
Case study

Insight

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Turning commitment into action on gender-based violence and harassment prevention

Practical thinking on investing for development

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Introduction

Gender-based violence and harassment (GBVH) remains one of the most challenging workplace issues to address and prevent. Across markets, efforts to confront it have historically been undermined by stigma, fear of retaliation, and reporting systems that retraumatise rather than protect survivors and witnesses.

While many companies have made public commitments to prevent GBVH, there is often a gap between policy and practice, due to limited understanding of how to put effective GBVH risk management measures into place.

At British International Investment (BII), we recognised the scale of the challenge. We set out to make GBVH risk management a core element of responsible investing.

This case study documents how we have translated that ambition into practice by strengthening systems to monitor, reduce, and address GBVH. Based on 15 in-depth interviews with our employees, other development finance institutions (DFIs), GBVH experts, and our investee companies, it also demonstrates how our efforts have influenced DFIs and the private sector more broadly, contributing to sector-wide changes in practices and norms.

Beginning with the UK's 2018 safeguarding push and our early GBVH guidance in 2020, this case study traces the journey from defining our approach to implementation. It outlines our approach, the operational roll-out, the outcomes across our portfolio, and the broader influence on the DFI ecosystem, before concluding with the lessons we've learnt and remaining challenges.

Contents

Introduction	2
Early actions to address GBVH	3
From awareness to survivor-centred implementation	4
Designing key interventions	5
Portfolio outcomes	7
Ecosystem-level influence	9
Challenges and lessons	11
Next steps	12

What is GBVH?

An umbrella term for violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, including sexual harassment.





02

Early actions to address GBVH

GBVH became a high priority for the UK government in 2018. The London Safeguarding Summit in 2018 committed donors, DFIs, and other aid providers to prevent sexual exploitation, abuse, and harassment. At the time, many DFIs had high-level gender policies or general statements on discrimination and harassment. However, there were no practical tools or guidance for assessing GBVH risk and implementing mitigations in operations across emerging markets.

We set out to address this gap in 2020, by publishing a guidance note in partnership with the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD). Titled: [Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector](#), it established common definitions, the business case, and baseline steps for GBVH. However, we soon realised that organisations still needed hands-on support to turn guidance into day-to-day practice. As our Director of Responsible Investing said, the guidance note clarified the “what” and “why,” but investees needed help with the “how.”



BII has embedded GBVH into its core strategy. In 2018, most organisations had gender strategies and policies focused on women’s participation. But not everyone recognised GBVH as a risk to be addressed. There was reference to discrimination and harassment, but nothing specifically on GBVH and, most importantly, how you respond to incidents.

Genevieve Joy
Manager, Responsible Investing,
BII

From awareness to survivor-centred implementation

Following the publishing of the guidance note, we established institutional controls and appointed resources to support integrating GBVH risk management in investments. This focused on applying a survivor-centred approach to GBVH risk prevention and response across investment due diligence and management. In practice, investees were expected to implement minimum policies, ensuring a grievance channel is available and establishing an investigation procedure with relevant trained resources. To strengthen our internal risk management and survivor support systems, we engaged Ergon, a specialist advisory firm on GBVH, in 2021, before extending this support to investees.

What is a survivor-centred GBVH approach?

An approach that prioritises the rights, needs and wishes of people who have experienced GBVH, treating them with dignity and respect, ensuring their safety, maintaining confidentiality, and enabling them to make informed decisions about next steps.

Our increased focus on GBVH influenced investee companies and funds to strengthen their own systems. For example, AgDevCo, a BII investee fund, said it now required each of its portfolio companies to have GBVH processes, such as anonymous grievance mechanisms, in place before investment.

A critical step in improving GBVH response and prevention was to reframe how incidents were viewed. GBVH reporting needed to be understood as non-punitive, confidential, and safe to raise, as well as framed in survivor-centred terms.



An important step that BII has taken to encourage reporting is to make it clear that investees will not be penalised for raising incidents. BII has consistently emphasised that reporting is evidence that GBVH systems are working, not failing - this has helped to reduce scepticism and sensitivities around the issue.

Kirsten Newitt

Director, Ergon

We recognised that incident reporting channels and survivor safeguards needed to be addressed more transparently to enable learning and continuous improvement. From 2020, we introduced a legal requirement for all investees to report GBVH incidents and provided guidance on grievance mechanisms and escalation frameworks. At the time, we were one of the only DFIs to mandate this and to actively encourage investee companies to adopt more open practices around GBVH risk management and reporting.

While this approach shifted how investee companies responded to incidents received, there was need for guidance on “how to run and implement the systems.” The clear prevalence of GBVH issues, along with our observation that many investee companies and investors lacked the specialist know-how, reinforced the need for practical, tailored resources that organisations could run with confidence and that investors could assess in their decisions.



The first phases were very much a response approach... include GBVH in our laws, build our internal sophistication, collect data... but then we moved to prevention and to be more intentional about where we intervene to stop GBVH—through the systems we create internally and the diligence that we do on our investees.

Guy Alexander

Director and Head of ITS,
Responsible Investing, BII



Investees often had questions like “what does a good GBVH policy look like” or “what does a grievance system mean?” Hence awareness through trainings alone wasn’t sufficient and investees needed practical tools and templates to support with implementation’.

Akshara Gopinath

GBVH lead and Executive,
Responsible Investing, BII



04

Designing key interventions

To address the lack of specialist understanding of GBVH, we turned our survivor-centred approach into a set of tangible toolkits, training, and tailored technical assistance. The tools were designed to complement one another. For example, the toolkits were introduced and used during trainings, and tailored technical assistance was deployed following the training, typically supporting companies that needed additional context-specific help. This three-part design helped investees move from awareness to workable systems.

We developed three toolkits to assist with GBVH system and policy implementation:

GBVH policy template

A practical structure for a creating a company GBVH policy that signals commitment and sets out clear roles, reporting, and response procedures.

Integrating GBVH into grievance mechanisms

Step-by-step guidance to weave GBVH considerations into worker grievance systems.

Survivor-centred approach note

An overview of core survivor-centred principles with concrete actions that can be implemented when handling cases.

All three are publicly available under the GBVH topic in our [ESG Toolkit](#). Two respondents said that investees benefitted from the toolkits because it gave them a clear starting-point for GBVH systems, and they could adapt best-practice systems rather than starting from scratch. Investees also described sharing the tools across their portfolios.



The toolkits are among the most useful resources when working with our portfolio companies. Often, when we introduce these topics, they're not yet familiar with the issues or how to implement the required practices. The toolkit gives them a practical starting point, and we then support them in applying it effectively.

Reinett Mogotshi

Sustainability Manager, Africa Infrastructure Investment Managers

97%

of training participants said they found GBVH training useful.

Since 2023, we have trained over 300 people on GBVH across Asia and Africa, alongside our training provider [Social Development Direct](#). At first, we organised one-day (live and online) training programmes that familiarise investees with the toolkits and shared tips for practical implementation. In 2024, acting on feedback, we expanded the training programme to two days carried out in-person across multiple markets. A two-day session allowed for deeper discussion, the introduction of relevant case studies, and for practising GBVH incident investigation skills.

We also played a leading role in working with other DFIs and raised co-funding from Norfund, DEG and Proparco so their investee companies could also participate. Not only did this expand the number of participants, but it also allowed for more diverse perspectives across the programme. In our interview with the training provider, they shared that having mixed cohorts with different roles, including fund managers, portfolio companies, Human Resources (HR), Environmental, Social & Governance (ESG), and executives, strengthened peer learning because teams compared real constraints and real solutions.

Six months after the two-day sessions began, we conducted a set of interviews with a subset of participants. All said they had implemented at least one change in GBVH practice in their organisations post-training. In one example, an Indian company revised its mandatory prevention of sexual harassment policy to be gender-neutral. Also, a company in Ghana introduced additional reporting channels for GBVH, including dedicated phone numbers, suggestion boxes, and grievance/women's committee members across its sites.

The GBVH training provider stressed that context was critical for the success of the sessions. Each session had in-country facilitators who could adapt content and refer to relevant local legislation to make adoption more feasible. These facilitators could provide homegrown examples and deliver in working languages, so the points raised were understood. For example, one company reported that before the training it had tried to handle GBVH from its out-of-country headquarters. After, it started to use local experts and in-country support to manage sensitive issues more appropriately and sustainably.

We partnered with Ergon, a specialist advisory firm, to support engagement with investee companies. This included reviewing policies and procedures, providing technical advice, supporting us with case reviews and responses, and advising on monitoring protocols to ensure processes remained active. Ergon also ran workshops for Environmental & Social (E&S) functions and investment teams at a small number of investee companies. These workshops focused on identifying and assessing GBVH risk, prioritising actions, and responding to incidents. One investee company, Big Basket, described how Ergon reviewed cases each month, ran leadership sessions, and pushed to improve the company's GBVH systems.





05

Portfolio outcomes

Investee companies reported three common changes due to our GBVH support: discussing GBVH felt safer; senior leaders treated it with greater importance; and teams began implementing survivor-centred processes and embedding GBVH in their systems.

Two investees noted how improved GBVH reporting was a sign that conversations on the subject were becoming more commonplace within the organisation. Of the five investees interviewed, four said the training gave them the first safe opportunity to discuss GBVH in a workplace environment. They also said it gave them the language and confidence to raise it with boards, investment teams, and management. According to one fund manager, GBVH was discussed as a risk within the investment team for the first time, whereas people had previously felt uncomfortable raising the subject.

Our training and reporting requirements also ensured added visibility and made GBVH a priority at senior levels. As Adenia, an investee fund, noted, “We would not have done so much GBVH without BII, as they anchored us in prioritising it at a senior level.” Seven of the eight companies and DFIs interviewed said our leadership was important in gaining senior buy-in that would otherwise have taken much longer. AIIM found that bringing our GBVH questions to boardrooms and investment teams was “very fruitful” in prompting learning, reflection, and follow-up actions. Adenia also requested GBVH-specific sessions for the investment team so it could advocate effectively at the executive committee and board level.

Among the five investee companies interviewed, four credited BII as pivotal. Two said the GBVH changes would not have been possible without us, and two said without us their would not have reached the same scale.



Discussing GBVH risk management with our senior management at portfolio companies is essential to reinforce strong controls and a survivor centred approach. BII's training has equipped our investment teams with the confidence and practical tools to engage effectively on this sensitive issue.

Mokgadi Maunatlala
Partner, Adenia Partners

Our toolkits also helped Takura Capital's investees to change their policies and processes (see Spotlight below). AIIM called one toolkit "our go-to" for sharing policy and grievance-mechanism materials across portfolio companies, and for coaching teams on how to apply them in ways that protect survivors. They also emphasised the importance of using careful language, avoiding leading questions, and handling cases with confidentiality and care.

Spotlight Takura

Takura Capital, a Zimbabwe-based private equity firm, participated in our Johannesburg training in 2025, where its attendees identified significant gaps in the company's GBVH policies and processes. The training highlighted the need for stronger controls and targeted training both at the fund manager and portfolio company level. As a result, the company approached us to discuss developing a comprehensive GBVH approach, including training in multiple phases. The first stage was directed at investment teams, followed by tailored support for senior management and board members of portfolio companies.



We were concerned about under-reporting and needed practical ways to address and investigate GBVH. BII's support helped us start at the fund level and then take it to boards and senior management across the portfolio. The training was very effective in raising awareness and has helped us to deal with the sensitive nature of GBVH issues in a standardised and systematic manner.

Portia Chitanda

ESG Executive, Takura Capital

Spotlight Big Basket

Big Basket, India's largest online grocery platform, employs thousands of workers across warehouses, retail and logistics. The company's business model places it at a higher risk for GBVH incidents. We supported its move from policy-only compliance to treating GBVH as a cross-cutting priority built into systems, day-to-day operations, and oversight.

With our technical expert, Ergon, Big Basket's grievance policies and systems were reviewed and gaps identified. Monthly case summaries and feedback helped Big Basket refine processes and embed a survivor-centred approach, while awareness sessions created the space for discussions around GBVH "even at leadership level." Big Basket also ran awareness programmes and sent HR leaders to multi-company trainings to strengthen investigation skills and sensitive case handling. Our regular engagement and support kept GBVH on the management agenda rather than viewed as a one-off workshop or requirement. In our interview with Big Basket representatives, they said that the GBVH support we gave the company moved it from GBVH compliance to day-to-day practices that embedded survivor-centred measures that had gained the trust of its employees.



BII have supported us to embed GBVH as a risk in our organisation, through consistent support over time and by addressing it across the whole organisation. We are well equipped to deal with issues, and we are seeing more incidents, but this does not mean we are doing anything wrong. In fact, we are creating systems and a culture where GBVH can be discussed and reported.

Ashwin Ramaswamy

Head – Centre of Excellence (HR), Big Basket



06

Ecosystem-level influence

We have played a leading role in shaping how DFIs address GBVH, particularly in emerging markets where guidance has been limited and the subject is highly sensitive. By developing toolkits and guidance notes, we have created a foundation of practical resources for the wider DFI community.¹ We have also led and catalysed collaboration between DFIs, securing co-funding from DEG, Proparco, and Norfund to deliver inclusive, multilingual training across 11 countries. These sessions have not only enabled investees from multiple DFIs to participate, but also brought DFI personnel into the room, helping to establish a shared knowledge base and consistent survivor-centred standards. Our leadership and resource-sharing has given other DFIs the opportunity to embed GBVH more explicitly into their due diligence and ESG processes, often helping to overcome internal capacity constraints.

Respondents from DFIs have also said that joint efforts on GBVH training have helped build greater consistency on best practices across the sector, as well as signalling its importance to company leadership. Co-funded training and shared participation has supported a common knowledge base and encouraged open discussion of GBVH among DFIs and portfolio companies. Investee companies are also clearer about DFIs expectations, particularly on including GBVH systems in day-to-day operations. Overall, BII's leadership has been pivotal in driving alignment, clarity, and meaningful action on GBVH across the DFI ecosystem.



It's very important for the DFI community to speak with one voice and clients welcome when we try to harmonise...like apply the same reporting frameworks.

Ludivine Houssin

Technical Assistance Program Coordinator, Proparco



DEG would not have undertaken this work without BII's excellent leadership and core expertise, nor would we have been able to offer the trainings to our clients. We are grateful to BII for steering the process, developing the training concept and materials and recognizing the value of involving DEG and other DFIs as partners.

Martha Hoffmann

Senior Environmental and Social Analyst, DEG

¹ The guidance note has been referenced by the [UK government](#), the [Asian Development Bank](#) and the [Blue Planet Society](#).

Spotlight Norfund



We had just started our journey on understanding how we should work on this topic, and BII had already been at the forefront with their guidance note some years back. They had in-depth knowledge [on GBVH] and we wanted to work with them because they're really strong at implementing; they're great trainers, and just a really good partner.

Andrea Edlund

Associate Environmental and Social Manager, Norfund

Norfund's interview acknowledged GBVH had been emerging as a workplace and governance issue in its portfolio. While there were policies on non-discrimination, GBVH had not yet been integrated into its ESG management system. We invited Norfund to participate in GBVH training, which offered access to tools and specialist expertise. Having multiple investors involved in the training signalled to the market that GBVH was a priority among several DFIs, not just for a single investor. Demand from Norfund's portfolio companies exceeded available places, clearly showing the need for practical, survivor-centred training.



So, we would likely not be able to, at this scale, roll out company trainings in all of these countries without BII. It's likely that we would arrange some kind of training, since we saw a great need and interest, but it wouldn't look like what it looks like now.

Andrea Edlund

Associate Environmental and Social Manager, Norfund

This collaboration enabled targeted shifts, both inside Norfund and with its clients. Internally, Norfund added GBVH clauses to legal agreements, introduced a GBVH screening step before due diligence, and updated portfolio monitoring to capture incidents and support responses. At the portfolio level, investee companies that attended the training adopted practices such as revising codes of conduct and grievance mechanisms. After recognising a similar need, Norfund chose to offer the same tailored support to its own portfolio. Norfund's respondent said that it had also "decided to establish a retainer agreement with Ergon," so its companies could access specialist advice on systems, incident handling, and follow-through when issues arose. The respondent noted that Norfund also valued the multi-DFI model for reducing duplication and promoting consistency for GBVH expectations.



This is really just the starting point. For us, being part of the collaboration has made it possible to act faster and at a larger scale than we could have done alone.

Andrea Edlund

Associate Environmental and Social Manager, Norfund



Challenges and lessons

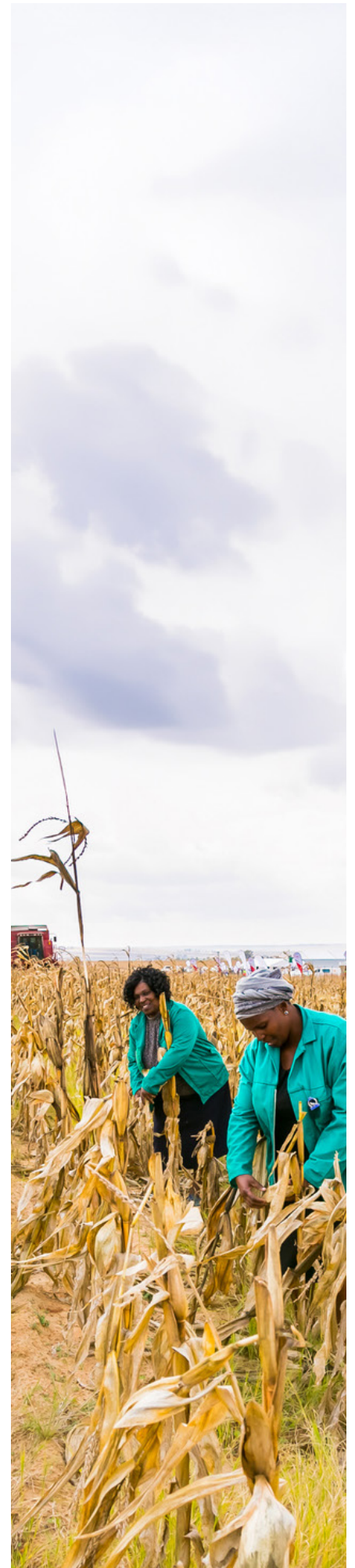
Those we interviewed noted that GBVH was a sensitive issue to navigate, and breaking through stigma and discomfort has been a constant challenge. While the project has already delivered tangible outcomes, interviewees stressed the programme is still evolving. There is further learning to be done on how to best embed processes, track progress effectively, integrate local context, and refine the support given to survivors.

Early implementation proved challenging, and changes have taken time. When this journey started, many companies were not fully aware of GBVH and merely saw it through a compliance lens. Questions around what a credible policy or a grievance system looked like were essential first steps. Big Basket said its compliance had focused on sexual harassment, “but GBVH can go beyond that, like denying opportunities, discrimination, verbal harassment. These are components we hadn’t considered before this work and just didn’t know was part of GBVH.”

At the same time, useable data was scarce because GBVH incidents were hidden or under-reported, making it difficult to determine effectiveness. Training sessions faced resistance and needed careful management and strong context-specific facilitation to maintain engagement. The training provider noted that for these sessions, “good facilitation” and being able to respond to resistance was essential, as “these topics are really quite divisive in the workplace.” As a result, stigma around GBVH made participants less willing to speak openly, which sometimes disrupted learning.

Despite such challenges, the interviews highlighted several cross-cutting lessons, including:

- **Collaboration and resource-sharing improve uptake:** Co-funded, multi-DFI trainings widened reach and let partners pool resources. A collective model enables portfolios to move faster and with more care than a single institution could manage.
- **Consistency and aligned expectations among investors reduce mixed signals:** As more investors asked the same questions and used shared tools, pushback decreased and GBVH expectations became clearer for companies. Interviewees also noted persistent demand for templates and examples to reinforce consistency.
- **Survivor-centred approaches require practical translation:** For example, our Head of Gender noted that companies needed incident forms that avoid identifying details and explicitly “remind” teams what a survivor-centred response entails in each step of the investigation. For example, Big Basket found that generic wellness was not good enough for survivors and integrating counselling into their responses was necessary.
- **Delivering tools as a package was more effective:** Training often established shared good practice and peer learning, while the toolkit provided adaptable policy templates and grievance guidance. Targeted follow-up, such as Big Basket’s integration of survivor-support into response systems and Takura’s phased training across its portfolio, delivered company-specific technical assistance.
- **Creating safe spaces for difficult dialogue is key:** Skilled facilitation that anticipates resistance, uses sector/country-relevant language, and sets clear confidentiality norms made conversations possible. As the training provider said, “one-off trainings are never going to be enough on a topic like this” as overcoming stigma takes time.





08

Next steps

Our experience showed a clear progression from raising awareness to building and implementing the practical systems needed to manage GBVH. We have led by developing practical guidance, including trainings and toolkits, and aligning GBVH approaches with other DFIs. This has enabled companies to translate intent into confidential reporting, safer investigations, and stronger grievance mechanisms. It has also helped by getting senior buy-in and forming clearer expectations across the market. Early results from the interviews conducted point to more open dialogue, better-designed systems, and growing consistency among investors, despite stigma, context specificity, and capacity constraints. Nonetheless, there is still work to be done to strengthen consistency, address stigma, and ensure lasting change.

Looking ahead, DFI interviewees stressed the importance of continued collaboration and cross-DFI knowledge sharing. They also noted the opportunity to involve other emerging market investors and policy stakeholders. As our GBVH project lead acknowledged, “we started as a proof of concept with a few DFIs and didn’t want too many on board at first, but we plan to expand to even more DFIs next year.” The training provider we interviewed pointed to further opportunities to localise content, as we shared our plans to expand access to tailored support, especially for higher-risk situations. Respondents across DFIs and investees emphasised the continued need to work with leadership to sustain buy-in and open discussion. Our Head of Gender and Diversity Finance discussed that integrating GBVH within broader gender, impact, and ESG standards such as the [2X Challenge](#), could embed it more firmly, rather than treating it as a separate issue. On the portfolio side, investee companies prioritised trust, practical support, leadership attention, as well as consistent reporting expectations across DFIs. One fund interviewee noted that these shifts take time because “trust has to be built, so people actually use grievance mechanisms and feel like they will be safe.”

Overall, the interviews conducted have reaffirmed our commitment to supporting this work with care and patience, sustaining collaboration, and strengthening survivor-centred practice over the long term.



The most valuable role that BII has to play moving forward is to continue to position and champion how GBVH risk management is addressed in the private sector in emerging markets at the highest level. Through the persistent vocalisation of the issue at global forums and high-level convenings, it signals that as an investor and as DFIs, that this still remains of material importance to us.

Sonia Jordan-Kirwan
Director and Head of Gender and Diversity Finance, BII

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