Gender-Based Violence (GBV)

Prevention, Mitigation and Response Policy

Revision: December 2024

Gruppo per le Relazioni Transculturali
Via Molino delle Armi, 19 - 20123 Milano
Tel. 0226681866 - E mail grt@grtitalia.org
Codice Fiscale: 80120910155

GRT Gender-Based Violence (GBV) Prevention, Mitigation and Response Policy

---

1. Purpose and Scope

Gender-Based Violence (GBV) is a severe human rights violation that affects individuals' safety, dignity, and well-being across all societies. This policy is designed to establish a framework for preventing, mitigating, and responding to GBV within GRT's operational contexts, ensuring the protection of all individuals, particularly vulnerable populations such as asylum seekers, refugees, stateless persons, internally displaced persons (IDPs), and returnees. It also stresses the obligation to mitigate risk and to 'Do No Harm.'

The process of addressing GBV within GRT involves fostering a safe and inclusive environment, promoting a human rights-based approach in all programs, encouraging respectful behavior, and developing appropriate tools to identify, report, and respond effectively to concerns related to GBV.

GRT recognizes that GBV affects people of all genders and backgrounds but disproportionately impacts women and girls. This policy highlights the imperative not only to respond to violence once it has occurred, but also, importantly, to prevent GBV by addressing its root causes and seeks to embed gender equality principles across all areas of GRT's work, ensuring that staff, partners, and stakeholders uphold and promote a culture of zero tolerance towards GBV.

Compliance with this policy is mandatory for all employees, contractors, volunteers, and implementing partners involved in GRT's programs.

---

2. Rationale

GRT's GBV Prevention, Mitigation and Response Policy aligns with international legal and policy frameworks that establish obligations for humanitarian and development actors to prevent and respond to GBV. These include:

- **International Treaties and Agreements:**
  - The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
  - The UN Declaration on the Elimination of Violence Against Women
  - The Call to Action on Protection from GBV in Emergencies
  - The Inter-Agency Standing Committee (IASC) Guidelines for GBV in Humanitarian Settings
- **Global Commitments and Frameworks:**
  - The 2030 Agenda for Sustainable Development (SDG 5: Gender Equality and SDG 16: Peace, Justice, and Strong Institutions)
  - The GBV Accountability Framework
  - The Inter-Agency Minimum Standards for GBV Programming in Emergencies
  - The IASC Six Core Principles on Sexual Exploitation and Abuse (SEA)

This policy also complements GRT's internal regulations, including its Code of Conduct, Child Protection Safeguarding Policy, Anti-Corruption and Fraud Policy, and Internal Disciplinary Regulations.

---

3. Definitions

3.1 Gender-Based Violence (GBV)

GRT adopts the IASC definition of Gender- Based Violence (GBV) as 'an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.' GBV is based on patriarchal power relations and gender discrimination.

3.2 Common Forms of GBV

- **Physical violence:** Assault, domestic violence, and harmful traditional practices (e.g., honor killings, forced marriages, early and child marriages, female genital mutilation (FGM)).
- **Sexual violence:** Rape, sexual assault, harassment, trafficking for sexual exploitation, and forced prostitution.
- **Psychological violence:** Intimidation, humiliation, coercive control, and threats of harm.
- **Economic violence:** Withholding financial resources, economic coercion, and denial of access to employment opportunities.
- **Conflict-related sexual violence (CRSV):** Acts of GBV committed in conflict settings, including forced marriage and sexual slavery perpetrated by elements affiliated with a State or non-State armed group, including terrorist organizations.
- **Sexual exploitation and abuse (SEA):** Exploitative actions by humanitarian workers abusing their position of power.
- **Online GBV:** More recent forms of gender-related violence, such as abuse that occurs online or through electronic media and communication technologies.

3.3 Additional Definitions

- **Perpetrator:** A person who commits acts of GBV.
- **Survivor/Victim:** An individual who has experienced GBV.
- **Intimate Partner:** Includes legally married couples, former spouses, cohabiting partners, and dating individuals.
- **Family Members:** Extended family related by blood, marriage, or shared household.
- **Employees:** Individuals engaged in GRT's work in any capacity.

---

4. Vision and Principles

GRT is dedicated to fostering a safe, inclusive environment where all individuals, regardless of gender, are free from violence, discrimination, and fear. The organization envisions a world without

gender-based violence, where everyone has equal rights and opportunities to live with dignity and security. To achieve this vision, GRT's GBV prevention, risk mitigation, and response efforts are rooted in human rights-based, survivor-centered, intersectional, and community-driven principles, ensuring that individuals and communities remain at the core of all interventions. These guiding principles include:

1. **Human Rights-Based Approach** – Recognizing GBV as a violation of fundamental human rights that must not be condoned or justified by cultural norms.
2. **Survivor-Centered Approach** – Ensuring that all interventions prioritize survivors' dignity, safety, confidentiality, and informed consent.
3. **Intersectionality** – Addressing overlapping vulnerabilities, such as gender inequality, disability, race, class, and other systemic barriers that influence GBV exposure and access to services.
4. **'Do No Harm' Principle** – Taking all necessary measures to prevent interventions from reinforcing gender inequalities or exposing individuals to further risk.
5. **Community Engagement** – Actively involving women, men, and marginalized groups in challenging harmful gender norms, fostering gender equality, and promoting positive masculinities.
6. **Trans-Cultural Sensitivity** – Implementing GBV policies while considering local understandings of GBV, cultural and religious contexts, local laws, and traditional practices where GRT operates.
7. **Underreporting and Service Access** – Recognizing that GBV occurs in all contexts but is often under-reported, and ensuring safe, accessible, and quality response services.
8. **Best Interests of the Child** – Prioritizing the protection and well-being of children affected by or at risk of GBV.
9. **Access to Information** – Providing survivors with the necessary information to make informed decisions and exercise their rights.
10. **Strengthening National Systems** – Partnering with local civil society, refugee- and IDP-led groups, and women-focused organizations to enhance GBV response.
11. **Gender Equality and GBV Programming** – Recognizing that gender equality and GBV interventions are complementary but distinct, and that gender equality programming is essential for long-term GBV prevention.

---

5. Core Action Areas

Addressing GBV requires a comprehensive approach across three key program areas: prevention, risk mitigation, and response. Prevention and response involve specialized GBV interventions, while risk mitigation applies to all sectors of GRT's work, ensuring GBV is addressed across all activities. To effectively combat GBV, GRT will implement initiatives in all three areas using a multi-faceted, context-specific approach that includes both direct and indirect service delivery as appropriate. Meaningful consultation with persons of concern, particularly women, girls, and high-risk groups, is essential.

GBV interventions are recognized as lifesaving and must be integrated into multi-year protection and solution strategies, as well as internal and inter-agency planning processes. GRT is committed to ensure effective fundraising to secure adequate resources and implement GBV measures.

GRT will ensure that gender equality principles are embedded in its internal operations, policies, and decision-making structures. This includes promoting a gender-aware culture where employees feel empowered to raise concerns and contribute to the policy's evolution.

5.1 Prevention

Prevention refers to actions that prevent GBV from occurring by addressing its root causes, namely gender inequality, systemic discrimination and unequal power relations between women and men, as well as people with diverse sexual orientation and gender identity. GRT takes a proactive approach to preventing GBV and its key actions include:

- Conducting context-appropriate gender equality and GBV awareness programs.
- Implementing mandatory GBV prevention training for all employees and partners.
- Engaging men and boys as allies in challenging harmful gender norms.
- Empowering women and girls to become strong advocates for gender equality.
- Strengthening advocacy efforts against discriminatory social practices.
- Integrating GBV prevention strategies into all humanitarian and development programs.

5.2 Risk Mitigation

Risk mitigation is an ongoing process that involves specific interventions across all phases of humanitarian programming to reduce GBV risks and enhance safety. It requires targeted actions in every sector and area of work as part of a comprehensive, agency-wide mainstreaming approach. GRT is committed to minimizing GBV risks across its operations by:

- Conducting safety audits and risk assessments to identify potential GBV risks.
- Strengthening coordination and advocacy with local authorities and service providers.
- Implementing policies and procedures that ensure safe, confidential, and accessible reporting mechanisms for survivors.

To effectively integrate GBV risk mitigation into all programming and service delivery, workforce members must understand who is at risk, the sources of that risk, and the potential consequences of action or inaction. Reducing exposure to GBV is a shared responsibility, requiring all staff to proactively assess and address risks within their respective roles.

This process involves key actions in preparedness, needs assessment, strategic planning, resource mobilization, implementation, and reporting. Applying the four elements of protection mainstreaming—safety and dignity, non-discrimination and meaningful access, accountability and participation, and empowerment—across all sectors is critical to mitigating GBV risks.

Furthermore, all GRT workforce members and partners must be trained to safely handle GBV disclosures and make appropriate referrals, whether incidents are reported directly or indirectly. While all staff must uphold GBV Guiding Principles and ensure survivors receive necessary support, case management and related service provision should only be conducted by specialized GBV professionals or qualified Protection staff with relevant expertise.

5.3 Response

Response involves immediate interventions to ensure survivors' physical safety, address health concerns, provide psychosocial support, and facilitate access to justice, following a survivor-centered approach. Delivering multi-sectoral services to all GBV survivors enhances safety, improves physical, mental, sexual, and reproductive health, and ensures justice. All GBV survivors, including those affected by SEA perpetrated by humanitarian workers, have the right to urgent protection and GBV services. Survivors of SEA must receive the same support as those experiencing other forms of GBV. It is important to note that working with GBV perpetrators falls outside the scope of GBV response programming.

A timely and survivor-centered response is essential for ensuring justice and support. GRT within its available capacity and scope of work will:

- Provide immediate access to medical, psychosocial, legal, and security support for survivors.
- Establish clear referral pathways for survivors to access specialized services.
- Ensure GBV cases are handled with cultural sensitivity and professionalism.
- Monitor the quality of GBV response services and improve interventions based on survivor feedback.

<u>The following core actions support the three program areas of prevention, risk mitigation, and response.</u>

Partnerships and Coordination with host governments, persons of concern, international and national NGOs, Red Cross and Red Crescent Societies, UN agencies, intergovernmental and community-based organizations, the private sector, local and women-led organizations, host communities, and faith-based groups enhance protection, assistance, and sustainable solutions. Strong partnerships and effective coordination improve GBV response, reduce duplication, uphold standards, and increase accountability to affected populations.

GRT prioritizes **knowledge and capacity** development for all workforce members, ensuring they acquire the behaviors, skills, and attitudes necessary to promote gender equality and address GBV, including child protection. All employees must complete the appropriate level of GBV e-learning, and GRT will conduct regular and mandatory awareness programs to educate staff on how GBV impacts the workplace. These programs will emphasize the responsibility of all employees to foster a work environment free from intimidation, hostility, offense, and violence.

Training will equip staff with an understanding of the physical, social, and cultural realities affecting GBV survivors, the workplace impact of such violence—including potential effects on productivity and safety risks—and the steps employees can take to mitigate risks and support survivors. Employees will also be encouraged to take reasonable measures to prevent GBV and assist victims in seeking help through Safety Planning.

To ensure GBV prevention is mainstreamed and fully integrated into GRT's operations, managers will utilize recruitment, induction, supervision, meetings, and debriefing as key systems for reinforcing GBV prevention responsibilities. These include:

- Induction Training: A minimum requirement of awareness-raising on the GBV Prevention, Mitigation and Response Policy and specific local procedures for all new employees and those transitioning into new roles.
- Supervision and Support: Employees with direct contact with vulnerable individuals, as well as managers with GBV prevention responsibilities, will receive regular supervision and support meetings to discuss practical GBV-related challenges.
- Capacity Building and On-the-Job Training: Continuous training and development opportunities will be provided to strengthen employees' ability to address GBV-related matters effectively.
- Team Discussions and Open Culture: Regular opportunities for teams to discuss GBV concerns will help foster an open and aware workplace culture, enabling early identification and resolution of issues.
- Debriefing Sessions: These will offer a space to address GBV prevention efforts, share experiences, and discuss any concerns that may arise.

---

6. Roles and Responsibilities in GBV Prevention, Mitigation, and Response

GRT is committed to ensuring the effective implementation of its GBV Prevention, Mitigation and Response Policy through clear roles and responsibilities at all levels.

6.1 Leadership and Management Responsibilities

- **HQ and Regional Representatives:** Hold overall responsibility for ensuring the full implementation of the GBV Prevention, Mitigation and Response Policy.
- **GBV Expert:** Provides technical guidance and support to ensure policy compliance and effective implementation.
- **Coordinators and Managers**:
    - Ensure that all staff and partners are aware of the policy, its content, and their responsibilities.
    - Are responsible for the day-to-day implementation and adherence to GBV prevention procedures in accordance with this policy.
    - Must address GBV-related concerns in a timely and effective manner and ensure survivors receive appropriate support within GRT's existing capacities and scope of work.
    - Must ensure that mandatory internal reporting is in place and effective when concerns of GBV arise.
    - Are responsible for workforce planning, including ensuring the presence of specialized GBV expertise and hiring female staff where appropriate.
    - Cultivate an open and aware culture where employees and others can raise GBV concerns and be assured of a positive and supportive response from management.
    - Provide regular opportunities for informal discussions, listen to concerns, and support employees in emotionally demanding situations.
    - Ensure timely action is taken when concerns about GBV arise, fostering a workplace environment that encourages constructive feedback and open communication.
    - Assess the local management culture in each country of operation to create an enabling environment for effective policy implementation.

- Offer training, access to professional support, and counseling to employees, especially those in high-risk roles or stressful environments.
- Guarantee confidentiality and share reports only on a "need-to-know" basis while ensuring concerns are addressed in a solution-focused manner.

6.2. Employee Responsibilities

All GRT employees are required to:

- Familiarize themselves with the GBV Prevention, Mitigation, and Response Policy and understand internal reporting mechanisms.
- Uphold the highest standards of conduct, promoting gender equality and a workplace free from violence and discrimination.
- Report suspicions or incidents of GBV through established mechanisms.
- Comply with the GRT Code of Conduct, which defines expected behaviors and professional ethics.

6.3. Partners, Contractors, and External Stakeholders

- GRT's GBV Prevention, Mitigation and Response Policy extends to its partners and contractors, raising awareness and defining their legal and moral responsibilities toward individuals vulnerable to GBV.
- While this policy is not enforced upon unwilling partners, it is a core element of GRT's philosophy in preventing GBV. GRT encourages partners to align with these principles and integrate GBV prevention strategies into all project stages (design, implementation, monitoring, and evaluation).
- In cases of GBV concerns involving partners, GRT will assess legal obligations and take appropriate measures, including reporting to relevant authorities if necessary.

6.4. Recruitment and Selection

Recruitment and selection processes are critical in mitigating the risk of GBV within GRT operations. Rigorous procedures will be implemented to emphasize GBV prevention, acting as both a deterrent and a method to identify potential risks. These will include background checks, thorough reference verification, screening for any history of misconduct, mandatory safeguarding training, and adherence to GRT's Code of Conduct to ensure a safe and accountable workforce.
Risk management in recruitment involves:

- A detailed analysis of each job task.
- An assessment of contact levels with individuals at risk of GBV.
- Adherence to the GRT Code of Conduct and principles of safeguarding.

7. GBV and the Workplace

GBV can have significant impacts on the workplace, including reduced productivity, absenteeism, and increased health care costs. GRT is committed to fostering a safe, supportive, and inclusive work environment by

a) Non-Discriminatory and Responsive Policies

GRT is committed to non-discrimination and non-retaliation. Employees will not face discrimination in hiring, staffing, or employment conditions for disclosing their status as a victim of GBV, reporting concerns, or filing complaints. GRT will not retaliate against employees who disclose their status or report GBV. However, GRT reserves the right to act against employees who perpetrate GBV.

b) Safety Planning

GRT will work with victims to develop Safety Plans that include workplace modifications to reduce risks, such as adjusting work schedules, changing locks, or relocating workspaces. When assessing safety risks, GRT will prioritize the victim's judgment on measures that best enhance safety.

c) Leave and Workplace Support

GRT recognizes that employees may need time off for medical, legal, or personal matters related to GBV. Reasonable and flexible leave options will be provided, with a priority on paid leave before requiring unpaid leave. Employees should provide advance notice when possible and contact the designated GBV focal person for leave requests.

d) Resources and Work Performance

GRT will offer community-based resources and referrals for victims, including assistance with Safety Planning, counseling, and legal options. If an employee's performance is impacted by GBV, GRT will provide support and consider all circumstances before taking any performance-related action.

e) Confidentiality

All information regarding an employee's status as a GBV victim will be kept confidential and stored separately from personnel files. Disclosure will only occur when legally required or necessary for safety and administrative reasons, with advance notice to the victim whenever possible.

f) Reporting and Non-Retaliation

Employees who suspect or witness GBV in the workplace should first express concern to the perceived victim and notify a supervisor. GRT will not retaliate against employees who report GBV incidents in good faith. Acts of retaliation, including demotion or withholding pay, are strictly prohibited and subject to investigation.

g) Prohibited Use of Workplace Resources

Employees are prohibited from using workplace resources (phones, emails, computers, or time) to harass, intimidate, or harm others. Violations will be subject to disciplinary action.

h) Court Orders and Disclosure

Employees subject to final court orders or convicted of GBV-related offenses must disclose this information to their supervisor. Failure to disclose may result in disciplinary action. Supervisors will investigate allegations and take necessary actions, including termination if warranted. If an employee self-discloses involvement in GBV, GRT will provide appropriate disciplinary actions and resources for support.

i) Emergency Contact

In case of imminent GBV threats, employees should contact the designated GRT emergency GBV focal point.

j) Responsibilities of Leadership

GRT leadership, including the President and Board, will ensure a GBV-free workplace by enforcing this policy, maintaining open communication, and ensuring employees can report concerns without fear of retaliation. Managers must take appropriate action in cases of policy violations.

k) Reporting and Legal Referrals

GRT leadership must promptly report GBV investigations and actions taken. Failure to act may lead to disciplinary proceedings. If evidence supports GBV allegations, cases may be referred to national authorities for criminal prosecution, following consultation with the Office of Legal Affairs.

---

8. Reporting and Response Mechanisms

- Confidential reporting channels will be established for GBV cases.
- Zero tolerance for retaliation against whistleblowers.
- Immediate and impartial investigations using survivor-centered principles.
- Coordination with national legal authorities where applicable.

---

9. Monitoring and Evaluation

GRT will ensure policy effectiveness through:

- Regular internal audits and GBV program evaluations.
- Systematic feedback collection from staff, beneficiaries, and partners.
- Continuous updates to reflect best practices in GBV prevention and response.

---

10. Accountability and Compliance

- All GRT staff and partners must sign a commitment to this policy.
- Violations will result in disciplinary measures, including termination and legal action.
- Leadership will be held accountable for fostering a workplace culture free from GBV.

---

11. Declaration of Commitment

All employees, contractors, and partners must sign a declaration confirming their understanding and commitment to the GBV Prevention Policy.

The President/Project Coordinator must ensure all employees receive a copy of this Policy and obtain a signed acknowledgment, which will be placed in their official file. They are also responsible for ensuring that employees complete the required training and understand the available options and internal channels for addressing GBV-related concerns.

This policy serves as a comprehensive, action-oriented framework for addressing GBV within GRT operations, ensuring the safety, dignity, and rights of all individuals.