this tool, the SPTF organization (manager of the Universal Standards) and Cerise organization



(creator of the SPI-4 tool) were undertaking a refresh of the standards and indicators for financial services actors. RICHES tried to align the indicators in this tool with the existing standards and indicators so that any financial service provider completing an assessment could stay aligned with the official SPI assessment. The indicators in this tool that are aligned with the SPI tool are in **red**. Text in **bold black** are suggestions made by the RICHES project that will provide a service provider with a stronger consideration or definition of Do No Harm/unintended consequences, specifically regarding harmful work for children or adults. **A financial services actor undertaking an official SPI assessment should see this tool as supplementary and should focus on the new indicators in bold black, as they are indicators not found in the SPI assessment.**

- The Risks Assessments use the words “program participants” or “participants” to describe a service provider’s beneficiaries or female entrepreneurs. These terms can be modified as appropriate for the type of service provider that will be using the tool. For example, “program participants” or “participants” can be replaced with client, beneficiary, or other meaningful words prior to filling this out.
- All guides and training materials within the **RICHEs Toolkit** have been designed to ensure their accessibility, particularly for differently-abled individuals. For this reason, this tool has been developed in Microsoft Word, using at a minimum 12-point font, and graphics and tables have been labeled with alternative text. You may wish to adjust the sizes of the tables to allow for notetaking or adjust the font size if printing out for your specific use.

Cost Drivers in Use of Tool: Printing costs only. However, these tools can also be used online if a printer is unavailable.

Risks to Consider: No known risks are anticipated that could result in adverse effects for staff or participants. However, given some indicators are written to push gender-responsive practices among WEE Actors, these indicators may initiate difficult conversations among WEE Actor staff, for example, the percent of women among all staff who are in leadership positions.

Languages: English, French, and Spanish.



Social Performance Management Assessment

Name of Organization: _____	Date: _____	Assessment completed by: _____
1. Standards of Practice	2. Evaluation	3. Next Steps
<p>Instructions: Read each dimension and practice.</p> <p>Remember: RICHES tried to align the indicators in this tool with the existing standards and indicators so that any financial service provider completing an assessment could stay aligned with the official SPI assessment. The indicators in this tool that are aligned with the SPI tool are in red. Text in bold black are suggestions made by the RICHES project that will provide a service provider with a stronger consideration or definition of Do No Harm/unintended consequences, specifically regarding harmful work for children or adults. For a non-financial service provider, all indicators should be considered as new.</p>		<p>Under the Next Steps column, describe the specific actions the service provider can take to improve upon a particular practice in the short- or long-term. Guidance and example tools that can help support achievement of the standard are provided in each Dimension that can be deleted as the form is filled out.</p>

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 1: SOCIAL STRATEGY			
Service Provider Strategy			
1	<p>The service provider’s strategy includes a clear articulation of how it will reach and serve women and other marginalized groups (including intersectionality of these groups, i.e., urban/rural women, young/older women, etc.)</p>	<p><i>(Where typically found: gender policy and strategic and/or operational plans)</i></p>	<p><i>(See example Gender Policy Template in Tool 3 found this guide.)</i></p>
2	<p>The service provider’s strategy includes an articulation of social norms (for example,</p>	<p><i>(Where typically found: gender policy and strategic and/or operational plans)</i></p>	<p><i>(See example Gender Policy Template in Tool 3 in this guide.)</i></p>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 1: SOCIAL STRATEGY</i>			
	caretaking) that affect inclusion, participant vulnerability, and economic success.		
3	<p>The service provider defines a “do no harm” strategy that articulates how it will mitigate the social risks connected to the use of its products (and/or through program participation). This strategy should include:</p> <ul style="list-style-type: none"> • Negative effects on participants’ households; • Human rights violations; and • Corruption and bribery. 	<p><i>(Where typically found: safeguarding or participant protection policies, and strategic and/or operational plans)</i></p>	<p><i>(See example Gender Policy Template in Tool 3 and Safeguarding Policy Template in Tool 4, both found in this guide.)</i></p>
Participant Outcomes Data			
4	<p>The service provider collects quantitative and qualitative data, at least annually, that measures both positive and negative changes for participants and their households (for example, unintended consequences of harmful work for children or adults).</p>	<p><i>(Where typically found: market research reports, participant satisfaction surveys and/or reports, and impact reports)</i></p>	<p><i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2 found in this guide, as well as the RICHES M&E Guide, RICHES Market Research Guide, and RICHES Business Diagnostics Guide. See also SPTF Resources on social strategy.)</i></p>
5	<p>The service provider analyzes outcomes, at least annually, for different segments of participants according to their profile and behaviors. Participant profile data includes:</p> <ul style="list-style-type: none"> • Gender; • Age; • Location: urban/rural; • Poverty level/income level; and 	<p><i>(Where typically found: program monitoring data and outcomes data)</i></p>	



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 1: SOCIAL STRATEGY</i>			
	<ul style="list-style-type: none"> Other demographic and socioeconomic characteristics that are relevant to the service provider's social goals (please specify). Participant behavior includes: <ul style="list-style-type: none"> Types of: products and services used; Participation in project activities; and Tenure with service provider. 		
6	The service provider discusses social performance results with employees, at least annually.	<i>(Where typically found: staff meeting notes, SPM and/or monitoring and evaluation—M&E—team meeting notes)</i>	<i>(See SPTF Resources on social strategy.)</i>

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 2: COMMITTED LEADERSHIP</i>			
Representation			
1	At least one board member has direct work experience with the service providers' target participants.	<i>(Where typically found: board minutes or records)</i>	<i>(See example Gender Policy Template in Tool in Tool 3 found in this guide. See also SPTF Resources on Leadership.)</i>
2	At least 20% of board members are women, unless national/local regulations or board policies establish a larger benchmark.		
3	The board includes members whose nationality/ethnicity and gender are representative of the service providers' target participants, unless		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 2: COMMITTED LEADERSHIP</i>			
	<p>national/local regulations or board policies establish a larger benchmark.</p>		
Board and Management Risk Monitoring Practices			
4	<p>The board uses the following data, provided by management, to monitor participant protection/safeguarding⁵:</p> <ul style="list-style-type: none"> • (If financial service provider) Analysis of the risk of participant over-indebtedness; • Analysis of participant dissatisfaction, participant drop-out, results of exit surveys, and participant complaints; • (If financial service provider) Interest rates and whether they are responsible interest rates; • Report on the service provider’s systems for data privacy and security, particularly any failures or breaches; and • Reports on any fraud or corruption, including extortion and bribery. 	<p><i>(Where typically found: board minutes or records)</i></p>	<p><i>(See SPTF Resources on Leadership.)</i></p>
5	<p>The board uses the following data, provided by management, to monitor decent work conditions for employees:</p> <ul style="list-style-type: none"> • Employee turn-over rate by gender, at least annually; and 	<p><i>(Where typically found: board minutes or records)</i></p>	<p><i>(See SPTF Resources on Leadership.)</i></p>

⁵ Participant (client) protection and safeguarding are terms that can be used interchangeably through this tool. In the financial services sector, client protection is the most common term used while safeguarding may be used more by non-profit organizations or government entities.



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 2: COMMITTED LEADERSHIP</i>			
	<ul style="list-style-type: none"> Analysis of employee satisfaction surveys, at least every two years. 		
6	The board uses participant outcomes data, provided by the management, to monitor the service provider’s social strategy, at least annually.	<i>(Where typically found: board minutes or records)</i>	
7	The board takes corrective action when it identifies risks to participants or when the service provider is not achieving its social goals.	<i>(Where typically found: board minutes or records)</i>	
8	Senior management analyzes the following data and assesses risks: <ul style="list-style-type: none"> Analysis of participant protection (safeguarding) risks; Analysis of outcomes for participants and their households (intended and unintended outcomes); and Analysis of decent work conditions. 	<i>(Where typically found: management team meeting notes/reports, complaints mechanism data, monitoring and evaluation data, and do no harm/safeguarding risk assessment reports)</i>	<i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2 and Do No Harm Assessment in Tool 6, all found this guide.)</i>
9	Management takes corrective action when it identifies risks to participants or when the service provider is not achieving its social goals.	<i>(Where typically found: management team meeting notes/reports)</i>	<i>(See SPTF Resources on Product and Service Development.)</i>
10	Internal audit and/or risk management integrates the following criteria into regular monitoring activities: <ul style="list-style-type: none"> (If financial service provider) Participant repayment capacity, loan approval analysis, and prevention of aggressive sales; (If financial service provider) Transparency 	<i>(Where typically found: internal audit/risk management reports, and do no harm/safeguarding risk assessment reports)</i>	<i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2 and Do No Harm Assessment in Tool 6, all found this guide. See also SPTF Resources on Product and</i>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 2: COMMITTED LEADERSHIP			
	<p>of pricing, interest rates, and product descriptions to participants;</p> <ul style="list-style-type: none"> • Compliance with code of conduct; prevention of fraud and corruption; • (If financial service provider) Collateral seizing and appropriate debt collection practices; • Participant data misuse and fraud; and • Complaints handling, including review of a sample of cases. 		<i>Service Development.)</i>

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 3: PARTICIPANT-CENTERED PRODUCTS AND SERVICES			
Participant Research and Data Analysis			
1	<p>Before introducing new products, services, or delivery channels, the service provider conducts market research⁶ that includes gathering the following data about its target participants:</p> <ul style="list-style-type: none"> • Analysis of market share, market saturation, and potential market; • Participant profile data, including gender, age, location (urban/rural), and poverty/income level; and 	<p><i>(Where typically found: market research reports, formative research reports, baseline participant outcomes research reports, participant satisfaction surveys and/or reports, prior project impact reports)</i></p>	<p><i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2, Do No Harm Assessment in Tool 6, both found this guide as well as the RICHES Market Research Guide. See also SPTF Resources on Product and Service Development.)</i></p>

⁶ Alternative terms used for “market research” can be formative research, pre-situational analysis, baseline research.



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 3: PARTICIPANT-CENTERED PRODUCTS AND SERVICES</i>			
	<ul style="list-style-type: none"> Data on participants' needs, goals, and any obstacles (including social norms such as caretaking responsibilities; beliefs about women's roles; past, present, or potential risks experienced, such as those related to traveling or convening to engage with products, services, or programs; engaging household decision-makers; theft, bribery, or extortion; and negative coping mechanisms or experiencing negative consequences) to using products and services/participating in program activities. 		
2	The service provider analyzes product use (types and frequency) / program participation by demographic and socioeconomic segments of its participants.	<i>(Where typically found: market or product use analysis reports, and project reports)</i>	<i>(See SPTF Resources on Product and Service Development.)</i>
3	The service provider conducts participant satisfaction surveys at least every other year.	<i>(Where typically found: participant satisfaction surveys and/or reports, and project impact reports)</i>	<i>(See SPTF Resources on Product and Service Development.)</i>
4	The service provider conducts interviews with dormant and/or exiting participants to look for evidence of product design (or project design) failures.	<i>(Where typically found: participant exit studies, and participant satisfaction surveys and/or reports)</i>	<i>(See example "Unintended Consequences/Negative Coping Mechanisms" Survey Questions in Tool 2 found in this guide, as well as the RICHES Market Research Guide. See also SPTF Resources on Product and Service Development.)</i>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 3: PARTICIPANT-CENTERED PRODUCTS AND SERVICES</i>			
5	The service provider investigates whether stresses at the household level make it more difficult for participants to use its products and services.	<i>(Where typically found: safeguarding/Do No Harm risk assessments, operational or program plans, and participant satisfaction or exit surveys and/or reports)</i>	<i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2 found in this guide, as well as the RICHES Market Research Guide and the RICHES Design Workshop. See also SPTF Resources on Product and Service Development.)</i>
Product / Project Development			
6	The service provider designs new products, services (financial and non-financial), and delivery channels using insights from market and pilot studies, participant feedback, and participant outcomes (positive and negative) data.	<i>(Where typically found: descriptions of products, services and programs, operational plans, and strategic plans)</i>	<i>(See example RICHES Design Workshop. See also SPTF Resources on Product and Service Development.)</i>
7	The service provider modifies its existing products and services in response to participants' needs, feedback, and outcomes.	<i>(Where typically found: product, service, and program descriptions, operational plans, and strategic plans)</i>	<i>(See example RICHES Design Workshop. See also SPTF Resources on Product and Service Development.)</i>
8	The service provider dedicates resources (funds and employee time) for ongoing development and improvement of products, services, and delivery channels.	<i>(Where typically found: operational plans and annual budgets)</i>	<i>(See SPTF Resources on Product and Service Development.)</i>
9	Product, service, delivery channels articulate special provisions for women and / or other marginalized participants, such as increased contact points between frontline-level staff and	<i>(Where typically found: product, service, and program descriptions, operational manuals, code of conduct, and training manuals and/or training schedules)</i>	<i>(See example Gender Policy Template in Tool in Tool 3, Safeguarding Policy Template in Tool 4, both found in this guide. See also SPTF Resources on</i>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 3: PARTICIPANT-CENTERED PRODUCTS AND SERVICES</i>			
	participants, engagement of spouses or other decision-makers, special programs for women, etc.		<i>Product and Service Development.)</i>
10	(If financial service provider) The service provider has a list of assets that cannot be pledged as collateral, which includes items that would create severe hardship or significant loss of income earning ability for the participant.	<i>(Where typically found: product, service, and program descriptions, operational manuals, and credit policies and/or manuals)</i>	<i>(See the SPTF Resources for resources on appropriate collateral and guarantee policies and practices.)</i>
11	(If financial service provider) The service provider accepts alternative forms of collateral from participants whose gender or age creates barriers to access in the local context.	<i>(Where typically found: product, service, and program descriptions, operational manuals, and credit policies and/or manuals)</i>	
12	The service provider provides (or links participants to) a portfolio or comprehensive products and services that help participants respond to economic risk (i.e., emergencies) and support investment in economic activities.		
13	(If financial service provider) The service provider offers products and services for basic needs, such as housing, energy, and education.	<i>(Where typically found: product, service, and program descriptions, Memorandums of Understanding-MOU, and contracts with external service providers)</i>	<i>(See RICHES Financial Services Guide, RICHES Linkages Guide, RICHES Risky Business Curriculum, and RICHES Intra-Household Dialogue Guide.)</i>
14	(If financial service provider) The service provider offers products and services that help participants maintain stable levels of expenditure despite income fluctuation or emergencies, such as: <ul style="list-style-type: none"> • Emergency loans 		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 3: PARTICIPANT-CENTERED PRODUCTS AND SERVICES</i>			
	<ul style="list-style-type: none"> • Savings with an easy withdrawal process • Voluntary insurance • Non-financial services • Loan rescheduling / loan restructuring in times of distress • Linkages to/promotion of cash/asset-based transfers (provided by the government or other community-based organizations) 	<p><i>(Where typically found: product, service, and program descriptions, Memorandums of Understanding-MOU, and contracts with external service providers)</i></p>	<p><i>(See RICHES Financial Services Guide, RICHES Linkages Guide, RICHES Risky Business Curriculum, and RICHES Intra-Household Dialogue Guide.)</i></p>
15	<p>(If financial service provider) The service provider offers training to participants in areas where they have skill gaps that prevent them from achieving their goals.</p>		
16	<p>(If financial service provider) The service provider offers products/services that enable participants to invest in economic opportunities such as business loans for start-up, working capital, and investment.</p>		
17	<p>(If financial service provider) The service provider offers products/services for major life events such as weddings, maternity care/childbirth, housing, higher education, and funerals.</p>		
Risk Mitigation			
18	<p>If the participant business is related to sectors known</p>	<p><i>(Where typically found: operational</i></p>	<p><i>(See RICHES Risk Assessments and</i></p>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 3: PARTICIPANT-CENTERED PRODUCTS AND SERVICES			
	to have high social risks (such as risks to harmful work for children and adults), the service provider conducts additional due diligence to mitigate risk.	manuals, safeguarding policies, and credit manuals)	RICHES Business Diagnostics Guide . See also United States Department of Labor (USDOL) “ Sweat and Toil ” application, as it is a helpful resource for identifying which goods/sector have been identified as having risks for harmful work for children or adults.)

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 4: PARTICIPANT PROTECTION			
Code of Conduct			
1	<p>The service provider's policies prohibit the following:</p> <ul style="list-style-type: none"> Corruption, theft, kickbacks, fraud; Participant intimidation using abusive language or physical force, limiting physical freedom, sexual harassment, shouting at or threatening the participant, entering the participant’s home uninvited, and publicly humiliating the participant; and Discrimination against Protected Categories.⁷ <p>[Note: Protected Categories are as follows:</p>	(Where typically found: code of conduct, safeguarding policies, whistleblower policies, complaints reports, and internal audits)	(See example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4 and Code of Conduct Template found in Tool 5, all found this guide. See SPTF Resources on Codes of Conduct .)

⁷ Protected Categories are those established or agreed upon by International Labor Organization Conventions, such as Convention 111 which focuses on Discrimination in Employment and Occupation. For more information on protected categories, see ILO. “[Business, Non-discrimination and Equality](#).”



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 4: PARTICIPANT PROTECTION			
	<p>People over 40 years old; Sex; Race/ethnicity/national extraction/social origin /caste; Religion; Health status, including HIV status; Disability; Sexual orientation; Political affiliation/opinion; Civil/marital status; and Participation in a trade union.]</p>		
2	<p>The service provider informs participants, verbally or in writing, about the prohibited behaviors found in the code of conduct.</p>	<p><i>(Where typically found: code of conduct, internal controls/monitoring or operational manuals, and training manuals)</i></p>	<p><i>(See example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4 and Code of Conduct Template found in Tool 5, all found this guide. See SPTF Resources on Codes of Conduct.)</i></p>
3	<p>If the service provider plans to partner with a third party, it reviews the third party's code of conduct prior to signing a contract to check for commitment to fair and respectful treatment of participants.</p>	<p><i>(Where typically found: MOUs, and partner/contractor/volunteer code of conduct templates)</i></p>	
(For Financial Service Providers) Aggressive Sales and Collections			
4	<p>(If financial service provider) The service provider conducts a cash flow analysis that considers income, expenses and debt service related to business and family, and any other sources of revenue, including informal sources.</p>	<p><i>(Where typically found: operational manuals, credit manuals, and internal audits)</i></p>	<p><i>(See the SPTF resources for resources on appropriate collateral and guarantee policies and practices.)</i></p>
5	<p>(If financial service provider) The service provider has internal controls to monitor whether employees are engaging in aggressive sales.</p>	<p><i>(Where typically found: code of conduct, internal controls/monitoring or operational manuals, and performance reviews.)</i></p>	
6	<p>(If financial service provider) The service provider's</p>	<p><i>(Where typically found: human</i></p>	



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 4: PARTICIPANT PROTECTION</i>			
	incentive structure does not promote aggressive sales.	<i>resources-HR, Employee contracts, and Performance Reviews)</i>	
7	<p>(If financial service provider) The service provider's collections policy includes the following:</p> <ul style="list-style-type: none"> • A list of appropriate and inappropriate debt collections practices, including collateral seizing practices; • A schedule for the collections process that allows time for the debt collector to determine the reasons for a participant’s default and for the participant to find solutions; • The service provider informs the participant prior to seizure of collateral, allowing the participant to attempt to remedy the default; and • A prohibition on sales of the participants' collateral to the service provider, the staff of the service provider, to their relatives, or to third parties involved in the seizing process. 	<p><i>(Where typically found: collections policy and code of conduct or operational manuals)</i></p>	<p><i>(See the SPTF resources for resources on appropriate collateral and guarantee policies and practices.)</i></p>
8	<p>(If financial service provider) The service provider restructures or writes off loans on exception, based on a pre-determined list of cases of specific distress.</p>	<p><i>(Where typically found: collections policy, refinancing policy, or operational manuals)</i></p>	<p><i>(See the SPTF resources for resources on refinancing.)</i></p>
Data Security			
9	The service provider conducts a risk assessment to identify the data-related risks to participants at least		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 4: PARTICIPANT PROTECTION</i>			
	once every two years.		
10	If the service provider works with third parties that have access to participant data, the service provider's agreements specify that third parties will maintain the security and confidentiality of participant data.		
11	The service provider explains to participants how it will use participant data, with whom it will share the data, and how third parties will use the data. The service provider receives participants' consent before using or sharing their data.		
12	<p>Information about data use and consent is easy for participants to understand:</p> <ul style="list-style-type: none"> • When requesting consent from participants to use their data, the service provider explains in simple, local language, either in writing or orally, how it will use the data. <i>Internet links to disclosure statements are not sufficient.</i> • (If financial service provider) The service provider trains participants on the importance of protecting their personal information including Personal Identification Numbers (PINs), savings account balances, and information on repayment problems. • The service provider gives participants the right to withdraw their permission to use data 		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 4: PARTICIPANT PROTECTION</i>			
	and explains any consequences of withdrawal.		
13	The service provider notifies participants of their right to review and correct their personal and financial data.	<i>(Where typically found: data privacy or use policy, and contracts or agreements with participants)</i>	<i>(See Do No Harm Assessment in Tool 6 found in this guide, as well as see SPTF resources on data privacy and use.)</i>
Participant Grievance Mechanism			
14	Participants have a way to submit complaints to persons other than their community agent/loan officer/program or product officer.		
15	The service provider has at least two complaints channels that are free of charge and accessible to participants.		
16	The service provider informs participants how to submit a complaint (including the types of complaints or concerns that customers can report, such as sexual harassment, negative consequences of product use/program participation such as pulling children out of school or reducing food consumption).	<i>(Where typically found: whistleblower policies, safeguarding policy, complaints mechanism documentation such as that found in human resources training manuals for employees on complaints mechanism and training schedules)</i>	<i>(See SPTF resources on complaints mechanisms.)</i>
17	The service provider's complaints policy identifies levels of severity and requires that severe complaints are escalated immediately to senior management.		
18	The service provider's complaints mechanism ensures		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 4: PARTICIPANT PROTECTION			
	that all formal complaints are registered in a secure system that reaches the complaints handling staff and/or management.		
19	The service provider resolves participant complaints quickly (within a month of original submission). If the resolution takes longer than one month, the provider notifies the participant of the reason for the delay.		<i>(See SPTF resources on complaints mechanisms.)</i>
20	Management reviews complaints reports and key performance indicators (e.g., average time to resolve and percent resolved) and takes corrective action to resolve systematic problems leading to complaints, at least once annually.	<i>(Where typically found: safeguarding policy, and management meeting notes)</i>	
21	If the service provider partners with third parties, the service provider helps its participants to resolve complaints they have with those third parties.	<i>(Where typically found: safeguarding policy, management meeting notes, and partner/program notes)</i>	

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT			
Hiring and Recruitment			
1	The service provider assesses each candidate's work and personal experience related to the service provider's target participants.	<i>(Where typically found: Job descriptions)</i>	
2	The service provider assesses each candidate's motivation to achieve the service provider's social	<i>(Where typically found: Job descriptions and hiring practices and policies)</i>	



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
	goals.		
3	The service provider's non-discrimination policy towards employees covers all internationally recognized "Protected Categories." [Note: Protected Categories are as follows: People over 40 years old; Sex; Race/ethnicity/national extraction/social origin /caste; Religion; Health status, including HIV status; Disability; Sexual orientation; Political affiliation/opinion; Civil/marital status; and Participation in a trade union.]	<i>(Where typically found: Anti-discrimination or harassment policies, code of conduct, and safeguarding policies)</i>	<i>(See example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4, and Code of Conduct Template in Tool 5, all found in this guide. See also SPTF Resources on HR development.)</i>
4	The service provider analyzes employee data by gender and job position to ensure that men and women are equally represented at different levels of the organization.	<i>(Where typically found: HR reports and staffing records)</i>	
5	The service provider operates in accordance with national law on forced labor and minimum age for employment, but in no case employs workers under 14 years old. If national law does not address forced labor, the service provider complies with international law.	<i>(Where typically found: HR reports and staffing records)</i>	
Workplace Norms and Practices			
6	The service provider's Human Resource (HR) policy explains employees' rights and responsibilities related to the following: <ul style="list-style-type: none"> • Work rules and disciplinary procedures; 		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
	<ul style="list-style-type: none"> • Grievance resolution; • Freedom of association and provision of collective bargaining agreements; • Whistle blower safeguards; • Anti-harassment safeguards; and • Conditions for dismissal and exit formalities. 		
7	<p>The service provider has a clearly articulated policy and plan for preventing and responding to harassment and violence.</p> <ul style="list-style-type: none"> • The policy has a statement of zero tolerance highlighting the service provider’s commitment to eliminating all forms of violence and harassment at work, not limited to sexual harassment. • The policy is clearly articulated to workers and managers through trainings, handbooks, and other means accessible to workers. 	<p><i>(Where typically found: HRs policies, anti-discrimination or harassment policies, code of conduct, and safeguarding policies)</i></p>	<p><i>(See example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4 and Code of Conduct Template found in Tool 5, all found this guide. See also SPTF Resources on HR development.)</i></p>
8	<p>The code of conduct (or equivalent) clearly spells out organizational values, standards of professional conduct and treatment of participants (inclusive of sexual harassment or inappropriate behavior with adults and children) that are expected of all service providers or third-party provider staff or agents. Policies also spell out what sanctions to apply in case of a breach of the code of conduct.</p>	<p><i>(Where typically found: code of conduct and safeguarding policies)</i></p>	



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
9	All employees sign a document acknowledging that they will abide by the Code of Conduct.	<i>(Where typically found: code of conduct and HR policies and records)</i>	
10	The service provider analyzes salary data to ensure that men and women receive equal pay for equal work and have equal opportunities for promotion.	<i>(Where typically found: HR policies or manuals)</i>	
Workplace Health and Safety Risks			
11	The service provider assesses, at least annually, the health and safety risks (including violence experienced at home or outside of work) faced by its employees and audits its existing safety measures.	<i>(Where typically found: HR reports, internal monitoring reports, and risk assessment reports)</i>	<i>(See SPTF Resources on HR development.)</i>
12	The service provider documents and reports to management, at least annually, all occupational accidents, injuries, and illnesses. The results are disaggregated by gender and position.		
13	<p>The service provider takes necessary measures to mitigate hazards.</p> <ul style="list-style-type: none"> • The service provider offers health and safety equipment, training, and adapted physical accommodations. • The service provider has an emergency/disaster response plan and trains management and employees, at least annually, on how to follow the plan. • The service provider compensates employees 	<i>(Where typically found: safeguarding policies, risk assessments, and emergency preparedness plans)</i>	<i>(See SPTF Resources on HR development.)</i>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
	who miss work due to work-related injuries.		
Training and Professional Development			
14	Men and women receive equal opportunities for training and skill development.	<i>(Where typically found: HR reports and staffing records)</i>	<i>(See SPTF Resources on HR development.)</i>
15	The service provider trains all employees on its social goals and how their work contributes to achieving these goals and reinforces this on an ongoing basis.	<i>(Where typically found: training manuals and training schedules)</i>	
16	<p>The service provider trains employees on participant protection, in line with their roles and responsibilities. The training covers at minimum the following topics:</p> <ul style="list-style-type: none"> • (If financial service provider) Repayment capacity analysis and the credit approval process; • (If financial service provider) How to avoid aggressive sales techniques, including how to respect participants' right to refuse products; 	<i>(Where typically found: Training manuals, training schedules, code of conduct, and product, program, and service design documents)</i>	<i>(See Introduction to RICHES Understanding Harmful Work Training. See also SPTF Resources on HR development.)</i>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
	<ul style="list-style-type: none"> • (If financial service provider) How to explain pricing, terms, and conditions to participants and how to verify participant understanding; • (If financial service provider) Debt collection practices and loan recovery procedures; • (If financial service provider) The negative coping mechanisms that debt recovery practices can promote, such as the use of harmful child work, domestic violence, etc.; • Confidentiality and data sharing policies and fraud risks, including common frauds, fraud identification, and fraud reporting; and • How the complaints mechanism works, how to resolve complaints against third party service providers, and how to treat participants respectfully during the process. 		
17	Employees receive training on gender sensitivity, inclusivity, and harassment and violence.		
Employee Grievance Mechanism			
18	The service provider has a formal grievance mechanism that allows employees to raise workplace concerns in a confidential manner.	<i>(Where typically found: code of conduct, safeguarding policies, whistleblower policies, complaints reports, and internal audits)</i>	<i>(For this entire Dimension, see example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4 and Code of Conduct Template found in Tool 5, all found this guide. See also SPTF Resources</i>
19	The service provider has more than one grievance process that encourages the use of both formal and	<i>(Where typically found: code of conduct, safeguarding policies, whistleblower</i>	



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
	informal grievance mechanisms, as well as external grievance channels, if necessary.	<i>policies, complaints reports, and internal audits)</i>	<i>on HR development.)</i>
20	Staff appointed to reviewing grievance mechanisms receive regular trainings on how to conduct investigations and interviews related to harassment claims that ensure accessibility, impartiality, and confidentiality.		
Employee Satisfaction			
21	<p>The service provider surveys employees, at least annually, on satisfaction and concerns with employment conditions. For example:</p> <ul style="list-style-type: none"> The service provider asks employees for feedback on at least the following topics: workload; work schedule; compensation and benefits; professional development opportunities; communication, participation and leadership from supervisors; and discrimination based on gender and other protected categories (including treatment by leaders and other staff, and perception of workplace equality such as payment, treatment, and opportunities for advancement). The service provider disaggregates survey results by gender, position, and any other 	<i>(Where typically found: employee satisfaction surveys/reports)</i>	<i>(See also SPTF Resources on HR development.)</i>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT			
	<p>relevant categories.</p> <ul style="list-style-type: none"> The service provider shares the survey results with employees. The service provider gives all outgoing employees the opportunity for an exit survey or interview. 		
Employee Performance Reviews and Incentives			
22	<p>The performance evaluation includes:</p> <ul style="list-style-type: none"> Participant protection criteria, such as portfolio quality and customer service, including treating participants respectfully and without discrimination. Social performance criteria, such as ability to recruit target participants, quality of data collection, quality of non-financial services provided, and participant retention. 	<p><i>(Where typically found: HR records and performance review templates)</i></p>	<p><i>(See SPTF Resources on HR development.)</i></p>
23	<p>The service provider reviews incentive schemes to check for negative consequences such as fraud, customer mistreatment, aggressive sales, over-indebtedness, or high employee turnover.</p>	<p><i>(Where typically found: HR records and management team meeting notes)</i></p>	

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 6: RESPONSIBLE GROWTH AND RETURNS (Primarily for Financial Service Providers)			
Revenue and/or Growth in Participant Outreach			



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 6: RESPONSIBLE GROWTH AND RETURNS (Primarily for Financial Service Providers)</i>			
1	<p>The service provider monitors the following data, at least monthly, during times of revenue and participant growth:</p> <ul style="list-style-type: none"> • Outreach indicators, including: <ul style="list-style-type: none"> ○ (For financial service providers) Average loan size of new participants; and ○ Share of new participants who are from the service provider's target group. • Quality of service indicators segmented by branch, including: <ul style="list-style-type: none"> ○ (For financial service providers) Portfolio at risk; and ○ Number of complaints. • Human resource capacity indicators, including participants per field officer, ratio of internal audit staff to total number of staff, hours of training for new employees (by position), and employee turnover (by position). 	<p><i>(Where typically found: Regular monitoring reports)</i></p>	<p><i>(See SPTF Resources on Responsible Growth and Returns.)</i></p>
2	<p>When the service provider identifies growth that is harmful to participants, it takes mitigating action such as:</p> <ul style="list-style-type: none"> • Reducing growth targets; and • (For financial service providers) Applying more conservative loan approval criteria or limiting the total number of loans an 	<p><i>(Where typically found: Regular monitoring reports and management meeting notes)</i></p>	<p><i>(See SPTF Resources on Responsible Growth and Returns.)</i></p>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 6: RESPONSIBLE GROWTH AND RETURNS (Primarily for Financial Service Providers)</i>			
	individual can have at one time.		
Investment and Disclosure to Stakeholders			
3	The service provider discusses its social goals with potential equity investors and asks about their planned timeframe for investment and exit strategies to assess alignment on social strategy.	(Where typically found: Investor agreements)	(See SPTF Resources on Responsible Growth and Returns.)
4	The board of directors prioritizes accepting investment offers from investors whose investment strategy is aligned with the service provider's social strategy.		
5	The service provider discloses the results of its social audits and outcomes measurement to all stakeholders, upon request.	(Where typically found: Regular monitoring reports, social performance management reports, outcomes or impact reports, and risk assessment reports)	(See SPTF Resources on Responsible Growth and Returns.)



Phase 2: Build the Structure

Tool 2: Example ‘Unintended Consequences/Negative Coping Mechanisms’ Survey Questions

Process Description: This tool proposes a list of questions that can be added to a participant satisfaction, exit, or outcomes survey to measure and monitor whether a participant is resorting to harmful coping mechanisms or experiencing the unintended consequences of WEE programming. The survey questions can be selected as a whole or based on the needs of the assessment. Each set of questions falls into one of four categories:

1. Negative coping mechanisms as a result of an economic shock;
2. Unintended consequences as a result of using a specific financial service;
3. Experiences with a service provider (with emphasis on harassment, abuse of power, or mistreatment); or
4. Financial stress.

Sampling methodologies and sample sizes are not recommended in this tool as it is assumed these will be left up to WEE Actor’s teams and/or research teams. A WEE Actor should conduct interviews using these questions at least once a year or more frequently among a sample of program participants. A WEE Actor is advised to use a third-party entity to administer the questions given their sensitive nature or to rely on an internal team that has limited contact with participants, such as an internal controls or program quality team.

When used with simple sampling methods, such as [Lot Quality Assurance Sampling](#), this instrument can serve as a cost-effective means to understand short-term impacts of the education sessions. WEE Actor monitoring and evaluation teams and frontline-level staff can conduct the survey as well. If using paper surveys, Freedom from Hunger designed a simple [Client Outcomes Performance](#) indicator tool to assist with inputting and analyzing simple participant monitoring data.

Please see the Impact Survey Instrument located in the [RICHS M&E Guide](#) for an example survey structure.

Materials Needed: Paper for printing if using paper surveys or digital data collection tools, such as TaroWorks, ODK, or SurveyCTO that can be used with tablets or mobile phones.

Time Needed: It will take approximately 25 minutes to conduct the survey questions if all the questions are used.

Cost Drivers in Use of Tool: Cost drivers are staff time to conduct the tool if service provider staff are used, travel, data analysis, and report-writing. Alternatively, if a data collection firm is used, contractual costs should be considered.

Risks to Consider: Asking participants about negative coping mechanisms can be a sensitive issue. It will be important that facilitators are well-trained and sensitized to the difficult experiences that participants have had.



Adaptations:

- Recall periods for the questions can be adapted based on a WEE Actor’s interest in comparing different time periods. A period of six months has been set in the questions below. No more than a one-year recall period is advised. Where these adaptations are needed, these are noted with brackets “[SPECIFY TIME PERIOD, ex. PAST 6 MONTHS].”
- Where other survey questions adaptations are anticipated, they are also noted in ALL CAPS and with brackets [...]. In most cases, the adaptations needed are the name of the service provider, the specific product/service being referenced, and how the WEE Actor references its participants. Currently the term “Participant” or “Participants” is used, but it can be replaced by words such as clients, beneficiaries, or using other relevant terms.

Languages: English, French, and Spanish.



Survey Questions

Note: Instructions for conducting the survey are provided in italics and should not be read out loud.

Questions	Answer Options
Negative Coping Mechanisms	
<p>1. Did your household experience any of the following financial shocks in the [SPECIFY TIME PERIOD, ex. PAST 6 MONTHS]?</p> <p><i>(Read all options. Circle all that apply.)</i></p>	<ol style="list-style-type: none"> 1. Illness of income earner (including respondent) 2. Illness of children 3. Illness of other family member 4. Death in family 5. Loss of livestock 6. Poor harvest 7. Theft 8. Business failure/loss of income source 9. Significant home repair 10. Other shock (specify) _____ 11. Other shock (specify) _____ 12. No shock experience → <i>Skip to Question 3.</i>
<p>2. If yes to any of the shocks mentioned above, did your household do or experience any of the following?</p> <p><i>(Read all options. Circle all that apply.)</i></p>	<ol style="list-style-type: none"> 1. Used savings 2. Took a loan 3. Used remittances (domestic or international) 4. Used insurance 5. Sought support from or used government or non-governmental organization social protection schemes, such as cash transfer programs 6. Reduced air-time top-ups 7. Reduced the quantity or quality of food in your family 8. Worked more than normal, overtime, additional jobs, on weekends or when sick 9. Delayed major expenses such as health, home improvement or buying a business asset 10. Sold or pawned assets such as jewelry, appliances, or animals 11. Used the financial support of family or friends 12. A bank or microfinance company seized any asset or guarantee from you 13. Suffered from embarrassment, insults, or gossip 14. Pulled children out of school or reduced their attendance/participation in school to reduce education costs 15. Pulled children out of school or reduced their attendance/participation in school to assist a parent with income generation (either supporting a household activity or income generation of their own) 16. Increased the hours children worked to earn income or support household chores or caretaking to allow parents to work



Questions	Answer Options
	<ul style="list-style-type: none"> 17. Sent children to eat at others’ homes or to be supported by other guardians 18. Sent children to work in others’ homes or businesses 19. Had to beg for financial help from others 20. Argued with a spouse on how to respond to the shock 21. Experienced violence from family members or others (including any form of physical, verbal, emotional, sexual, or financial violence) 22. Other (specify) _____ 23. Other (specify) _____ 24. No response/none of the above
Unintended Consequences	
<p>3. In the [SPECIFY TIME PERIOD, ex. PAST 6 MONTHS], has your household had to do any of the following or have you experienced any of the following in order to make a loan payment?</p> <p><i>(Read all options. Circle all that apply.)</i></p>	<ul style="list-style-type: none"> 1. Used savings 2. Took out another loan to repay a current one 3. Used remittances (domestic or international) 4. Used insurance 5. Sought support from or used government or non-governmental organization social protection schemes, such as cash transfer programs 6. Reduced air-time top-ups 7. Reduced the quantity or quality of food in your family 8. Worked more than normal, overtime, additional jobs, on weekends or when sick 9. Delayed major expenses such as health, home improvement or buying a business asset 10. Sold or pawned assets such as jewelry, appliances, or animals 11. Used the financial support of family or friends 12. A bank or microfinance company seized any asset or guarantee from you 13. Suffered from embarrassment, insults or gossip 14. Pulled children out of school or reduced their attendance/participation in school to reduce education costs 15. Pulled children out of school or reduced their attendance/participation in school to assist a parent with income generation (either supporting a household activity or income generation of their own) 16. Increased the hours children worked to earn income or support household chores or caretaking to allow parents to work 17. Sent children to eat at others’ homes or to be supported by other guardians 18. Sent children to work in others’ homes or businesses 19. Had to beg for financial help from others



Questions	Answer Options
	20. Argued with a spouse on how to make a loan payment 21. Experienced violence from family members or others (including any form of physical, verbal, emotional, sexual, or financial violence) 22. Other (specify) _____ 23. Other (specify) _____ 24. No response/none of the above
4. In the [SPECIFY TIME PERIOD, ex. PAST 6 MONTHS], has your household had to do any of the following or have you experienced any of the following in order to make a savings contribution (for a commitment savings product or with a savings group)? <i>(Read all options. Circle all that apply.)</i>	1. Took a loan 2. Used remittances (domestic or international) 3. Reduced the quantity or quality of food in your family 4. Worked more than normal, overtime, additional jobs, on weekends or when sick 5. Delayed major expenses such as health, home improvement or buying a business asset 6. Reduced air-time top-ups 7. Sold or pawned assets such as jewelry, appliances, or animals 8. Used the financial support of family or friends 9. Suffered from embarrassment, insults or gossip 10. Pulled children out of school or reduced their attendance/participation in school to reduce education costs 11. Pulled children out of school or reduced their attendance/participation in school to assist a parent with income generation (either supporting a household activity or income generation of their own) 12. Increased the hours children worked to earn income or support household chores or caretaking to allow parents to work 13. Sent children to eat at others' homes or to be supported by other guardians 14. Sent children to work in others' homes or businesses 15. Had to beg for financial help from others 16. Argued with a spouse on how to make a savings contribution 17. Experienced violence from family members or others (including any form of physical, verbal, emotional, sexual, or financial violence) 18. Other (specify) _____ 19. Other (specify) _____ 20. No response/none of the above
5. In the [SPECIFY TIME PERIOD, ex. PAST 6 MONTHS], has your household had to do any of the following or have you experienced any of	1. Took a loan 2. Used remittances (domestic or international) 3. Reduced the quantity or quality of food in your family 4. Worked more than normal, overtime, additional jobs, on weekends or when sick



Questions	Answer Options
<p>the following to make an insurance payment?</p> <p><i>(Read all options. Circle all that apply.)</i></p>	<ol style="list-style-type: none"> 5. Delayed major expenses such as health, home improvement or buying a business asset 6. Reduced air-time top-ups 7. Sold or pawned assets such as jewelry, appliances, or animals 8. Used the financial support of family or friends 9. Suffered from embarrassment, insults or gossip 10. Pulled children out of school or reduced their attendance/participation in school to reduce education costs 11. Pulled children out of school or reduced their attendance/participation in school to assist a parent with income generation (either supporting a household activity or income generation of their own) 12. Increased the hours children worked to earn income or support household chores or caretaking to allow parents to work 13. Sent children to eat at others' homes or to be supported by other guardians 14. Sent children to work in others' homes or businesses 15. Had to beg or ask for financial help from others 16. Argued with a spouse on how to make a savings contribution 17. Experienced violence from family members or others (including any form of physical, verbal, emotional, sexual, or financial violence) 18. Other (specify) _____ 19. Other (specify) _____ 20. No response/none of the above

Questions	Acceptability	Frequency
Unacceptable Sacrifices		
<p>6. I am going to list a series of strategies a business owner may or may not use to either start, manage, or grow a business. You will be asked your opinion on how acceptable the strategy is to you and then the frequency in which you use the strategy.</p> <p><i>(Note: Since questions may appear repetitive, the words in bold font are how to identify the difference from one question to the next. You may need to emphasize these words when asking the question.)</i></p>	<p>Please indicate on a scale of 1 to 4 how acceptable the strategy is to you. (1 is Very acceptable, 2 is Acceptable, 3 is Not very acceptable, and 4 is Not acceptable at all.)</p>	<p>How often have you had to use this strategy in the [SPECIFY TIME PERIOD, ex. PAST 6 MONTHS]? Please indicate on a scale of 1 to 5 how often you had to use this strategy, where 1 is Never in the last year, 2 is Once in the last year, 3 is A few times, and 4 is Very often in the last year.</p>
<p>A. Asking older children (ages 15-18) to support the business before or after</p>	<ol style="list-style-type: none"> 1. Very Acceptable 2. Acceptable 	<ol style="list-style-type: none"> 1. Never 2. Once



Questions	Acceptability	Frequency
Unacceptable Sacrifices		
school or on the weekends and holidays	3. Not very acceptable 4. Not acceptable at all	3. A few times 4. Very often
B. Asking older children (ages 15-18) to care for others or take over your chores at home before or after school or on the weekends and holidays	1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all	1. Never 2. Once 3. A few times 4. Very often
C. Asking older children (ages 15-18) to support the business, care for others, or take over your chores at home during school hours	1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all	1. Never 2. Once 3. A few times 4. Very often
D. Asking younger children (14 and younger) to support the business before or after school or on the weekends and holidays	1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all	1. Never 2. Once 3. A few times 4. Very often
E. Asking younger children (14 and younger) to care for others or take over your chores at home before or after school or on the weekends and holidays	1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all	1. Never 2. Once 3. A few times 4. Very often
F. Asking younger children (14 and younger) to support the business, care for others, or take over your chores at home during school hours	1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all	1. Never 2. Once 3. A few times 4. Very often

Questions	Answer Options
Experience with Service Provider	
7. Do you feel treated with respect from [NAME OF SERVICE PROVIDER]?	1. Yes 2. No
8. Have you ever felt like you were treated “differently” (for example, mistreated, slighted, ignored) by [NAME OF SERVICE PROVIDER] due to your sex and/or other characteristics, including race, disability, national origin, or others?	1. Yes 2. No
9. Have you ever felt threatened (for example, made you afraid of retribution such as withholding a service or loan) by a representative from [NAME OF SERVICE PROVIDER]?	1. Yes 2. No
10. Have you ever been asked to pay for a bribe from a representative from [NAME OF SERVICE PROVIDER]?	1. Yes 2. No



Questions	Answer Options
11. Have you ever faced unwanted attempts to establish a romantic or sexual relationship with you despite your efforts to discourage it from a representative from [NAME OF SERVICE PROVIDER]?	<ol style="list-style-type: none"> 1. Yes 2. No
12. If you have a grievance or complaint about services provided by [NAME OF SERVICE PROVIDER], do you know what to do to file a complaint with or about [NAME OF SERVICE PROVIDER]?	<ol style="list-style-type: none"> 1. Yes 2. No
13. Have you ever filed a complaint with or about [NAME OF SERVICE PROVIDER]?	<ol style="list-style-type: none"> 1. Yes 2. No
14. When you filed the complaint or provided input, did you find the processes easy to follow?	<ol style="list-style-type: none"> 3. Yes 4. No 5. Don't know 6. Not applicable
15. How satisfied are you with how the complaint was resolved?	<ol style="list-style-type: none"> 1. Very satisfied 2. Somewhat satisfied 3. Not satisfied at all 4. Complaint was not resolved
<p>Financial Stress</p> <p><i>(Note: The questions in this section are designed to let your organization select which financial product is being referenced. Like the questions above regarding coping with use of different financial products, questions 16 and 17 could be repeated for each individual product, if desired.)</i></p>	
16. How much time did you spend over the last 24 hours thinking about [SELECT: paying your next loan installment, making your next savings contributions, making an insurance payment, or making a bill payment]?	<ol style="list-style-type: none"> 1. All day 2. More than one hour 3. Less than 1 hour 4. No time
17. Do you currently feel worried, tense, or anxious about [SELECT: paying your next loan installment, making your next savings contributions, making an insurance payment, or making a bill payment]?	<ol style="list-style-type: none"> 1. Yes, a little worried, anxious or tense 2. Yes, very worried, anxious, or tense 3. No
18. Did you argue with your spouse over finances today?	<ol style="list-style-type: none"> 1. Yes 2. No
19. "How stressed do you feel about your personal finances?" Score from 1-10, where 1 represents low financial stress and 10 represents high financial stress.	<ol style="list-style-type: none"> 1 Very little stress 2 3 4 5 Somewhat stressed 6 7 8



Questions	Answer Options
	9 10 Very stressed
18. In the last 12 months, how often were you afraid of your husband/partner? Never, some of the time, most of the time?	1. Never 2. Some of the time 3. Most of the time



Tool 3: Gender Policy Template

Process Description: This tool seeks to provide example language of how a WEE Actor could demonstrate its commitment to gender equity and equality and WEE. While the RICHES Toolkit seeks to fill gaps in policies and practices related to harmful work for children and adults for WEE Actors, a key tenet is that WEE Actors have a commitment to WEE, and therefore policies and practices to support WEE.

This Gender Policy Template is based off Grameen Foundation’s Gender Policy and was guided by Grameen’s interpretation of the Minimum Standards for Mainstreaming Gender Equality as defined by [The Gender Practitioners Collaborative](#). It is expected a WEE Actor can revise all or pieces of this policy or use it for inspiration.

Materials Needed: To adapt this policy, other organizational policies should be ready to cross-reference and potentially update.

Steps:

- **Step 1:** Review the language in this policy and compare it to your existing organizational policies.
- **Step 2:** Based on the **Adaptations Needed** as described below, replace the words written in CAPS and put in brackets ‘[...]’ with your own organizational information. Alternatively, you can consult your existing policies to determine whether adding missing information, such as information on child protection or labor protection, should be added to your existing policy.
- **Step 3:** Update any related policies whose language should also change, such as a Code of Conduct or Human Resources Manual.
- **Step 4:** Follow internal procedures for policy approvals.
- **Step 5:** While not provided with this policy, the development of an internal process and procedural manual will be needed to provide specific guidance on how to implement the policy. For example, the development of a safeguarding team, revising or activating the complaints mechanism, etc. will need to be explained so that employees understand how to raise or respond to concerns about adherence to the policy.
- **Step 5:** Share policy and related revised policies and procedure manuals with employees using existing processes. If no process exists, it will be important to raise awareness and train employees on the concept of gender and the relevance of this policy to their jobs.
- **Step 6:** If relevant, share policy with external stakeholders, for example implementing partners or contractors.

Time Needed: This policy template will only take 5-10 minutes to review. However, adapting it verbatim will take significantly longer, depending on how you need to adapt it and adopt it by your leadership.

Adaptations Needed: This tool has been designed such that a service provider can put their name into the policy, along with articulation of their mission and specific service provider information, objectives, goals, etc. Where the policy can be adapted is noted with ALL CAPS and brackets ‘[...]’. Most adaptations required are references to internal policies, entering the name of the WEE Actor (in this example, reference is made to Service Provider), how the WEE Actor references its primary beneficiaries (in this example, reference is made to Participant or Participants, but it can be replaced by words such as clients, beneficiaries, or using other relevant terms) as well as its stakeholders, and contacts for complaints or other internal support mechanisms for employees.



Cost Drivers of the Tool: The primary cost driver from the use of this tool is staff time to review and make adaptations to the template for organizational use.

Risks to Consider: The primary risk to any policy is that the policy is approved but not adequately implemented. Adoption of the policy requires consideration and planning of processes and procedures that will need to be created and how to train employees to ensure they understand the objectives of the policy and the key role that each person plays. In other words, they need to understand the implications of the policy and possible ingrained cultural shifts that need to be addressed. A plan for training, building awareness, and supporting the implementation of the policy will be critical to its successful influence over the organizational practices.

Languages: English, French, and Spanish.



Gender Policy Template

Introduction/Purpose

[NAME OF SERVICE PROVIDER AND MISSION]. We recognize that women and girls have disproportionately low access to resources, tools, and information, due to their gender, which can be compounded by other intersectional identities, such as their race, religion, age, marital status, and economic status, among many other identities. We seek to ensure that obstacles to women’s access to resources, tools and information are overcome and are a key component to all the work we do.

This policy articulates the importance of our commitment to gender equity and equality and women’s empowerment to achieve our mission. To this end, we will promote and implement gender mainstreaming throughout our work. This policy has three purposes.

1. To communicate our commitment to gender equity and equality to achieve our mission.
2. To establish principles and standards to ensure gender equity and equality are addressed in our programs, operations, and culture.
3. To provide guidance for implementing our gender policy.

Rationale

We believe that gender mainstreaming is vital to achieve our mission to [RESTATE MISSION]. Significant barriers must be overcome to ensure both women and men, and girls and boys, have equal access to opportunities, information and resources so they have equal power to make choices that will improve their lives and their communities. [NAME OF SERVICE PROVIDER] is also committed to the 2030 UN Sustainable Development Goal on gender which states, “Achieve gender equality and empower all women and girls.” Studies also demonstrate that increases in equality for women and girls can have significant impacts on economic and social development. Because of this, [NAME OF SERVICE PROVIDER] programs will integrate approaches towards increasing the empowerment of women and girls to overcome the constraints they face to economic productivity, financial inclusion, access to health and nutrition, and building resilience. We recognize that men and boys play a critical role and must be actively involved in overcoming gender barriers.

Our policy incorporates principles of inclusivity, commitment, teamwork, and accountability. We believe our programs, partnerships and operations will be more impactful and effective with the full integration of gender considerations into our strategies and approaches.

[NAME OF SERVICE PROVIDER] believes that it is essential to clearly articulate and hold ourselves accountable for gender-specific goals and targets if we are to translate our intentions into concrete outcomes. Our policies, programs and operational procedures will reflect the principles and practices that ensure gender equity throughout our organization, programs, and culture.

Commitment

[NAME OF SERVICE PROVIDER] is committed to adhere to the Minimum Standards for Mainstreaming Gender Equality as defined by **The Gender Practitioners Collaborative**.⁸ These are:

⁸ Minimum Standards for Mainstreaming Gender Equality. [The Gender Practitioners Collaborative](#).



1. *Policy.* Adopt and apply a policy that institutionalizes a commitment to gender equity in operations and programs.
2. *Culture and Capacity.* Promote a shared commitment to gender equity by ensuring staff have the proper understanding, skills, and support.
3. *Analysis.* Perform gender analyses for every project, engaging a diverse range of stakeholders and using findings to inform partnerships, design, and implementation.
4. *Budget.* Allocate organizational and program budget resources to meet gender mainstreaming and capacity building needs.
5. *Data.* Collect, analyze, and use sex- and age-disaggregated data for all applicable programs and organizational data collection processes.
6. *Indicators.* Develop and track specific indicators to measure progress toward gender equality.
7. *Do No Harm.* Perform risk assessments and develop corresponding mitigation and response strategies.
8. *Accountability.* Establish accountability mechanisms to monitor the status of gender equality within organizational practices and programming.
9. *Partnerships.* Partner with organizations that bring gender capacity or to commit to building their gender capacity.

Policy Goals

- All [NAME OF SERVICE PROVIDER] staff will be able to articulate how our gender equity approach relates to achievement of our mission.
- [NAME OF SERVICE PROVIDER] programming and culture of gender sensitivity and gender mainstreaming will have a significant and positive impact on the participants we serve in both our partner and our impact target groups.
- [NAME OF SERVICE PROVIDER] will implement and maintain gender non-discriminatory policies and procedures throughout its operations.
- All staff and partners feel equally respected and valued.

Gender Policy Implementation

It is [NAME OF SERVICE PROVIDER]’s goal that all staff will commit to and actively promote [NAME OF SERVICE PROVIDER] gender policies and all staff will hold one another accountable for their implementation. This will be accomplished by:

1. Sharing this document with all staff in headquarters and the field.
2. Providing gender training periodically to all staff.
3. Compiling and sharing gender resources on [NAME OF SHARED LOCATION] and providing space for regular sharing of successes, strengths, and learning.
4. Active promotion of the policy and related procedures by the [NAME OF LEADERSHIP/MANAGEMENT TEAM].
5. Updating policies, manuals, and procedures to ensure inclusion of gender sensitive approaches. These include: [EXAMPLE DOCUMENTS: employee handbook and Code of Conduct, and field manuals].

[NAME OF SERVICE PROVIDER] will periodically assess progress on full integration of gender mainstreaming into program, systems and processes and use results to improve programming and operations for greater gender impact.



Mandatory Program Design Standards

- Across the organization, all staff who undertake program design and implementation efforts will be responsible for ensuring that gender mainstreaming approaches are included as a core element of [NAME OF SERVICE PROVIDER]'s approach and that such efforts are sensitive to the local culture and actively seek to engage men and boys as allies in promoting gender equity.
- Gender must be an explicit part of the proposed Theory of Change.
- Indicators and processes for data collection and analysis must reflect gender mainstreaming goals.
- Program design documents, proposals, capacity building and training approaches, product/service/solution designs, assessments and evaluations should incorporate gender-sensitive principles and practices as well as identify areas where there is potential to do harm.
- Project budgets should contain adequate resources to include gender expertise on teams and allocate funding for outside gender consultants if in-house capacity does not exist.

In addition, whenever possible, program implementation planning should include development of a gender strategy.



Tool 4: Safeguarding Policy Template

Process Description: This tool is a Safeguarding Policy template that is an adapted version of Grameen Foundation’s own Safeguarding Policy inspired by the policy designed by the American Bar Association Rule of Law Initiative (unpublished). There are also several examples of Safeguarding Policies developed by international and national non-governmental organizations that can also be referenced as examples to be followed (for example, see the following safeguarding policy examples and resources: [3ie](#), [Global Giving](#), and [InterAction](#)). For more information on Safeguarding, see the [Safeguarding Resource and Support Hub](#).

This Safeguarding Policy is a comprehensive, umbrella policy that can encompass existing policies, such as whistleblower policies, sexual harassment policies, and non-discrimination policies, among others. While it may be useful to adapt all the language in this policy example, a service provider may also want to integrate some of the language from this policy into existing policies, where relevant.

This policy covers seven basic standards, of which may already be covered in other service provider policies. These standards include:

- Standard 1: Prevention of Violence, Harassment, Exploitation and Abuse
- **Standard 2: Child Protection***
- **Standard 3: Labor Protection and Counter-Trafficking in Persons***
- Standard 4: Non-Discrimination, Diversity, and Inclusion
- Standard 5: Safety and Security
- Standard 6: Privacy and Confidentiality
- Standard 7: Whistleblower Protections
- Standard 8: Digital Safeguarding

Standards 2 and 3 may be of most interest for integrating child protection into internal policies but given service providers serving female entrepreneurs should also attend to the barriers and needs that female entrepreneurs face, the other standards are relevant and may be of interest for inclusion in a safeguarding policy.

Materials Needed: To adapt this policy, other organizational policies should be ready to cross-reference and potentially update.

Steps:

- **Step 1:** Review the language in this policy and compare it to your existing organizational policies.
- **Step 2:** Based on the **Adaptations Needed** as described below, replace the words written in CAPS and put in brackets with your own organizational information. Alternatively, you can consult your existing policies to determine whether adding missing information, such as information on child protection or labor protection, should be added to your own policy.
- **Step 3:** Update any related policies whose language should also change, such as a Code of Conduct that may be affected by the Safeguarding Policy.
- **Step 4:** Follow internal procedures for policy approvals.
- **Step 5:** While not provided with this policy, the development of an internal process and procedural manual will be needed to provide specific guidance on how to implement the policy. For example, the development of a safeguarding team, revising or activating the complaints mechanism, etc. will



need to be explained for Employees to understand how to raise or respond to concerns about adherence to the policy.

- **Step 5:** Share policy and related revised policies and procedure manuals with Employees using existing processes. If no process exists, it will be important to raise awareness and train employees on the concept of safeguarding and the relevance of this policy to their jobs.
- **Step 6:** If relevant, share policy with external stakeholders, for example implementing partners and contractors.

Time Needed: This policy template and its annexes will only take approximately 2-3 hours to review and initially consider. However, adapting it verbatim will take significantly longer, depending on how you need to adapt it and adopt it by your leadership.

Adaptations Needed: This tool has been designed such that a service provider can put their name into the policy, along with articulation of their mission and specific service provider information, objectives, goals, etc. Where the policy can be adapted is noted with ALL CAPS and brackets ‘[.]’. Most adaptations required are references to internal policies, how the service provider references its primary beneficiaries (in this example, reference is made to “Participant” or “Participants,” which can be replaced with words such as beneficiaries, clients, etc.) and its stakeholders, and contacts for complaints or other internal support mechanisms for employees.

Cost Drivers of the Tool: The primary cost driver from the use of this tool is staff time to review and make adaptations to the template for organizational use.

Risks to Consider: The primary risk to any policy is that the policy is approved but not adequately implemented. Adoption of the policy requires consideration and planning of processes and procedures that will need to be created and how to train employees to ensure they understand the objectives of the policy and the key role that each person plays. In other words, they need to understand the implications of the policy and possible ingrained cultural shifts that need to be addressed. Given the importance of the Standards presented in this Safeguarding Policy, a plan for training, building awareness, and supporting the implementation of the policy will be critical to its successful influence over the organizational practices.

Languages: English, French, and Spanish.



Safeguarding Policy Template

Protection from Sexual Harassment, Exploitation and Abuse, Child Abuse, Workplace and Gender-Based Violence, Bullying, Labor Exploitation including Child Labor, Trafficking in Persons, and Discrimination. Commitments to Safety and Security, Privacy and Confidentiality, Whistleblower Protections and Digital Safeguarding.

Purpose

This safeguarding policy (“**SGP**” or “**Policy**”) is designed to protect [NAME OF SERVICE PROVIDER] Employees, Related Personnel, and clients/program participants and their family members from harm arising from association with [NAME OF SERVICE PROVIDER]’s program activities, operations, products, or services. Specifically, it is designed to protect against sexual harassment, exploitation and abuse, child abuse, workplace, and gender-based violence, bullying, labor exploitation including child labor, trafficking in persons, and discrimination. The Policy is further designed to assist [NAME OF SERVICE PROVIDER] in considering risks and mitigation strategies throughout the entire program cycle (planning, design, implementation, monitoring, and evaluation) and to minimize risks that are unavoidable, unknown, or hard to predict, including unintended negative consequences.

Scope

The Policy applies to all [NAME OF SERVICE PROVIDER] Employees and Related-Personnel:

- **Employees** include all employees of [NAME OF SERVICE PROVIDER] and branch offices, wherever located; and
- **Related Personnel** includes board members, volunteers, interns, visitors, consultants/contractors, implementing partners, in addition to individual and corporate contractors of these entities and their related personnel. Related Personnel includes individuals and non-[NAME OF SERVICE PROVIDER] entities and their employees who have entered into partnership or other contractual agreements with [NAME OF SERVICE PROVIDER].

The Policy applies both during and outside normal work hours. Actions taken by [NAME OF SERVICE PROVIDER] Employees and Related Personnel outside of working hours that are seen to contradict this Policy will be seen as a violation of this Policy.

Policy Statement

[NAME OF SERVICE PROVIDER]’s mission is to [ADD SERVICE PROVIDER’S MISSION STATEMENT]. In working with marginalized communities to achieve this mission, we have a responsibility to promote human dignity and ensure our work does not harm those we serve. We also have a responsibility to promote human dignity within our organization and maintain a safe and respectful workplace. We recognize the importance of organizational culture and accountability in creating a safe and supportive organization for our staff, our partners, and the communities with whom we work.

At [NAME OF SERVICE PROVIDER], we believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, workplace, and gender-based violence, bullying, labor exploitation including child labor, trafficking in persons, and discrimination and that no child should be subjected to abuse of any form (collectively “**Prohibited Conduct**”). We believe that Prohibited Conduct, particularly sexual harassment, exploitation and abuse, and child abuse, are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities, particularly those experienced by women,



vulnerable adults and children. We recognize unequal power exists between [NAME OF SERVICE PROVIDER] Employees and the people we partner and work with through our programs, products, and services and between people within our organization. We expect that our power will not be used to advantage ourselves or cause harm to others.

[NAME OF SERVICE PROVIDER] recognizes we have a responsibility to protect people we work with and who work for us, and we will continuously strive to prevent Prohibited Conduct from happening. We take all reports of Prohibited Conduct seriously. Our actions are informed by a survivor-centered approach, which means that the needs and wishes of survivors guide our response, survivors are treated with dignity and respect, and the rights of survivors to privacy and support are prioritized.

We will carefully examine allegations of Prohibited Conduct, investigate, and respond appropriately, taking into consideration the survivor's rights and interests consistent with [NAME OF SERVICE PROVIDER]'s survivor-centered approach. We make very clear that Prohibited Conduct perpetrated by [NAME OF SERVICE PROVIDER] Employees or Related Personnel towards anyone will not be tolerated. [NAME OF SERVICE PROVIDER] will take all appropriate disciplinary action for failure to comply with this SGP and [NAME OF SERVICE PROVIDER]'s associated Code of Conduct or failure to comply with the obligation to report conduct that is, or could be perceived as, breaching any section of this Policy.

Definitions

Definitions related to the Policy are provided in the **Annex to the RICHES SPM Guide (Glossary of Terms, Tool 4: Safeguarding Policy Template Terms)**. *(Note: When adapting this policy, it is advisable to connect the definitions the final policy itself).*

Policy Details

[NAME OF SERVICE PROVIDER] applies the “Do No Harm” (“**DNH**”) principle across all its programs, products, and services and expects [NAME OF SERVICE PROVIDER] Employees and Related Personnel to engage in risk-aware programming and take appropriate safeguarding actions to prevent and mitigate harm. The DNH principle underpins each of the Safeguarding Standards articulated in **Policy Annex 1**, which in turn provide the standards underlying this Policy and related [NAME OF SERVICE PROVIDER] policies. [NAME OF SERVICE PROVIDER] prohibits the conduct contained in the Safeguarding Standards and takes a zero-tolerance approach to inaction regarding allegations of such conduct. When harm does occur, [NAME OF SERVICE PROVIDER] is committed to responding appropriately using a survivor-centered approach, as explained in [NOTE ANY PROCESSES OR PROCEDURAL MANUALS WHERE THE MITIGATIONS STRATEGIES ASSOCIATED WITH THIS POLICY ARE OR WILL BE ARTICULATED].

Oversight

[NAME OF SERVICE PROVIDER]'s [NAME OF RESPONSIBLE PERSON/UNIT/TEAM] will oversee the implementation of this Policy and ensure that it is adhered to in all organizational and programmatic aspects of NAME OF SERVICE PROVIDER]'s operations. This includes incorporating this Policy into the [NAME OF RELATED POLICIES, TRAININGS, CONTRACTS, AND CODES OF CONDUCT].

Violations and Penalties

Failure to comply with this SGP and [NAME OF SERVICE PROVIDER]'s associated Code of Conduct, or failure to comply with the obligation to report conduct that is, or may be perceived as, breaching any section



of this Policy, may result in adverse action, including discipline up to and including termination of employment for [NAME OF SERVICE PROVIDER] Employees and unilateral termination of present and future engagements or business relations for Related Personnel. If the failure to comply also breaches applicable law, [NAME OF SERVICE PROVIDER] may refer the conduct to relevant law enforcement authorities.

Processes and Procedures

To help implement this Policy, [NAME OF SERVICE PROVIDER] has or will develop procedures, tools, and guidance, including: 1) a Risk and Safeguarding Assessment and Action Plan; 2) a Safeguarding Office, Complaint Mechanism, and Investigation Procedures; 3) Safe Program Design Principles and Practices; 4) Hiring and Training Practices; 5) Guidance for Related Personnel; 6) Fundamental Communication Principles; and 6) Fundamental Research Principles. Requests for additional guidance should be addressed to the [THE SAFEGUARDING OFFICE OR NAME APPROPRIATE UNIT WITHIN THE ORGANIZATION THAT WILL OVERSEE SAFEGUARDING].

Related Policies

This SGP serves as an umbrella policy for [NAME OF SERVICE PROVIDER] to guide the following related policies and procedures: [LIST OUT ANY ASSOCIATED POLICIES THAT ARE INFORMED BY THE SGP. THESE WILL OFTEN INCLUDE HUMAN RESOURCES POLICIES RELATED TO HIRING, CODES OF CONDUCT, WHISTLEBLOWER POLICIES, CORPORATE SOCIAL RESPONSIBILITIES POLICIES, DATA PRIVACY, DUE DILIGENCE, GENDER POLICIES, SUBAWARD POLICIES, ETC.]



Policy Annex 1: Safeguarding Standards

[NAME OF SERVICE PROVIDER] prohibits the conduct contained in the following **eight** Safeguarding Standards and takes a zero-tolerance approach to inaction regarding allegations of such conduct. The conduct outlined in the Safeguarding Standards can affect the confidence of [NAME OF SERVICE PROVIDER] Employees, Related Personnel and Clients/Program Participants in [NAME OF SERVICE PROVIDER] and negatively impact its reputation.

Standard 1: Prevention of Violence, Harassment, Exploitation and Abuse

[NAME OF SERVICE PROVIDER] aims to provide a safe, healthy, and efficient working environment, where all persons are treated with civility, dignity, and respect. Furthermore, [NAME OF SERVICE PROVIDER] seeks to have a positive impact on the communities who host our operations and programs and to minimize adverse impacts, including unintended negative consequences.

Workplace Violence

[NAME OF SERVICE PROVIDER] prohibits violence, threats of violence, or bullying during or related to the conduct of [NAME OF SERVICE PROVIDER] business or programming, whether occurring on [NAME OF SERVICE PROVIDER] premises, while travelling, or during functions, trainings, workshops, or meetings held off site. Conduct that threatens, intimidates, frightens, coerces, humiliates, offends, or degrades [NAME OF SERVICE PROVIDER] Employees, Related Personnel or Clients/Program Participants, other stakeholders or members of the public will not be tolerated. Such conduct may also be criminal and may be reported to local law enforcement authorities. [NAME OF SERVICE PROVIDER] Employees and Related Personnel are prohibited from possessing any weapon in a [NAME OF SERVICE PROVIDER] workplace, including firearms or explosives.

Gender-Based, Bias-Motivated and Domestic Violence

[NAME OF SERVICE PROVIDER] considers gender-based, bias-motivated and domestic violence (including intimate partner, child, and elderly abuse) to be serious misconduct and prohibits such conduct even when it is not explicitly illegal in a given context. [NAME OF SERVICE PROVIDER] will take appropriate actions to address allegations of such misconduct by [NAME OF SERVICE PROVIDER] Employees, Related Personnel and Clients/Program Participants that are brought to its attention. Such conduct will be grounds for disciplinary action, including possible termination of employment, contract or agreement.

Bullying and Harassment

[NAME OF SERVICE PROVIDER] prohibits verbal, sexual, or physical harassment and bullying by [NAME OF SERVICE PROVIDER] Employees and Related Personnel that disrupt another person's duties or job performance or that creates an intimidating, offensive, abusive, or hostile work environment. Managers and supervisors have a heightened obligation to ensure their treatment of and interactions with [NAME OF SERVICE PROVIDER] Employees and Related Personnel (including other supervisors) are appropriate and respectful, and that intimidation is not used to make others do something they should not or cannot do. Supervisor intimidation can be more subtle but just as threatening given a supervisor's ability to impose performance or disciplinary actions against [NAME OF SERVICE PROVIDER] Employees and Related Personnel. Those on the receiving end of such conduct are encouraged, but are not required, to inform the harasser that the conduct is unwelcome.



Sexual Harassment (SH)

[NAME OF SERVICE PROVIDER] prohibits SH by [NAME OF SERVICE PROVIDER] Employees, Related Personnel and Clients/Program Participants. Persons who are sexually harassed are encouraged, but are not required, to inform the harasser that the conduct is unwelcome and warn them that it is contrary to [NAME OF SERVICE PROVIDER] policy. Personnel experiencing or observing incidents of SH should inform their supervisor, other management, or human resources or use [NAME OF SERVICE PROVIDER]’s complaint mechanism. [NAME OF SERVICE PROVIDER] will take a survivor-centered approach to handling complaints of SH.

Sexual Exploitation and Abuse (SEA)

SEA and SH are pervasive around the world and may result in serious long-term harm to survivors. [NAME OF SERVICE PROVIDER] acknowledges that all people have a right to live their lives free from sexual violence and abuse regardless of age, gender, sexuality, sexual orientation, gender identity, disability, religion, race, ethnicity, or any other status. Unequal power dynamics are inherent in the work of [NAME OF SERVICE PROVIDER] between and among [NAME OF SERVICE PROVIDER] Employees, Related Personnel, and Clients/Program Participants, and [NAME OF SERVICE PROVIDER] recognizes there is a risk of some people exploiting their position of power for personal gain. [NAME OF SERVICE PROVIDER] recognizes that SEA/SH can be perpetrated by individuals regardless of their gender and may occur against people of a different or the same gender. [NAME OF SERVICE PROVIDER] will take a survivor-centered approach to handling complaints of SEA.

[NAME OF SERVICE PROVIDER] prohibits SEA by [NAME OF SERVICE PROVIDER] Employees, Related Personnel, and Clients/Program Participants and will take action to prevent SEA in its operations and programs. In humanitarian settings, [NAME OF SERVICE PROVIDER] is bound by the [IASC Six Core Principles Relating to Sexual Exploitation and Abuse](#), and thus applies these principles to all its programming (whether in a humanitarian setting or not). As such:

1. Sexual exploitation and abuse by [NAME OF SERVICE PROVIDER] Employees constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to clients/program participants.
4. A consensual sexual relationship with Clients/Program Participants is prohibited unless the [NAME OF SERVICE PROVIDER] Employee was married to the Client/Program Participant prior to the beginning of the [NAME OF SERVICE PROVIDER] program.
5. If a [NAME OF SERVICE PROVIDER] Employee develops concerns or suspicions regarding SEA by another [NAME OF SERVICE PROVIDER] Employee or Related Personnel whether in the same organization or not, they must report such concerns using the complaint mechanism.
6. [NAME OF SERVICE PROVIDER] Employees are obliged to create and maintain an environment which prevents SEA and promotes the implementation of [NAME OF SERVICE PROVIDER]’s



Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

Consensual Relationships

Consensual romantic and/or sexual relationships between an employee with supervisory authority and any subordinate, including one not directly reporting to the supervisor, could compromise [NAME OF SERVICE PROVIDER]’s ability to enforce its policy against sexual harassment. At the same time, a romantic and/or sexual relationship between [NAME OF SERVICE PROVIDER] Employees, Related Personnel and a Client/Program Participant would be a violation of [NAME OF SERVICE PROVIDER]’s policy against SEA. Consequently, if such relationships arise, [NAME OF SERVICE PROVIDER]’s [LEADERSHIP STAFF MEMBER OR APPROPRIATE UNIT], will consider them in the context of this Policy and take appropriate action. If the relationship is between [NAME OF SERVICE PROVIDER] Employees, such action may include a change in the responsibilities of the individuals involved in such relationships or transfer of location within [NAME OF SERVICE PROVIDER] to diminish or eliminate the supervisory relationship and workplace contact that may exist. Any supervisory employee involved in such a relationship is required to report the relationship to [THEIR SUPERVISOR AND/OR HUMAN RESOURCES OR OTHER DECISION-MAKING STAFF MEMBER]. If the relationship is between a [NAME OF SERVICE PROVIDER] Employee and a Related Personnel or a Client/ Program Participant, disciplinary action will be taken with regard to the [NAME OF SERVICE PROVIDER] Employee involved.

Unintended Consequences of [NAME OF SERVICE PROVIDER]’s Programs, Products, or Services

[NAME OF SERVICE PROVIDER] acknowledges that the provision of financial or other business-support services to Clients/Program Participants can unintentionally increase the likelihood of violence or financial stress within the household as social and gender norms shift to start and grow economic opportunities. [NAME OF SERVICE PROVIDER] will assess project, product, and service designs for the likelihood of these risks and monitor these risks through annual client satisfaction surveys to determine any necessary actions for [NAME OF SERVICE PROVIDER] to take to eliminate or mitigate these unintended consequences.

Standard 2: Child Protection

[NAME OF SERVICE PROVIDER] acknowledges that children have the right to be protected from harm. [NAME OF SERVICE PROVIDER] takes seriously its duty of care towards the children that Employees and Related Personnel assist, work with, or come into contact with. In particular, [NAME OF SERVICE PROVIDER] recognizes that children can be intentionally or unintentionally harmed through the delivery of its programs. Thus, [NAME OF SERVICE PROVIDER] will take measures to ensure the safety and welfare of the children that it works with, or comes into contact with, within its programming, and commits to always acting in the best interests of those children. [NAME OF SERVICE PROVIDER] will, to the best of its ability, ensure compliance with [HOST COUNTRY OR NATIONAL] and local child welfare and protection legislation or international standards, whichever gives greater protection. A survivor-centered approach will be applied to children as much as possible.

Child Abuse

Child abuse is one type of harm, consisting of physical abuse, neglect, emotional abuse, sexual abuse, domestic violence, and exploitation.



Under no circumstances will any abuse of children by [NAME OF SERVICE PROVIDER] Employees or Related Personnel be tolerated in [NAME OF SERVICE PROVIDER]’s operations or projects. This includes grooming of children in preparation for abuse. Any instances will be dealt with both according to the disciplinary procedures of the relevant employer and local law enforcement. [NAME OF SERVICE PROVIDER] will always report complaints of criminal behavior against children to local law enforcement authorities. This section requires Employees and Related Personnel to report suspected or witnessed child abuse (including neglect) by the parent or guardian of a child, or by any other person.

Standard 3: Labor Protection and Counter-Trafficking in Persons

[NAME OF SERVICE PROVIDER] is committed to protecting the fundamental human rights of workers, as guided by the [International Labour Organization’s \(ILO’s\) Declaration on Fundamental Principles and Rights at Work](#) which represents the solemn commitment of all ILO Member States to respect, promote, and realize workplace principles and rights in the areas of freedom of association and the effective recognition of the right to collective bargaining; elimination of all forms of forced or compulsory labor; effective abolition of child labor; and elimination of discrimination in respect of employment and occupation. [NAME OF SERVICE PROVIDER] supports these rights, in addition to the principle of equal pay for equal work, in relation to its Personnel and Related Personnel.

[NAME OF SERVICE PROVIDER] adheres to [NAME OF COUNTRY] labor laws and its own human resources policies in relation to its own Employees, which may be more stringent than the ILO Fundamental Principles. [NAME OF SERVICE PROVIDER] prohibits forced labor, child labor or slavery in its employment practices or as a result of any unintended consequences of its projects, products, or services. Children of legal working age [ADAPT AS DEFINED BY NATIONAL LEGISLATION IN THE COUNTRY OF THE WORKPLACE] may work in [NAME OF SERVICE PROVIDER] undertaking non-hazardous work only, which is work that is permitted by law, and does not likely harm the health, safety or morals of children or interfere with their schooling.

Child Labor and Unacceptable Conditions of Work

[NAME OF SERVICE PROVIDER] acknowledges that children have the right to be protected from harm. Given engagement with [MICROFINANCE SERVICES/ECONOMIC STRENGTHENING PROGRAMMING/NAME SERVICE PROVIDER’S SPECIFIC PROGRAMMING] can increase the likelihood of risk to a Client/Program Participant’s child or child under their care, such as increased exposure to workplace safety hazards and in the most extreme cases child labor,⁹ [NAME OF SERVICE PROVIDER] commits to take measures to ensure the safety and welfare of the children and, to the best of its ability, ensure compliance with local child welfare and protection legislation or international standards, whichever gives greater protection. [NAME OF SERVICE PROVIDER] Employees, along with Related Personnel, will not knowingly [DEVELOP PROJECTS/ PROVIDE LOANS/OTHER SUPPORT SERVICES] or for Clients/Program Participants who use child labor or unsafe work practices that put children or employees in harm’s way [AS ARTICULATED IN SERVICE PROVIDER’S SUSTAINABILITY POLICY/EXCLUSION LIST, IF APPLICABLE. SEE THE [INTERNATIONAL FINANCE CORPORATION EXCLUSION LIST](#) AS AN EXAMPLE). [PROGRAMS/BUSINESSES] that

⁹ See [research](#) conducted by the RICHES project which establishes the research base for the relationship between economic strengthening programming and child labor.



typically fall into high-risk areas include [NAME THE SECTORS THAT ARE RESTRICTED FOR PROGRAMMING / LENDING].

Any cases of child labor will be reported to local law enforcement and/or local social support organizations where applicable, following consultation with the victim and the Clients/Program Participants (unless [NAME OF SERVICE PROVIDER] determines that such consultation is not possible because the victim remains in a state of captivity, is otherwise unreachable, would cause additional economic pressure on the household and/or cannot otherwise be mitigated through improving workplace safety concerns).

Trafficking in Persons

[NAME OF SERVICE PROVIDER] follows international standards in relation to the offense of trafficking in persons, which is a form of modern slavery and a grave violation of human rights. [NAME OF SERVICE PROVIDER] will not fund or conduct business with Related Personnel or Clients/Program Participants businesses who use the labor of trafficked persons. Any entity associated with [NAME OF SERVICE PROVIDER] who engages in trafficking in persons for the purposes of labor or sexual exploitation will be promptly reported to local law enforcement, following consultation with the victim (unless [NAME OF SERVICE PROVIDER] determines that such consultation is not possible because the victim remains in a state of captivity or is otherwise unreachable).

Standard 4: Non-Discrimination, Diversity, and Inclusion

[NAME OF SERVICE PROVIDER] prohibits discrimination in all its forms in its Workplaces; in the recruitment, hiring development, training and promotion of Employees; and in its programming, including on the basis of race, ethnicity, sex or gender (including pregnancy, gender identity, gender expression or status as a transgender individual), sexual orientation, color, creed, national origin, citizenship, ancestry, age, disability, veteran’s status, HIV status, religion, belief (or lack thereof), genetic information, education, class, income, urban/rural residence, marital status, parental status, political opinion and affiliation, or other relevant status or characteristic. [NAME OF SERVICE PROVIDER] promotes diversity and inclusion among its own Employees, and in the design of its programs. Programs specifically designed to empower vulnerable or minority groups to remedy existing discrimination or exclusion will not be deemed discriminatory or exclusionary pursuant to this Policy.

Standard 5: Safety and Security

[NAME OF SERVICE PROVIDER] takes safety and security seriously and is committed to providing a safe working environment for Employees and Related Personnel and safe and meaningful engagement of Clients/Program Participants. [NAME OF SERVICE PROVIDER] will provide all staff with training and access to [NAME OF SERVICE PROVIDER]’s [SECURITY POLICY/HANDBOOK], ensuring each office has emergency procedures for evacuation, sheltering in place, and medical emergencies. [NAME OF SERVICE PROVIDER] will ensure its offices undertake an office safety and security risk assessment annually and mitigate security risks identified.

Standard 6: Privacy and Confidentiality

[NAME OF SERVICE PROVIDER] will make all reasonable efforts to ensure that its data collection, storage and security, communications, outreach, and stakeholder engagement activities do not cause harm to Employees, Related Personnel, Clients/Program Participants, or other stakeholders.



[NAME OF SERVICE PROVIDER] Employees must keep all [NAME OF SERVICE PROVIDER] data and information confidential. This includes all personally identifiable information of Clients/Program Participants, Related Personnel as well as general business or project information that [NAME OF SERVICE PROVIDER] has not released to the public, and any complaint made pursuant to this Policy where they are not the complainant.

Identifying information includes photographs, video, audio, names, addresses, and other personally identifiable information, and interview material and quotes attributable to a specific person. Media includes news reports, articles, speeches, publications, blogs, podcasts, and social media posts.

Standard 7: Whistleblower Protections

[NAME OF SERVICE PROVIDER] is committed to maintaining a work environment that complies with all applicable legal, ethical and policy requirements.

[NAME OF SERVICE PROVIDER] welcomes complaints or reports about [NAME OF SERVICE PROVIDER] programs and operations from [NAME OF SERVICE PROVIDER] Employees, Related Personnel, as well as Clients/Program Participants, stakeholders, or members of the public.

Any Employee who files a complaint, or states an intent to complain, or participates in an investigation of suspected breach of this Policy or the Code of Conduct, in good faith, will be protected from retaliation, harassment or adverse employment consequences as a result of making the complaint or participation in the investigation.

Any Employee (particularly directors or supervisors) who harasses or retaliates against such a person shall be subject to disciplinary actions, including termination of their employment or contract. All complaints shall be kept confidential as much as possible to minimize the potential for retaliation.

In relation to Related Personnel, Clients/Program Participants or a member of the public who makes a complaint, [NAME OF SERVICE PROVIDER] will, to the best of its ability, ensure there is no retaliation against the complainant and will support the complainant in resolving the complaint.

Standard 8: Digital Safeguarding

[NAME OF SERVICE PROVIDER] recognizes that digital technologies - often a key feature of [NAME OF SERVICE PROVIDER]'s program services - may pose a short-term or long-term risk of harm. These risks include the erosion of social fabric and human connection as in-person interactions are replaced by online ones or social media, as well as risks to exposure or misuse of Clients'/Program Participants' data during project implementation and beyond. [NAME OF SERVICE PROVIDER] also acknowledges that Clients/Program Participants have the right to manage their own data, such as opting out, during the program timeframes and beyond.

While aiming to decrease the digital divide and using various technology applications for improved efficiency or increased outreach of information, financial resources or other goods and services, [NAME OF SERVICE PROVIDER] strives to anticipate the adverse effects of replacing in-person activities with digital ones and of protecting client data assets.

[NAME OF SERVICE PROVIDER] will, to the best of its ability, identify the potential adverse risks that its digital interventions can have on Clients/Program Participants and seek to mitigate those risks during the program period and beyond.



Tool 5: Code of Conduct Template

Process Description: This tool is a Code of Conduct template that is an adapted version of Grameen Foundation’s own Code of Conduct. It is designed to align with the language found in the Safeguarding Policy found in Tool 2 of this guide. Since most WEE Actors have a Code of Conduct, the sections in the Code of Conduct Template that are **bolded** are those that are aligned with the Safeguarding Policy Language and that may be new to an existing Code of Conduct.

Materials Needed: To adapt this policy, other organizational policies should be ready to cross-reference and potentially update.

Steps:

Step 1: Review the language in this Code of Conduct and compare it to your own.

Step 2: Based on the **Adaptations Needed** as described below, replace the words written in CAPS and put in brackets ‘[...]’ with your own organizational information. Alternatively, you can consult your existing Code of Conduct to determine whether adding missing information, such as information child protection or labor protection, should be added to your Code of Conduct.

Step 3: Update any related policies or manuals whose language should also change to be consistent with the Code of Conduct, such as an employee manual.

Step 4: Follow internal procedures for policy approvals.

Step 5: Share the Code of Conduct and related revised policies and procedure manuals with Employees using existing processes. If no process exists, it will be important to raise awareness and train employees on implications of the revised Code of Conduct for their jobs.

Step 6: If relevant, share policy with external stakeholders, e.g., implementing partners and contractors.

Time Needed: This Code of Conduct template will take approximately 30 minutes to carefully review and consider its implications. However, adapting it verbatim could take 1 hour to several weeks depending on how you need to adapt it and adopt it by your leadership.

Adaptations Needed: This tool has been designed such that a service provider can put their name into the Code of Conduct, along with articulation of their mission and specific service provider information, objectives, goals, etc. Where the policy can be adapted is noted with ALL CAPS and brackets ‘[...]’. Most adaptations required are references to internal policies, how the service provider references its primary beneficiaries (in this example, reference is made to “Participant” or “Participants,” which can be replaced with words such as beneficiaries, clients, etc.) and its stakeholders, and contacts for complaints or other internal support mechanisms for employees.

Cost Drivers of the Tool: The primary cost driver from the use of this tool is staff time to review and make adaptations to the template for organizational use.

Risks to Consider: The primary risk to any policy is that the Code of Conduct is approved but staff are not trained on the implications of the Code of Conduct. A plan for training, building awareness, and supporting the implementation of the Code of Conduct will be critical for the Code of Conduct’s successful influence over the organizational practices.

Languages: English, French, and Spanish.



Code of Conduct Template

Introduction

In order to ensure the successful mission and protect the reputation of [NAME OF SERVICE PROVIDER], it is imperative that [NAME OF SERVICE PROVIDER] Employees and Volunteers, including Board members, wherever located, engage in behavior that is ethically sound and legally compliant. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations and the avoidance of even the appearance of improper behavior or impropriety, as well as a scrupulous regard for the highest standards of conduct and personal integrity. The continued success of [NAME OF SERVICE PROVIDER] is dependent upon our donors,’ partners,’ and participants’ trust and we are dedicated to preserving that trust. [NAME OF SERVICE PROVIDER]’s Employees owe a duty to [NAME OF SERVICE PROVIDER] and its donors, partners, and participants to conduct all activities in a manner that will merit continued trust and confidence.

Contractors are bound by the contract signed with [NAME OF SERVICE PROVIDER], which may include this Code of Conduct depending on the Contractor Statement of Work. Subsidiaries and controlled entities are encouraged to adopt a similar Code of Conduct.

[NAME OF SERVICE PROVIDER], pursuant to its documents of incorporation, and within the confines of its bylaws, has a mission to [COPY IN MISSION STATEMENT]. How [NAME OF SERVICE PROVIDER] performs its mission is as important as the mission itself. [NAME OF SERVICE PROVIDER] must at all times perform its operations in a manner that increases and shows integrity, accountability, responsibility and transparency.

Terms of the Code of Conduct

[NAME OF SERVICE PROVIDER] Employees agree to be bound by this Code of Conduct whenever and wherever they are representing [NAME OF SERVICE PROVIDER], using [NAME OF SERVICE PROVIDER] facilities, equipment, or other resources, which may not be during usual business hours. Representing [NAME OF SERVICE PROVIDER] could include, but is not limited to, social activities where [NAME OF SERVICE PROVIDER] Employees are discussing [NAME OF SERVICE PROVIDER] or when [NAME OF SERVICE PROVIDER] Employees are wearing [NAME OF SERVICE PROVIDER] apparel.

[NAME OF SERVICE PROVIDER], in delivering services and in all other [NAME OF SERVICE PROVIDER] activities, agree to meet the following Code of Conduct. [NAME OF SERVICE PROVIDER] Shall:

- a. Conduct business in accordance with the letter, spirit, and intent of all relevant laws and regulations.
- b. Refrain from any illegal, dishonest, socially inappropriate, or unethical activities.
- c. Comply with all internal policies, procedures, and directives as well as with all applicable laws and regulations.
- d. Strive to preserve and protect [NAME OF SERVICE PROVIDER]’s assets, including office spaces and equipment, and ensure their efficient and proper use. All [NAME OF SERVICE PROVIDER] assets must only be used for legitimate [NAME OF SERVICE PROVIDER] business purposes.
- e. Operate and behave in the best interests of [NAME OF SERVICE PROVIDER].
- f. Use good judgment, based on high ethical principles.
- g. Read and acknowledge this Policy as requested by [NAME OF SERVICE PROVIDER] Human Resources or CEO.



All [NAME OF SERVICE PROVIDER] Employees Shall Not:

- a. Accept, or seek on behalf of any person, any financial advantage or gain of other than nominal value offered as a result of the [NAME OF SERVICE PROVIDER] Employee’s affiliation with [NAME OF SERVICE PROVIDER].
- b. Knowingly take any action or make any statement intended to influence the conduct of [NAME OF SERVICE PROVIDER] in such a way as to confer any financial benefit on any person, corporation or entity in which the individual has a significant interest or affiliation.
- c. Publicly use [NAME OF SERVICE PROVIDER] affiliation in connection with the promotion of partisan politics, religious matters, or positions on any issues not in conformity with [NAME OF SERVICE PROVIDER]’s vision and beliefs.
- d. Disclose or use any confidential [NAME OF SERVICE PROVIDER] information that is available solely as a result of the affiliation with [NAME OF SERVICE PROVIDER], to or with any person not authorized by [NAME OF SERVICE PROVIDER] to receive such information, or to use any [NAME OF SERVICE PROVIDER] information to the disadvantage of [NAME OF SERVICE PROVIDER] (see Confidential Information Policy).
- e. Authorize the use of the [NAME OF SERVICE PROVIDER] name or logo, funds, trademarks, services or property] for personal gain, or for the benefit or advantage of any person except in conformance with [NAME OF SERVICE PROVIDER] policy.
- f. Operate or act in a manner that creates a conflict with the interests of [NAME OF SERVICE PROVIDER] (see Conflict of Interest Policy).
- g. Engage in sexual activity with children (persons under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.**
- h. Engage in sexual relationships between [NAME OF SERVICE PROVIDER] staff and beneficiaries of assistance, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of [NAME OF SERVICE PROVIDER] and are strongly discouraged.**
- i. Engage in exploitation of child labor or labor that compromise the health, safety, mental and social development, and schooling of a child (Note: a Child is a person under the age of 18).**
- j. Engage in any activities that may support or lead to slavery, servitude, forced and compulsory labor and human trafficking.**

Reporting

[NAME OF SERVICE PROVIDER] Employees shall report unethical conduct, illegal behavior, fraud, abuse, or waste in accordance with the [NAME OF POLICY, MOST LIKELY CALLED A WHISTLE BLOWER POLICY], including reporting to [INDICATE APPROPRIATE PERSON AN EMPLOYEE SHOULD REPORT TO, LIKELY THEIR SUPERVISOR, MEMBER OF LEADERSHIP TEAM, HUMAN RESOURCES, LEGAL TEAM, ETC.] If a situation arises where the employee is not sure if there is a violation of a [NAME OF SERVICE PROVIDER] Policy, the employee should seek advice or counsel from [INDICATE APPROPRIATE PERSON AND EMPLOYEE WHOULD REPORT TO, LIKELY THEIR SUPERVISOR, MEMBER OF LEADERSHIP TEAM, HUMAN RESOURCES, LEGAL TEAM, ETC.]. We must maintain an environment in which [NAME OF SERVICE PROVIDER] Employees feel free to call attention to potential legal or policy violations and to investigate impartially the related concerns. [NAME OF SERVICE PROVIDER] will not retaliate against any individual for reporting suspected violations of laws, regulations or [NAME OF SERVICE PROVIDER] policies in good faith. In addition, we will not tolerate retaliation against



[NAME OF SERVICE PROVIDER] Employees for such reporting. [NAME OF SERVICE PROVIDER] Employees are expected to cooperate with internal investigations of misconduct.

Consequences

Disregarding or failing to comply with this Code of Conduct could lead to disciplinary action, up to and including termination of employment.

Contact [NAME DEPARTMENT OR UNIT, SUCH AS HUMAN RESOURCES OR LEGAL DEPARTMENT] for more information or questions about the Code of Conduct.

Signature

Date:



Tool 6: Do No Harm Assessment for Projects, Products, and Services

Process Description: This is an adapted version of Grameen Foundation’s own Do No Harm Assessment that is used to identify key concerns related to providing products and services or implementing project activities. It is designed to be a living document that is adapted for specific projects, products, and services revised and consulted over time, starting ideally at the proposal stage through project closure. This Do No Harm Assessment is similar to other Safeguarding Risk Assessments, which is an alternative title. For examples of other Safeguarding Risk Assessments and safeguarding resources, see the [Safeguarding Resource and Support Hub](#).

Materials Needed: Related project documents may be useful when filling out the Assessment, such as project proposals, market research reports, impact evaluations, etc.

Steps:

- **Step 1:** Review the Do No Harm Assessment to familiarize yourself of the dimensions assessed. There are ten guiding words that start with the letter **A** and their associated questions. The purpose of the 10 As is to help staff remember the dimensions of the Assessment if there is not enough time to answer all questions, such as when considering Risks at a proposal stage for a new project.
- **Step 2:** Answer the questions and document any concerns that are noted from the answers that may pose a risk to Program Participants.
- **Step 3:** Evaluate the seriousness of the risk for causing harm and the likelihood of this risk becoming a reality. How to evaluate the seriousness of the risk is explained in the tool.
- **Step 4:** Develop potential mitigation strategies. How to prioritize different mitigation strategies is explained in the tool.
- **Step 5:** After answering the questions related to the 10 As, consider the key risk implications and determine who will be responsible and the timeline for addressing the concern.
- **Step 6:** Indicate which concerns you will not directly address and why. While the assessment will likely raise several concerns, not all concerns are within the control of the organization or concerns that an organization feels confident directly addressing.

Time Needed: This Assessment can take approximately 2 hours to complete, or longer, depending on the number of staff involved. Given it is advisable to update the Assessment over time, it might only require 10-15 minutes to update.

Adaptations Needed: This tool uses the terms Participant or Participants to describe a WEE Actor’s beneficiaries (which can be replaced with words such as beneficiaries, clients, etc.). This can be revised to use organizationally-relevant terms.

Cost Drivers of the Tool: The primary cost driver from the use of this tool is staff time to answer the questions and update the tool.

Risks to Consider: There are no known risks to using this tool.

Languages: English, French, and Spanish.



Do No Harm Assessment

Background

What are the potential risks associated with the project, product, or service? This Do No Harm Assessment should be a living document, from the proposal stage to the project exit stage. Periodically, the document should be updated as new information or experience is gained. There are ten guiding words that start with the letter **A** that will be covered below. The proposed project should be assessed by the program team to identify potential risks associated with each A. Notes, concerns, data should be documented associated to each dimension, or A-word. The risks should be evaluated in terms of their degree of seriousness, or priority action, using the following descriptions:

- **Serious:** Can increase likelihood of violence, gender-based violence, injury, permanent disability, death, result in participant drop-out/refusal/inability to engage in the project and/or very likely to occur or be experienced frequently (daily/weekly/monthly) or seriously impact the project.
- **Moderate:** Can increase conflict, such as arguments, limit participant engagement, reduce participant (or other indirect participants such as spouses or community members) satisfaction or perception of the program and/or likely to occur or be experienced periodically (every month or two or seasonally) or only moderately impact the project.
- **Low:** May only impact a few participants for special reasons, can easily be mitigated and/or very unlikely to occur or be problematic or be experienced infrequently/rarely happens.

For each risk identified, develop mitigation strategies, and address the risk using **WISE solutions**. WISE stands for: **Warn, Isolate, Substitute, and Eliminate**. Elimination is the most effective way to address a risk while simply warning about hazards is the least effective strategy.

While this tool can be used generally, sample strategies are provided in parentheses related to women’s businesses at risk of child labor, such as “children working at night in women’s businesses”.

- **Warn:** Communicate about, train, and supervise participants and others to avoid hazards (*Ex. Teach young workers to wear light colored or reflective clothing when performing night work; utilize warning lights to bring more attention to nighttime physical hazards in the workplace.*)
- **Isolate:** Put distance or other barriers to protect participants and others from encountering risks. This includes, for example, social distancing and the use of personal protective equipment such as masks and gloves. (*Ex. Use gates, barricades, or ropes to block children’s access to worksite areas that are unsupervised at night.*)
- **Substitute:** Make changes to personnel, equipment, supplies, processes, or other factors to decrease risks (*Ex. Substitute lower with brighter lighting to improve visibility in workspaces.*)
- **Eliminate:** Completely remove or stop a risk (*Ex. Eliminate nighttime work (generally from 8 p.m. to 6 a.m.) performed by children.*)

Finally, once the assessment has been completed, the team should synthesize key priorities and action items as well as issues that cannot be adequately addressed by the program and why.



10 As of Do No Harm	Key Questions	Assessment	Potential Impact of Risk (<i>Serious, Moderate, Low</i>)	Potential Mitigation Strategies (WISE)
<p>Actors <i>(People engaged with a project, product, or service)</i></p>	<ul style="list-style-type: none"> • Have you identified the key gatekeepers to women’s access and benefit of the services? <i>(A gatekeeper is anyone who can prohibit or restrict a participant’s participant in a project or use of a product or service. Gatekeepers can be husbands, community leaders, political parties, family members, etc.)</i> • Have you identified stakeholders that have potential to “divide” or “connect” participants to the intervention? What are strategies to leverage the “connectors” and mitigate risks/influence of the “dividers”? • Does your market research plan/implementation plan describe how and when the actors will be engaged? 			
<p>Awareness <i>(How people are made aware of a project, product, or service)</i></p>	<ul style="list-style-type: none"> • Does your market research plan/implementation plan consider how gatekeepers will be included/informed? • Has the project plan considered whether gatekeepers and women should be informed together, separately, and why? 			
<p>Availability</p>	<ul style="list-style-type: none"> • Has the market research plan and implementation plan considered how 			



<p><i>(Likelihood of participants being capable of participating in an activity)</i></p>	<p>the intervention will affect women’s time use? How much burden will be added or taken away and how can these risks be mitigated?</p> <ul style="list-style-type: none"> • Has the plan considered when women can be available and the safety considerations for traveling to and from meetings, as well as points for the intervention? 			
<p>Agents <i>(People who offer project activities, product, or services to a participant)</i></p>	<ul style="list-style-type: none"> • Who are the key agents, including any person that will engage directly with participants when offering the products and services? • Have agents been trained in gender/power dynamics? Would they hold any personal or collective biases? • Are there any risks to the agent offering the services and/or the women’s interaction with this agent (should women only be served by women agents? Should a male/female pair be encouraged?)? 			
<p>Additional Services <i>(Any service not considered core to an organization’s strategy)</i></p>	<ul style="list-style-type: none"> • Does your intervention plan address any gaps in products/services that are needed to achieve program goals? • How can these gaps be filled directly by the organization? • What partnerships may be necessary to round out the known needs of women? 			
<p>Appropriateness</p>	<ul style="list-style-type: none"> • How contextually-appropriate is the intervention, particularly regarding any 			



<p><i>(How suitable a project, product, or service is to meeting needs of participants)</i></p>	<p>social norms that may be challenged through the design, implementation, and evaluation of the intervention?</p> <ul style="list-style-type: none"> • How will you engage different actors who can share information and perspectives on social norms that will influence the outcomes of the intervention as well as women’s experiences when participating? • If intervention has been implemented in a different context, which social norms may be the most important to confirm through market research? 			
<p>Adoption <i>(Decision or action taken to participate in an activity or use a product or service)</i></p>	<ul style="list-style-type: none"> • What practices, procedures, or norms will encourage or prohibit women from accessing and adopting products or services of the intervention? What discriminatory practices, and/or gender-blind practices will need to be addressed? • What processes, procedures or design features may reduce women’s ongoing participation and benefit? How will these change over time? 			
<p>Agency <i>(Ability to make one’s own decisions)</i></p>	<ul style="list-style-type: none"> • What control or say will women be required or will gain with the intervention? • Has agency (decision-making power and control) been considered at all stages and for all interventions? 			



<p>Durability <i>(Sustainability of impacts of the intervention, product, or service)</i></p>	<ul style="list-style-type: none"> • What is the risk to women and their well-being when the project ends? • What is the plan for continued and sustainable availability and access to services? 			
<p>Assessment <i>(Evaluation and lessons learned)</i></p>	<ul style="list-style-type: none"> • Is there an existing grievance redressal mechanism for various touchpoints with participants? • Does your implementation plan articulate how data will be used to monitor the potential for harm? • Which data points will be critical and how will they be collected (ex. gender-disaggregated data points, in-depth assessments, etc.)? • Are any research/evaluation questions themselves capable of causing harm? 			



Key Implications

1. What are key implications of the results from the Do No Harm Assessment on the proposed intervention?
What are prioritized responses that the program plans to take to mitigate the risks and who is responsible for taking those actions?

Key Finding	Response/Mitigation Strategy	Responsibility and Timeline for Response
1		
2		
3		
4		
5		

2. What risks cannot be addressed by the proposed program and why?

Key Finding	Reason for Omission
1	
2	
3	
4	
5	



Annexes

Acronyms and Glossary of Terms

Acronym	Definition
HR	Human Resources
ILO	International Labour Organization
M&E	Monitoring and Evaluation
MIS	Management Information System
MOU	Memorandum of Understanding
OCFT	Office of Child Labor, Forced Labor, and Human Trafficking
RICHES	Reducing Incidences of Child Labor and Harmful Conditions of Work in Economic Strengthening Initiatives
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SGP	Safeguarding Policy
SPI-4	Social Performance Indicators Tool, Version 4
SPM	Social Performance Management
SPTF	Social Performance Task Force
UACW	Unacceptable Conditions of Work
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organization
USDOL	U.S. Department of Labor
WEE	Women’s Economic Empowerment

SPM Guide Terms

Term	Definition
Children at Risk of Engaging in Harmful Child Work	<p>A child at risk of engaging in harmful child work is one who meets one or more of the following conditions:</p> <ol style="list-style-type: none"> 1) Living in an area where child labor is prevalent; 2) Living in poverty (as defined by national standards); 3) Of school age, but not attending school; 4) Having one or more siblings engaged in child labor; 5) Orphaned; 6) The head of a household; 7) Affected by a disability; and 8) Living in an area with low school enrollment or high dropout rates.
Child Work	Household chores and forms of legal work, including light work. This type of work does not interfere with schooling. According to international standards, the minimum age for work is 14 or 15, depending on the country, as some developing countries have lower minimum ages for work.
Do No Harm	An ethical obligation to make all reasonable efforts to be aware of, mitigate or eliminate risks that communications, outreach, and programs, products, services, and



	other activities do not cause physical, emotional, financial, sexual, spiritual harm of Employees, Related Personnel or Participants.
Frontline-level Staff	Frontline-level staff refers to WEE Actor staff who work directly with women to help achieve WEE objectives and are primarily based at the field-level. Frontline-level staff may be trainers, community agents, credit officers, social workers, and agricultural extension agents, among others.
Harmful Child Work (Child Labor)	Harmful work for children, or child labor , is any work that hinders a child’s development and work that is: a) physically, mentally, or morally dangerous and harmful for children; and b) interfering with a child’s schooling. The term harmful child work is also used interchangeably with harmful work for children or child labor . The RICHES Toolkit also identifies harmful child work as any child work that is Difficult, Dangerous, or Dirty (also known as the 3 Ds).
Harmful Work for Adults	Any conditions of work that are considered to be detrimental, such as wages that do not provide for a decent living for workers and their families, hours of work that exceed eight hours a day/48 hours per week, and poor occupational health and safety conditions. Harmful working conditions are most present in the informal sector, where many female-run enterprises are run; vulnerable work, such as contract work and work in environments that lack or have limited legal protections; in forced labor, which is the most egregious form of work and is particularly common in domestic work, construction, manufacturing, agriculture, horticulture, and in the hospitality and sex industries; or precarious work, which includes unstable work situations such as temporary and/or informal work such as the domestic care work sector, the cleaning sector, kitchen work, market work, and manufacturing.
Management-level Staff	Management-level staff refers to WEE Actor staff who are primarily based at the headquarters level of the organization and lead strategy and program development and oversight.
Management Information System (MIS)	For some WEE Actors, an MIS is a generic term for the data system used to capture participant-level data, such as demographic data, business information, loan data, etc. It may also be considered as the core banking system or a customer relationship management system. It is being used generically in this guide as well, for any system used by a WEE Actor to track participant-level data. Example MIS are Mifos , TaroWorks , Musoni , Microfins , TrustBankCBS SaaS , Salesforce , and Tenemos , among many others. MIS systems mentioned here do not suggest endorsement but are simply illustrative.
Participants	Participants refer to women receiving services provided by WEE Actors. Participants can be women living in developing economies that own businesses, engage in livelihood activities, are participants of financial service providers, or participate in trainings to increase their access to economic opportunities. Depending on the WEE Actor, they can also be referred to as clients, beneficiaries, or members.



RICHEs Toolkit	A collection of tools that seek to assess the risks of, raise awareness about, and mitigate the risks of harmful work for children and adults among WEE Actors and their participants. The RICHEs toolkit includes: an online portal for accessing the toolkit, risk assessments and diagnostics for assessing risks of harmful child work, market research and monitoring and evaluation tools, paper-based and video-based dialogue-based curriculum, management and frontline-level staff training, and guides for linking out to child protection organizations and facilitating intra-household and community dialogues.
Safeguarding	Any action taken to prevent or mitigate harm.
Social Performance	The effectiveness of a service provider in achieving its stated social goals and creating value for its participants. (SPTF)
Social Performance Management	Refers to the systems that organizations use to achieve their stated social goals and put customers at the center of strategy and operations. (SPTF)
Women’s Economic Empowerment (WEE)	Women’s economic empowerment is a process by which women increase their power to succeed as equal and active participants in the economy. This includes women’s enhanced access to and control of human, economic, and social resources (power over); individual agency to make independent decisions that benefit themselves, their families, communities, and nations (power to); personal assets, including knowledge, skills, self-confidence, resilience, and ability to take and manage risk (power within); and collective assets, such as support services and networks (power with). Women’s economic empowerment is critical to achieving gender equality, poverty reduction, economic growth, and other sustainable development goals.
Women’s Economic Empowerment (WEE) Actor or Initiatives	Broadly refers to entities or individuals that support the development or expansion of women’s businesses, provide livelihood or financial services and/or support women (globally) in efforts to increase their access to economic opportunities, especially those living in developing economies. WEE Actors can be microfinance institutions, savings group support organizations, non-governmental organizations, donors, investors, or government programs.
Unintended Consequences	Outcomes of a purposeful action that are not intended or foreseen. In this context, unintended consequences are assumed to be negative or harmful.

Tool 3: Gender Policy Template Terms

Term	Definition
Gender	Gender refers to the roles, behaviors, activities, and attributes that a given society at a given time considers appropriate for men and women. Gender also refers to the relations between women and those between men. These attributes, opportunities and relationships are socially constructed and are learned through socialization processes. They are context/ time-specific and changeable. (UN)
Gender equality	The equal rights, responsibilities and opportunities of women and men and girls and boys. Equality does not mean that women and men will become the same but that women’s and men’s rights, responsibilities and opportunities will not depend on whether they are born male or female. Gender equality implies that the interests, needs and priorities of both women and men are taken into consideration, recognizing the



	diversity of different groups of women and men. Gender equality is not a women’s issue but should concern and fully engage men as well as women. Equality between women and men is seen both as a human rights issue and as a precondition for, and indicator of, sustainable people-centered development. (UN)
Gender equity	Process of being fair to men and women. To ensure fairness, measures must often be put in place to compensate for the historical and social disadvantages that prevent women and men from operating on a level playing field. Equity is a mean. Equality is the result. (UNESCO)
Gender mainstreaming	Mainstreaming a gender perspective is the process of assessing the implications for women and men of any planned action, including legislation, policies, or programs, in any area and at all levels. It is a strategy for making the concerns and experiences of women as well as of men an integral part of the design, implementation, monitoring and evaluation of policies and programs in all political, economic and societal spheres, so that women and men benefit equally, and inequality is not perpetuated. The ultimate goal of mainstreaming is to achieve gender equality. (UN)

Tool 4: Safeguarding Policy Template Terms

Term	Definition
Assistance (to survivors)	Includes medical services, psycho-social services, legal assistance, police services, special services for trafficked persons or domestic violence victims, and housing and social services.
Participants	Any person who directly or indirectly benefits from an organization’s program, project, product, or service, including attendees of training sessions, workshops, and seminars; end users of financial products and services or digital tools and their family members; and community members. Can be referred to as clients, beneficiaries or by other relevant terms.
Child	Any person who has not attained the age of 18 years, despite any local law defining a different age of majority or age of consent. Mistaken belief as to the age of the child is not a defense.
Child Abuse	Physical, sexual and/or emotional abuse, exploitation, and neglect (all defined below), trafficking, or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child’s health, well-being, survival, development, or dignity. It includes, but is not limited to, any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child. (See also definition for worst forms of child labor under the definition for Child Labor). <ul style="list-style-type: none"> • Physical Abuse – acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm, or risk of harm to a child’s health or welfare, or death. Such acts may include, but are not limited to punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.



	<ul style="list-style-type: none"> ● Sexual Abuse – fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials. ● Emotional Abuse or ill-treatment – injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to, humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed. ● Exploitation – the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child’s physical or mental health, development, education, or well-being. ● Neglect – failure to provide for a child's basic needs by persons who are responsible for the care of a child. ● Grooming – behavior that makes it easier for an offender to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, their family, or their community, and then seek to sexualize that relationship (e.g., by encouraging romantic feelings or exposing the victim to sexual concepts through pornography). Grooming often involves normalizing their behavior to everyone, not only the child, and can also involve bestowing gifts, favors or money on the child, their family, and/or the community.
Child Labor	<p>Any work that deprives children of their childhood, their potential, and their dignity, and that is harmful to their physical and mental development. The worst forms of child labor, as defined by ILO Convention 182, include all forms of slavery and forced or compulsory labor, including trafficking of children, child prostitution and pornography, engaging children in other illicit activities such as drug trafficking, and any work, by its nature that is likely to harm the health, safety, and morals of children. In relation to children undertaking work in in an organization, child labor is defined as <u>any work</u> by a child under the legal age [varies by country and is defined by national law or international law where a national law does not exist, whether paid or unpaid.]</p>
Complainant	<p>A person or a party making the complaint, including the alleged survivor of the safeguarding breach or another person who becomes aware of the wrongdoing.</p>
Consent	<p>Consent is an agreement to sexual acts, freely given without any element of force, fraud, deceit, or coercion - whether physical, emotional, economic or social in nature. The two necessary components of consent are that it be both informed and voluntary, meaning involved persons fully understand the sexual act to which the agreement of “yes” is made, without any use of influence, force, or coercion. Children are minors and can never give consent to a sexual relationship with an adult.</p>
Contractors	<p>Third parties (individuals or legal entities) that undertake work or conduct business with or for an organization, including independent contractors, consultants, volunteers, fellows, and interns, whether paid or unpaid. In the Safeguarding Policy the term “Contractor” does not apply to implementing partners or Subcontractors.</p>
Domestic Abuse	<p>A pattern of behavior in any relationship, either within a household or with an intimate partner, that is used to gain or maintain power and control over that person.</p>



	Abuse can be physical, sexual, emotional, economic or psychological actions or threats of actions that influence another person. This includes any behaviors that frighten, intimidate, terrorize, manipulate, hurt, humiliate, blame, injure or wound someone. Victims are most often intimate partners, but may also be children, parents, or other relatives or members of the household.
Employees	Includes all headquarters and local staff holding a contract of employment with an organization, excluding contractors, both full-time and part-time, in any role, and specifically includes managers and supervisors.
Implementing Partners (IPs)	International or local organizations and institutions (public and private) which sign agreements (e.g., subaward agreements or memoranda of understanding (MOUs)) with an organization and are implementing or supporting an organization’s activities.
Intimidation	Any behavior or pattern of behavior which frightens or is reasonably calculated to frighten another into submission, silence, compliance, or acquiescence with respect to behaviors or actions that are inappropriate, unlawful, or violative of policy or procedure or which unreasonably disrupt or create a hostile work environment.
Reporter	A person or party reporting or escalating a complaint.
Respondent	Respondent is a person or party against whom the complaint is made.
Retaliation	Any action taken by a Respondent to silence a Reporter’s complaint, such as a job termination, demotion, or relocation or otherwise, threatening, intimidating, or frightening them with adverse action.
Safeguarding	Any action taken to prevent or mitigate harm.
Safeguarding Focal Point or SFP	An individual (typically an Employee) appointed to oversee and perform specific functions under a Safeguarding Policy.
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment as defined below.
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another. This includes forced marriage, sexual slavery, and sex trafficking.
Sexual Abuse	Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes any sexual activity with a child defined under “Child Abuse” above.
Sexual Harassment	Any unwelcome sexual advance, request for sexual favor, unwelcome verbal or physical conduct or gesture of a sexual nature (e.g., through a joke, email, or another form of communication), offensive remark related to a person’s sex, gender, gender identity, or sexual orientation, or any other behavior of a sexual nature that may (1) cause offence or humiliation to another or disrupt another person’s duties or job performance, (2) create an intimidating, offensive, abusive or hostile work environment, or (3) result in an adverse employment decision (such as the victim being fired or demoted).
Survivor-Centered Approach	Means that the approach to a complaint seeks to place at the center of the process the survivor’s dignity, experiences, considerations, needs, and resiliencies in investigating and responding to incidents. A survivor-centered approach helps to promote a survivor’s recovery and to reinforce their capacity to make decisions about possible



	interventions.
Trafficking in Persons	The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, or the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude or the removal of organs. Consent is irrelevant where any of the means above are used. The recruitment, transportation, transfer, harboring or receipt of a child for the purpose of exploitation is considered “trafficking in persons” even if this does not involve any of the means above.
Unacceptable Conditions of Work	The ILO defines unacceptable conditions of work as those that “deny fundamental principles and rights at work, put at risk the lives, health, freedom, human dignity and security of workers or keep households in conditions of poverty.”
Unintended Consequences	Outcomes of a purposeful action that are not intended or foreseen. In this context, unintended consequences are assumed to be negative or harmful.
Vendors	Individuals or companies that supply [NAME OF SERVICE PROVIDER] with goods and services through contracts (e.g., hotels, providers of transport or vehicles, food and catering, maintenance works, and office and IT equipment). Note that Vendors are also included within the definition of “Contractors”.
Visitors	Anyone who visits an organizational office or engages with or observes participants. This includes journalists, donors, board members, IP staff or other interested persons.
Volunteers	Anyone who provides short-term services on behalf of an organization on a pro-bono basis or who is financially compensated by another entity.
Workplace	Any location where the work or activities of an organization are taking place (whether in an office or outside, e.g., in a hotel, at a participant's place of business, an IP’s office, or any other location), as well as the immediate vicinity of any such location.
Workplace Bullying	Any pattern of behavior occurring in the Workplace that harms, intimidates, offends, degrades, threatens, berates, humiliates, or prevents work from getting done and which is directed towards any employee, contractor, IP’s employee or participants.
Workplace Harassment	Unwanted conduct occurring in the Workplace, where a person (e.g., Employee, Related Personnel, Participant) is subjected to behavior that is repeated, unwelcome, and unsolicited; the person considers it to be offensive, intimidating, humiliating, or threatening; and/or a reasonable person would consider it to be offensive, humiliating, intimidating, or threatening. Workplace harassment covers a wide range of behaviors and can include unwelcome physical, verbal, or non-verbal conduct.



Acknowledgments

This tool was developed by Bobbi Gray of Grameen Foundation with support from Amelia Kuklewicz of Grameen Foundation. Graphics were designed by Lilli Beth Gelvezon, an independent consultant and Jenna Smith of Grameen Foundation. Final editing was conducted by Jenna Smith.

The team is grateful to Sarah Sunderlin Simpson, Kristen Pancio and Alexander Billings of the Office of Child Labor, Forced Labor, and Human Trafficking (OCFT) for their direction, editing, design input, and support during the development of this tool. The team also thanks the many OCFT staff who took time to review drafts and provide design and editing support, including Kristen Pancio, Alexander Billings, and Tanya Shugar.

Finally, the team extends our deep gratitude to all those who helped organize and participate in pilot trainings and learning events, especially for their creative ideas, recommendations, and suggestions that helped guide the refinement of this tool. In particular, the team wishes to acknowledge the following individuals:

- Amelia Greenberg, Social Performance Task Force (SPTF)
- Johanna Ryan, Vision Fund International, UK
- Tessa Joy Policios, Community Economic Ventures, Inc. (CEVI), the Philippines
- Luz Coronado, Saint Elizabeth Community Development Program (SECDEP), the Philippines
- Ever Rios, Karla Núñez, CrediCampo, El Salvador
- Luis Corea, Organización de Desarrollo Empresarial Femenino (ODEF), Honduras
- Anna Kanze, Grassroots Capital, USA
- Anthony Randazzo, US International Development Finance Corporation (DFC)
- Paola Menéndez, Banco Pinchincha, Ecuador
- Adetunji Afolabi, Nigerian Microfinance Platform
- Abel Oveneri, LAPO Microfinance Bank, Nigeria
- Kenneth Okakwu, LAPO Institute for Microfinance and Enterprise Development, Nigeria
- Edgar Aguilar Paucar and Patricia Richter, International Labour Organization (ILO)



“RICHES Social Performance Management Guide” by Bobbi Gray and Amelia Kuklewicz of the RICHES project led by Grameen Foundation USA and American Bar Association Rule of Law Initiative is licensed under [CC BY 4.0](https://creativecommons.org/licenses/by/4.0/). Through this Creative Commons license, you are encouraged to remix, transform, and build upon this material.

To cite this work, we suggest the following citation:

Gray B, Kuklewicz A. (2022). RICHES Social Performance Management Guide. Grameen Foundation and American Bar Association Rule of Law Initiative. <https://grameenfoundation.org/riches/riches-toolkit/spm-guide>

If this work is adapted for private or commercial use, we encourage the following acknowledgment:



This work, “[*NAME OF YOUR DERIVATIVE/ADAPTATION*]” is a derivative of “[RICHES Social Performance Management Guide](#)” licensed under [CC BY 4.0](#) by Bobbi Gray and Amelia Kuklewicz of the RICHES project led by [Grameen Foundation USA](#) and [American Bar Association Rule of Law Initiative](#) and supported by the [U.S. Department of Labor, Office of Child Labor, Forced Labor, and Human Trafficking](#). This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the United States Government. Neither does this material suggest endorsement by Grameen Foundation USA or the American Bar Association Rule of Law Initiative.