

# Prevention of Gender-Based Violence and Harassment at the Workplace

Sustainability  
Recommendation  
Paper



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Trade, Apparel, Footwear & Travel Goods Association in Cambodia





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# Sustainability Recommendation Paper on the Prevention of Gender-Based Violence and Harassment at the Workplace

## Disclaimer

The organizations involved in this paper broadly support the view that Gender-Based Violence and Harassment (GBVH) is an issue in Cambodia, which therefore impacts the garment sector. This paper presents findings related to GBVH; however, it is important to note that not all parties and organisations may agree with every viewpoint expressed. The same applies to the selection of initiatives and projects of companies, development partners, and civil society organisations mentioned in the paper, which are non-exhaustive examples chosen for various reasons, including the ease of access to information for authors. The selection does not constitute an endorsement over other existing examples. Despite any differences, all organizations have put their names and logos on this paper in solidarity. They are

committed to actively participating in resolving the issues outlined and supporting efforts to improve conditions in the garment sector. This collective action underscores their dedication to addressing GBVH and promoting a safer and more equitable working environment in Cambodia.

Findings presented in this paper should not be attributed to any organization without the context of this important disclaimer. The intention of this paper is to facilitate cooperation among various entities representing different stakeholders in the garment supply chain for the greater good. The essence of this paper is collaboration and joint action, and it is anticipated that readers will engage with it in this collaborative spirit.

### Five Key Takeaways:

**Prevalence and Impact of GBVH:** Gender-Based Violence and Harassment (GBVH) is a significant issue in Cambodia's garment sector, with severe consequences for both victims and the economy. Reports indicate that GBVH affects a large proportion of workers and contributes to substantial economic losses, estimated to be 1.3% of Cambodia's GDP in 2023.

**Multi-Stakeholder Efforts:** Addressing GBVH requires collaboration among multiple stakeholders, including government agencies, factory management, buyers, civil society organizations, and trade unions. Each has a critical role in implementing zero-tolerance policies, offering support services, and raising awareness about GBVH.

**Legal and Regulatory Framework:** Cambodia has established several national laws and guidelines to combat violence against women and children, including specific measures for GBVH prevention in the garment sector. However, the enforcement of these laws and the implementation of comprehensive services for survivors need significant improvement.

**Private Sector Initiatives:** Various private sector initiatives by leading brands have been implemented to improve working conditions and address GBVH in factories. These initiatives often involve training, awareness-raising, and establishing grievance mechanisms.

**Ongoing Dialogue and Recommendations:** Continuous dialogue between public and private stakeholders has led to the development of concrete recommendations for improving GBVH protection. Key recommendations include improving reporting and accountability mechanisms, investing in prevention and response services, and ensuring that all stakeholders are held accountable for creating a GBVH-free workplace.



This paper uses the following definition of the ILO Convention No.190 (C190), Article 1(b): “Gender-Based Violence and Harassment (GBVH)” “Violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment.”

# Executive Summary

The Sustainability Recommendation **Paper on the Prevention of Gender-Based Violence and Harassment (GBVH) at the Workplace** addresses important issues of GBVH in the Cambodian textile industry. The document entails comprehensive strategies and recommended actions for various stakeholders, including the government, factories, buyers, civil society organisations, and development partners to combat GBVH effectively.

Through multi-stakeholder dialogues, several significant gaps in awareness, reporting, and mechanisms for preventing and responding to GBVH in the textile industry have been identified. These major findings include:

- **Lack of Awareness and Prevention:** There is a lack of understanding of GBVH among workers and management, leading to underreporting and ineffective prevention measures. Social norms and victim-blaming also contribute to low reporting rates and inadequate support for survivors.
- **Ineffective Mechanisms and Systems:** Existing prevention and response mechanisms are often inadequate, with low trust and delayed responses discouraging reporting and eroding trust in the system. Normalisation of GBVH is also common, coupled with no implementation of zero-tolerance policies at the workplace. In addition, suppliers are hesitant to disclose any GBVH cases in fear of consequences from buyers.
- **Inadequate Comprehensive Services:** Survivors lack information about available services at the factories and in their communities. Often, they could not access legal or psychological support due to inadequate and expensive services.
- **Ineffective Policies and Laws Enforcement:** The national laws, policies, and procedures are in place, but they lack the enforcement to prevent and respond to GBVH in the garment sector.

## Recommended Actions

The paper consolidates recommendations that were made in public-private dialogue events and stakeholder consultations on GBVH in Cambodia over the past years. It also suggests concrete actions to be taken per main stakeholder group to implement the recommendations and move towards new initiatives of multi-stakeholder cooperation. The main ones are listed below:

### 1. Government Actions:

- Improve laws and enforcement mechanisms, ensuring transparency and accountability.
- Various civil society actors promote the ratification of ILO Convention No. 190 to strengthen GBVH prevention and response across sectors (a position which is not supported by TAFTAC).
- Increase investment in public awareness campaigns and comprehensive GBVH services, including legal, health, and psychological support.

### 2. Support to Factories:

- Collaborate with stakeholders to enhance preventive and responsive measures beyond mere reporting, ensuring timely access to services for survivors.
- Buyers should invest in and support suppliers to implement effective GBVH policies, integrating due diligence and collective bargaining agreements into compliance processes.
- Collaborate with stakeholders, buyers, and workers representatives to establish and implement a functional grievance mechanism at the workplace that can address GBVH in a timely and effective manner.

### 3. Support to Buyers:

- Foster collaboration among business partners, government agencies, and civil society to support sustainable development and accountability in the textile sector.
- Utilize platforms like the Responsible Business Hub (RBH) to coordinate and implement aligned strategies.

## The Way Forward

Shared accountability between public and private stakeholders is necessary for the sustainability of the textile industry in Cambodia. Government agencies must take the lead in enforcing laws and policies. Suppliers, vendors, and buyers can support these efforts through increased investment and accountability. Civil society organisations play a crucial role in supporting both government and private sector initiatives. Continued cooperation and dialogue are essential for advancing the GBVH agenda. Platforms like the Responsible Business Hub (RBH) and initiatives by GIZ-FABRIC will support the implementation of the Cambodian Government's Garment Footwear and Travel Goods Sector Development Strategy 2022-2027, ultimately fostering a GBVH-free workplace environment.

To maintain effective GBVH prevention and response in Cambodia's textile industry, the study emphasizes the need for continued investment, enhanced enforcement mechanisms, and multi-stakeholder collaboration.

# 1. Introduction

## 1.1. Background of the Recommendation Paper

The **garment, footwear and travel goods (GFT)** sector is of vital importance to the Cambodian economy. Following the integration of Cambodia into the global trade system, the industry has attracted significant foreign direct investment, particularly from China, and has been the **country's main employer and dominant export sector** for many years. This was enabled by preferential market access for Cambodia to main consumer markets such as the US and the EU, based on Cambodia's status as a least-developed country (LDC). At the same time, with support of the international community, notably the ILO's Better Factory Cambodia programme (BFC), Cambodia aims to ensure good working conditions in the sector that comply with national labour law as well as with requirements of global buyers in the industry.

Over the years, these buyers – mostly international fashion brands – have intensified their social as well as ecological responsibility commitments and various international standards and certifications have emerged to measure and verify their performance. An even more recent trend is the emergence of international legal requirements for industrial players sourcing globally to ensure **human rights and environmental due diligence** across their supply chains. An example for such pieces of legislation is the German Supply Chain Act of 2021, which entered into force in 2023 and significantly expands due diligence requirements for German companies – and accordingly inspires cooperation concerning sustainability in supply chains around the world. On 24 May 2024, the European Parliament also voted to adopt the long-awaited EU Corporate Sustainability Due Diligence Directive (CSDDD) which will be transposed into legislation in all EU Member States and thus further extend the scope and coverage of due diligence requirements.

Against this background, the Cambodian Government launched the **GFT Sector Development Strategy** in 2022. This strategy outlines a comprehensive set of measures that can be taken to support the sustainable transformation of the industry to remain competitive in face of these recent developments. Maintaining the industry's competitiveness is also a high priority as Cambodia is set to graduate from the LDC status to become a lower middle-income country by the late 2020s, which means that trade preferences to markets will be phased out in the medium term. To stay competitive, an outstanding sustainability performance should become the hallmark of GFT products “made in Cambodia”, as it would give buyers continued incentives to procure from Cambodia. This, however, would require a concerted effort of

all relevant stakeholders to make the industry's sustainable transformation a reality.

**German development cooperation** (via GIZ) has supported the sustainable development of the textile industry in Asia and specifically Cambodia since 2014 through various projects on regional, national, and global levels. The relevant cooperation activities in Cambodia are implemented by GIZ under the heading “FABRIC” (Fostering and Advancing Sustainable Business and Responsible Industrial Practices in the Clothing Industry in Asia) which constitutes an integrated implementation structure of various commissions of the German Federal Ministry of Economic Cooperation and Development (BMZ). To support the roll-out of the GFT Sector Development Strategy in Cambodia, GIZ-FABRIC is engaging in **extensive dialogue with public and private partners as well as with civil society** to develop concrete recommendations for action to realise the very ambitious agenda. These efforts included a public-private dialogue event series in 2023 organised in cooperation with the Responsible Business Hub (RBH), which is embedded in the European Chamber of Commerce in Cambodia (EuroCham) and supported by the Cambodia's GFT sector association TAFTAC.

As a result of the continuous dialogue, GIZ-FABRIC along with several partners including CARE, RISE, and individual experts, have prepared **Sustainability Recommendation Papers (SRP) for the Cambodian GFT Sector** on the following topics:

- **Preventing Gender-Based Violence and Harassment (GBVH) at the Workplace**
- Promoting the Inclusion of People with Disabilities into the GFT Sector
- Responsible Wage Digitization in the GFT Sector
- Promoting Textile Waste Management and Recycling in the GFT Sector
- Enhancing Sustainability Reporting in the GFT Sector

## 1.2 Background Gender-Based Violence and Harassment in Cambodia's Textile Industry

GBVH in the workplace is an issue in Cambodia, affecting multiple sectors. A report from unions in 2019 “Women Workers Address Gender-Based Violence in Garment Factories in Cambodia by Solidarity Centre”, illustrated that a majority of interviewed workers experienced verbal harassment or unwanted touching based on their gender, while almost half had unsolicited sexual advances from their



## Beyond personal trauma, GBVH can affect a factory's productivity and ultimately the country's GDP

supervisor. Additionally, over a quarter reported that they were coerced into sexual acts at the workplace. More than a third reported that managers were the perpetrators of GBV, while almost a quarter of respondents reported that the most frequent perpetrators were their peers. Based on CARE's research conducted by the University of Melbourne in 2017, "I Know I Cannot Quit: The Prevalence and Productivity Cost of Sexual Harassment to the Cambodian Garment Industry," one in three female garment factory workers had experienced sexual harassment in the previous 12 months. A 2020 CARE assessment, "Garment Worker Need Assessment During COVID 19", found that these numbers had increased during the COVID-19 pandemic.

Aside from the mental and physical harm GBVH causes victims and communities, the continued gender-based violence and harassment at the workplace also negatively impacts the economy. The cost analysis (conducted in 2015) clearly demonstrated that the total cost of sexual harassment to the garment industry was 89 million USD per year. Significant improvements have been made in social compliance since 2015. However, it is to be expected that this phenomenon continues to impact Cambodia's economy negatively. For example, the consequences of GBVH has led to increased associated costs such as employee turnover and absenteeism. In the above-mentioned study of 2015, it was found that workers take an average of 3.9 days per year off work as a direct result of sexual harassment. At that time, this amounted to nearly 70,000 missed workdays a year across all workers in the sector.

The Solidarity Center's 2023 Global Impact Report, "Eradicating Gender-Based Violence and Harassment at Work," supports the findings of the above-mentioned report. It corroborates that the economic impact of GBVH led to high staff turnover and strained relationships between factory staff and the local community. This economic loss affects not only the factories but also society as a whole.

To properly address and eliminate the issue of GBVH in the workplace, multiple stakeholders need to be actively engaged in preventing GBVH.

Factory management, for example, has a responsibility to implement zero tolerance policies for GBVH in the workplace and is therefore well-positioned to ensure strong GBVH

prevention and response mechanisms are in place for their employees.

Buyers have significant influence (both internally, and via their supplier factories) to affect positive changes in systems and practices, fostering more equitable and safer workplace free of GBVH.

The relevant government agencies include the Ministry of Labor and Vocational Training (MoLVT), the Ministry of Women's Affairs (MoWA), the Ministry of Justice, the Ministry of Health, and the Ministry of the Interior (MoI). Key stakeholders also include the departments of gender equality under MoWA, the Department of Labour Inspection and the Department of Policy and Strategy under MoLVT, and the General Commission of National Police under MoI. These entities have the legal authority to establish and ensure implementation of protective laws and regulations that enhance the framework for GBVH prevention and response.

Civil society organizations can assist by offering prevention and response services, providing legal and health counselling to survivors, and raising general awareness about GBVH in collaboration with government agencies.

Additionally, trade unions play a crucial role in GBVH prevention. They contribute to public awareness efforts, monitor the implementation of GBVH prevention measures within factories, and advocate for the rights of their members—the factory workers.

## 2. Existing Government and Sector Initiatives

### 2.1 Legal and Regulatory Framework and Government Initiatives

Cambodia has developed multiple national laws and guidelines to address Violence against Children (VAC) and Violence against Women (VAW). These include the Law on the Prevention of Domestic Violence and the Protection of Victims (2005), the Law on Suppression of Human Trafficking and Sexual Exploitation (2008) and its Explanatory Note, the Labour Law (1997), the Education Law (2007), the Law on the Protection and Promotion of the Rights of Persons with Disabilities (2009), the Inter-Country Adoption Law (2009), the Penal Code (2011), and the Juvenile Justice Law (2016). In addition, the Five-Year National Strategic Plan 2019-2023 (Neary Rattanak V) and the Five-Year National Action Plan on Violence Against Women 2019-2023 (NAPVAW), both led by the Ministry of Women's Affairs (MoWA), have been developed and implemented.

While important legal pillars are in place, the regulatory framework could be further strengthened to ensure more effective protection from GBV. The **“Cambodia Garment, Footwear and Travel Goods (GFT) Sector Development Strategy 2022-2027”** was officially launched on 21 March 2022, aiming to transform this sector into an environmentally sustainable, resilient, and high value-added industry, further developing Cambodia's economic diversification and competitiveness. Reducing GBVH in garment factories is a key strategy to an inclusive and sustainable sector transformation, e.g. the establishment of grievance mechanisms is specifically mentioned as a GBVH prevention instrument.

In response to GBV, Cambodia's government has developed multiple guidelines for national and sub-national government agencies to support and respond to GBV survivors' needs on the ground. These guidelines include:

- **Referral Guidelines** for Women and Girl Survivors of Gender-Based Violence (2016)
- **National Guidelines** for Managing Violence Against Women and Children in the Health System (2014)
- **Minimum Standards** for Basic Counselling for Women and Girl Survivors of Gender-Based Violence (2016)
- **Minimum Standards** for Alternative Care of Children (2008)
- **Clinical Handbook** for Responding to Intimate Partner and Sexual Violence (2014)
- **Clinical Handbook**, Healthcare for Children Subjected to Violence or Sexual Abuse (2017)
- **Handbook for Commune Committees** for Women and Children (CWCC) (2017)

Despite these guidelines and standards, **more than 50% of GBV survivors** in Cambodia reported that they did not seek help or access social services provided by stakeholders. This finding was highlighted in the latest Cambodia Demographic and Health Survey 2021-2022, a joint survey by the National Institute of Statistics and the Ministry of Health, published in 2023. This aligns with a global report by the ILO's Lloyd's Register Foundation, which indicated that around 50% of GBVH survivors do not trust the existing systems for GBV prevention and reporting at their workplace.

### Many survivors of GBVH don't trust the existing support system

Since supply chain legal frameworks in some European countries have changed, suppliers are under increased pressure to comply with human rights due diligence standards. As a result, many producing countries, including Cambodia, have adopted good practices. These include **implementing grievance mechanisms, integrating zero-tolerance policies for GBVH in human resource manuals, and focusing on general worker well-being**. Leading manufacturers and brands frequently collaborate with local or international NGOs to support these efforts. Below are some examples of private sector initiatives in Cambodia. This is not an exhaustive list but a selection that the authors were aware of due to their collaboration and presents a sub-set of ongoing activities:

### 2.2 Private Sector Initiatives

Worker Wellbeing programming. One of the leading brands focuses on training on: Sexual & Reproductive Health, Maternal & Newborn Health, Financial Literacy, Nutrition & Hygiene, Sexual Harassment Prevention and HIV/AIDS mainstreaming in the workplace. From 2023 they focus more specifically on worker

wellbeing which includes mental health. This new program was rolled out in several countries including Cambodia.

Another leading brand is improving gender equity by using approaches such as amplifying women's voices and leadership, promoting responsive health and well-being, and encouraging male engagement. To ensure an equitable hiring system and prevent discrimination, an internal human resource policy was implemented at participating factories.

The program works with brands and factories on promoting gender equality and preventing GBVH especially in around 270 key factories. In 2021, BFC and CARE developed 'Guidelines for Addressing Gender Based Violence and Harassment in the Textile, Garment and Footwear Manufacturing Industry'. The Guidelines explain to all garment industry businesses – including factories, manufacturing groups, vendors, licensees, agents and buyers – what to do to prevent and respond to GBVH in the world of work. The Guidelines were developed to encourage all garment industry actors to implement ILO Convention 190 and Recommendation 206 on Violence and Harassment.

Another leading brand works across several Asian countries with a program that contains the following components:

### Key Initiative Elements:

**1. Social Protection and Rights at Work:** This training will help workers understand the various social protection schemes and benefits available, along with eligibility requirements and how to access these schemes. Additionally, it will develop core skills to help mitigate the long-term economic impact of COVID-19.

**2. Gender-Based Violence and Harassment (GBVH):** Guided by CARE's Gender Equality Framework, the program aims for gender-transformative outcomes. This will be achieved by empowering female garment workers through education on gender roles and norms, respect for women's rights, and prevention of GBVH in factories. This includes awareness raising, education, and building or enhancing referral and complaint mechanisms in factories.

**3. Human Rights Environmental Due Diligence (HREDD):** The HREDD process requires businesses to thoroughly evaluate their supply chains to detect and prevent human rights abuses and ensure compliance with relevant laws and standards. The

goal is to maintain high accountability across the garment industry and supply chains. As part of this project, CARE will pilot a training program in two volunteering garment factories to strengthen their capacity for complying with the HRDD process.

A US-based leading brand in footwear is building other Worker Well-being Program. Besides the focus on Women's Empowerment and Ethical Supply Chains, Workers Protection and Addressing GBVH are key focus areas:

*"Workers should be protected by inclusive national policies which recognise their rights and protect women from gender-based discrimination and abuse. Raising awareness among policymakers and factories will build support for progressive, effective labour laws and supply chain regulations"*

This brand also specifically addresses Gender-Based Violence and Harassment (GBVH) by educating workers on gender roles and norms and preventing gender-based violence and harassment in factories. This is achieved through awareness raising, education, and building or enhancing referral and complaint mechanisms in its factories.

A European leading brand developed its own program based on the well-known STOP model, originally designed by CARE. This model was implemented in several Southeast Asian countries. The specific objectives of that program are 1) Garment factories have effective workplace mechanism to respond to sexual harassment. 2) Garment factory workers feel safe to report sexual harassment free from negative consequences. 3) Increased engagement with key stakeholders to improve conditions for women working in the garment industry.

### At the end of the program the evaluation showed:

- The factories improved their knowledge and skills in implementing the sexual harassment policy through a series of trainings and ongoing technical coaching.
- 86% of all factory workers (2,810 workers; 2,184 women workers) received training on sexual harassment prevention.
- Most workers improved their understanding of sexual harassment-related behaviours and their impacts. During the focus group discussion, they reported that they were confident to report cases to their factory's Sexual Harassment Prevention Committees.
- Key government stakeholders, including the Ministry of Labour and Vocational Training (MoLVT), Ministry of Women's Affairs (MoWA), Ministry of Interior (MoI) and Ministry of Justice (MoJ), were strategically engaged in a

high-level dialogue preventing GBVH in the garment industry.

- Participants shared their collective efforts and commitment to continuing the journey of eliminating GBVH in the world of work and committed to supporting the process of ratifying ILO's Convention No. 190 (Violence and Harassment)

One of the early support programs for female workers in Cambodia was initiated by a US-based brand in 2009. Their specific program that has been rolled out in several Southeast Asian countries aims to provide female garment workers with the skills necessary to fulfil their potential and aspirations both in the workplace and in their personal lives. A key part of the program is addressing gender equity and gender-based discrimination, including aspects of violence and sexual harassment.

In 2023 this brand reported: "84% of our factories have prevention and response management systems in place to address gender-based violence. 91% of factories have functioning grievance mechanisms for complaints and suggestions, including gender-based violence and harassment."

The brand also set up an initiative to enforce their zero-tolerance policy on physical, psychological, and sexual harassment. The program helps their facilities raise awareness of gender-based violence, invest in preventing and addressing the issue in the workplace, and use their prevention and response spectrum to identify, address, and remediate issues immediately.

### 2.3 Development Partner and Civil Society Initiatives

There are many good examples of how development partners and civil society organisations address GBVH at workplaces in Cambodia:

#### Better Factories Cambodia (BFC)

The Better Factories Cambodia (BFC) program started operating in Cambodia in 2001 and is a partnership between the International Labour Organization and the International Finance Corporation. As part of the Better Work program, BFC engages with workers, employers and the Royal Government of Cambodia to achieve improved working conditions, health and wellbeing of garment workers, while at the same time strengthening the national industry via increased capacity and productivity in garment factories. With a current coverage of around 650 factories and 650,000 workers, BFC collaborates closely with the industry stakeholders at multiple levels of the

supply chain to create sustainable and practical solutions for all and supports enterprises in implementing the ILO core international labour standards and Cambodian labour law.

#### CARE Cambodia: Enhancing Women's Voice to Stop Harassment (STOP)

STOP grew out of CARE's GBVH prevention work in Cambodia and has since been replicated in Laos, Myanmar, Vietnam, and Ethiopia. The project takes three main approaches to combating GBV in factories. First, STOP collaborates with 22 garment factories (employing 38,859 workers, 33,108 female) to develop effective workplace policies and mechanisms for preventing and remediating cases of GBVH. Second, STOP supports female garment workers to elevate their voices in factory-level GBVH policy debates and report cases of GBV that occur. Third, STOP advocates for the introduction of stronger laws, policies, and mechanisms for preventing GBVH in the national regulatory environment of the garment industry. With the STOP project, CARE worked collaboratively with factories to establish Anti-Sexual Harassment Policies at factory level and support them to set-up Anti-Sexual Harassment Committee responsible for the prevention and response to GBVH. CARE also provided training to target factories, Anti-Sexual Harassment Committee Members, and workers on how to report and respond to cases.

#### "Promoting Sustainability in the Textile and Garment Industry in Asia" (FABRIC) (Source here)

The FABRIC project (Promoting Sustainability in the Textile and Garment Industry in Asia) works with partners for a competitive textile and garment industry that is fair for people and respects the environment. The project leverages networks to create solutions for a sustainable garment and textile industry. It identifies the common interests of key actors – in the factories, ministries, civil society and international brand manufacturers – and brings them together with the aim of developing a shared vision of sustainability and promoting greater cooperation.

Acting as a think tank, the project creates a pool of knowledge from successful sustainability initiatives in individual countries and disseminates that expertise across the wider region. In cooperation with global initiatives, it works with industry stakeholders towards adopting a joint position on sustainable production criteria. The project operates in Bangladesh, Cambodia, Myanmar, Pakistan and Vietnam also works with China.

#### Solidarity Center

Solidarity Center works with Cambodian unions and other allies to protect and advance worker rights through training



and support, including legal advocacy. Their efforts help workers stand up for their rights and demand living wages and decent working conditions. This support includes helping unions grow and strengthen by developing organizing, collective bargaining, and advocacy strategies. Additionally, they tackle injustices and promote equality and inclusion through programs that focus on access to social protection, migrant worker rights, and addressing gender-based violence and harassment in the workplace.

The trade unions, ILO C-190 working group, CARE and the BFC program have joined in a coalition to jointly advocate for the ratification of ILO convention 190 since 2022.

## 2.4 Good Practices from Other Countries

There are many regional initiatives where the private sector and civil society organizations collaborate to reduce GBVH in the textile industry across South Asia and Southeast Asia. Many projects integrate zero-tolerance policies for GBVH into factory human resource management manuals and strengthen internal complaint mechanisms. However, these measures alone are not enough to ensure that victims feel safe reporting cases of violence. Workers' empowerment and awareness among rights holders are crucial.

There is no one-size-fits-all solution, but reducing GBVH in the workplace requires government initiatives to establish supportive legal frameworks and policies, the private sector to anchor zero-tolerance policies for GBVH, and civil society

organizations to provide prevention and response services within factories and surrounding communities. Below are some examples illustrating that reducing GBVH in the garment industry requires joint initiatives from civil society organizations, the government, and the private sector.

### **Vietnam, Laos and Myanmar - CARE Made by Women Initiative promoting the STOP Model (Source here)**

Made by Women (another STOP Model Project) is a CARE initiative that empowers and protects women garment workers and promotes ethical supply chains. Through their advocacy and engagement work with both workers and other industry stakeholders, Made by Women has strengthened government and factory policies towards protecting workers from GBVH as well as informed thousands of garment workers of their right to work in a dignified and harassment-free workplace. Forty-two factories participated in "Made by Women", reaching 96,000 female workers. As a result, 35 factories adopted a sexual harassment policy, 40 factories set up a sexual harassment prevention committee and impact analysis showed that female workers reported experiencing less sexual harassment. For example, in Laos a decrease was noted from 1 woman out of 6 experiencing violence to 1 out of 20.

### **Bangladesh**

#### **GBV Prevention Dialogues – Bangladesh (Source here)**

In partnership with the Bangladesh Center for Workers Solidarity (BCWS), the German organisation FEMNET established dialogue between brands, retailers, suppliers, and workers'

rights organisations in Bangladesh to jointly address GBV in the garment sector. In addition to this, BCWS and FEMENT also compiled recommendations that each of the stakeholders and the Government of Bangladesh could implement to further prevent and protect garment workers from experiencing GBV in the workplace.

#### **EKATA Model - CARE Bangladesh (Source here)**

The Empowerment, Knowledge, and Transformative Action (EKATA) model is a program structure developed by CARE Bangladesh to empower female garment factory workers. Within this model, female garment workers form groups of 25-30 individuals and receive 9 months of training and capacity building on topics related to leadership, labour rights, GBVH, and working with management. Different EKATA women's groups are then connected to form a Community Worker

Association and register as a union. This multilevel model ensures that individual female factory workers receive essential training on their right to a safe and harassment-free workplace. It also benefits the entire community of garment workers by increasing the participation of women in labour rights forums.

#### **Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act – India (Source here)**

In 2013, India passed the “Sexual Harassment of Women at the Workplace Prevention, Prohibition, and Redressal Act”. This was a significant step towards GBV prevention as it outlined different forms of harassment and detailed how to seek help in cases of harassment. Though not yet fully enforced, the Act gives local labour rights organisations a legal framework with which to further advocate for the prevention of GBV at work.



## 3. Key findings from Stakeholder Consultations

### 3.1 Stakeholder Consultations and Dialogue on GBVH

Improving the situation regarding GBVH in workplaces within the Cambodian textile industry has long been a topic of discussion.

The **Responsible Business Hub (RBH)** has been at the forefront of this **dialogue process**. The RBH is hosted by EuroCham and TAFTAC, in partnership with the Ministry of Labor and Vocational Training (MoLVT), the Ministry of Women's Affairs (MoWA), other government stakeholders, as well as BFC, RISE, CARE, and GIZ. The goal of the RBH is to build a sustainable textile industry aligned with the Cambodian Government's Garment, Footwear, and Travel Goods Sector Development Strategy for 2022-2027.

Addressing GBVH in the workplace is crucial for **improving working conditions and worker welfare** and is highly relevant for **promoting further investment into Cambodian industry**. The multi-year dialogue facilitated by the RBH, between various public and private stakeholders has produced important **recommendations for enhancing GBVH protection**.

For example, in February 2023, the RBH, hosted by EuroCham and TAFTAC, held a Public-Private Dialogue (PPD) titled **"Preventing Sexual Harassment in the Workplace - Awareness Raising, Guidelines, and Best Practice."** The event included key stakeholders from the government, development partners, civil society organizations, and the private sector. It consolidated key recommendations from these stakeholders, which are reflected in Chapter 4 of this paper.

For the drafting of this paper, CARE conducted additional interviews with key informants from the different stakeholder groups following the PPD event in 2023. Key government ministries representatives from MoWA, MoH, MoLVT, and MoI were interviewed as well as HR managers of garment factories, executive directors and senior management and technical staff from relevant CSOs working on GBVH in garment sector.

In addition to the previous steps, a **consultation and feedback workshop** with all relevant stakeholders was organized in March 2024. Hosted by GIZ-FABRIC, CARE and RISE with the support of RBH the workshop gathered feedback on the documentation of major recommendations collected from previous stakeholder dialogues, including ongoing collaboration, dedicated dialogue events, and stakeholder interviews. The workshop used guiding questions to refine the recommendations, focusing on: (i) **how to ensure better use of grievance mechanisms for GBVH prevention**, (ii) **how to get**

**factory management on board for effective GBVH reporting**, and (iii) **how to ensure budgeting of support services for GBVH survivors**.

### 3.2 Major Findings

The following challenges can be presented as key topics on how to improve GBVH protection:

#### Lack of Awareness & GBVH Prevention

The level of understanding of GBVH among most workers, unions, middle management, and top management at factories remains a challenge. Existing definitions of GBVH in these settings only include cases of serious physical harassment and abuse. This causes other forms of GBVH, such as verbal, psychological, and economic forms of abuse and exploitation to be overlooked.

- **Social norms and victims blaming** remain root causes for low rates of GBVH reporting and accessing services. Survivors experience discrimination when disclosing their identities as survivors at work, home, and in their communities.
- There is not **enough civic space** for workers and unions to have a **dialogue around GBVH** and other rights related topics.
- There are **not enough public awareness materials** about GBVH widely available at factories and in the community. In contrast, the extensive advertisement of alcohol in public spaces has been found to be correlated with increased cases of GBVH, both in the community and the workplace.

#### Ineffective GBVH Mechanisms & Systems

- **Inadequate prevention and response mechanisms** in place at factories and in the community.
- **Low trust by survivors** in existing mechanisms in place at factories and in the community.
- **The delay in responding** to reported cases is common both at factories and in communities. This further discourages reporting cases and erodes the already low levels of trust in existing mechanisms and systems.
- **The normalisation** of different forms of GBVH is common. In many cases, no zero-tolerance policy is applied when normalised types of GBVH occur. More commonly, the few cases that are remediated are done so outside of the formal system, where survivors may be

offered compensation money or other incentives to help them “move past” the incident. These cases are not recorded in factory data systems tracking GBVH.

- **Supplier hesitance in disclosing GBVH cases** for fear that their contract with the buyer will be terminated. This is a huge and persistent barrier to GBVH prevention in the garment sector.

### Inadequate Comprehensive Services

- **Survivors are poorly informed** about the available services both at factories and in their communities. Survivors struggle to find the full package of services and support they need for immediate and long-term recovery and rehabilitation.
- **Survivors experiencing mental health** problems and psychological needs related to GBVH do not have access to the specialised services they require.
- **Legal services are too expensive** for survivors. Most survivors decide not to pursue cases in the formal court system for fear of extra payments and additional costs beyond the formal court procedure.

### Ineffective Policies and Laws Enforcement

- **Inspections and monitoring** at factories should be conducted in an effective and transparent manner. The national laws, policies, and procedures are good guidance for all stakeholders; however, the implementation of those laws, policies and procedures have yet to be effective in preventing and responding to GBVH in the garment sector..

## 3.3 Areas of Consensus and Disagreement

There is consensus that GBVH awareness raising mechanisms, prevention mechanisms and response services for survivors need further improvement and investment. There is also broad agreement **that all stakeholders must be held accountable** to achieve a GBVH-free garment sector in Cambodia.

The stakeholders acknowledged the negative impact and high cost of GBVH on productivity and cost of the whole sector remains high. Effective prevention and response to GBVH are the most efficient solutions to address this by all key actors in the industry.

The discussions showed that opinions differed regarding the quality and availability of the GBVH services. They are seen by service providers as adequate while survivors, workers, and unions say they are insufficient. Services mapping and referral mechanisms are needed at the factories and nearby communities where the workers can get simple and timely to them.

Furthermore, advertising of alcohol in the country remains popular. Alcohol is widely accessible and even “cheap” for the population. There have been very few actions taken to reduce alcohol consumption (or to educate on its linkage to GBVH) despite it being a significant contributing factor to GBVH in factories and communities. More attention could be paid to this topic.





## 4. Recommendations

GBVH at workplaces is a Shared Responsibility and should be treated as such. There is a need for collaboration and shared responsibility among all stakeholders, including the state, the private sector, civil society, factory's management and workers themselves. This includes developing collective collaboration to create an enabling environment for workers, empowering women entrepreneurs, and creating a mandatory framework for preventing and addressing sexual harassment in larger companies. This recommendation was shared by the CWEA, the MOWA, the MLVT, the trade unions, and the GIZ FABRIC.

### 4.1 For the Government

#### Improve Reporting and Accountability Mechanisms:

Several stakeholders highlighted the importance of establishing clear reporting and accountability mechanisms for addressing sexual harassment in the workplace. This can be addressed by building a structure or mechanism for reporting, acting and being consistent with leadership support and developing legal instruments and referral guidelines for survivors. This recommendation was shared by MOWA, the NGOs, as well as legal and private sector representatives.

Given the **gaps in the implementation of the law** identified by the legal analysis and qualitative findings of this report, prioritising the activities identified in the "Multi-sectoral Coordinated Response Mechanism," the "Effective Police Protection" and "Legal Aid and Access to Justice" sections, all of which are well aligned with the National Action Plan on Violence against Women (NAPVAW) will be key:

- **Develop a coordinated response mechanism** between ministries, institutions, service providers, civil society, the private sector, and other key actors to promote a coordinated prevention and response strategy at the national level and to build knowledge and skills.
- **Clarify operational standards and codes of conduct**, review and share at all levels to promote improved police response to violence against women.
- **Legal and justice reform process** should consider and discuss violence against women as a key issue.

**Promote Awareness and Training** – The importance of awareness raising and training on the issue of sexual harassment in the workplace, including training for managers and employees at all levels, and disseminating information on the rights of workers to live and work free from harassment cannot be overstated and these initiatives should be supported.



This recommendation was shared by the CWEA, the MoLVT, the NGO's, the Legal/Private Sector, and others. Given the **gaps in the lack of awareness and prevention of GBVH** and its impacts on women's well-being and workforce productivity, it is crucial to focus on activities identified in the "Community and Workplace" and "Capacity Building" sections, also highlighted in the NAPVAW:

- **Promote safe, harassment-free**, and respectful public and private workplace environments by raising awareness of labour rights. Work with employers to ensure policies and mechanisms to prevent and respond to workplace harassment are implemented.
- **Promote sensitization towards GBVH** with all key actors and increase the capacity of all key actors to understand the physical, psychological, and financial impact of violence against women.
- **Develop more public awareness** materials for GBVH and make them easily accessible in the community and workplace.
- Reduce the advertisement of alcohol in any public spaces or on social media, and improve efforts educate the population on the link between alcohol consumption and GBVH.

### 4.2 For Factories

**Factories should invest in training and awareness to acknowledge the existence and prevalence of GBVH and aim to create „GBV & harassment-free factories.“** They should develop or adopt and implement workplace-level policies in line with international best practices to prevent, respond to, and monitor GBVH. Management and staff should be trained on GBVH, gender equality, and bystander

intervention to ensure the policy is understood and effectively implemented. Workers need awareness of the workplace policy, their rights, and their responsibility to report incidents to designated management staff.

- **Factories should implement a zero-tolerance policy on GBVH**, including the creation of a reporting and accountability mechanism and organising awareness raising sessions for all factory management and employees. This policy is a priority need of all workers, particular women workers, to create a safe working environment. This should be created with consultation and technical support from an organisation with expertise on this topic. It is important to task appropriate employees with responsibility and expertise in addressing GBVH and creating cultural change so that GBVH is no longer tolerated. This may involve establishing a GBVH committee or explicitly and publicly tasking an existing committee or individuals with this mandate. This can be supported by creating linkages, dialogue, and reporting mechanisms (where appropriate) between other workplace and community stakeholders, such as unions, commune authorities, landlords, and police to address and prevent sexual harassment that occurs both inside and outside the workplace.
- **Factories could collaborate closely with technical support from a gender experts or women rights organisations**, to annually review their Code of Conduct and make appropriate additions or changes. It is highly recommended to amend the Code of Conduct to include a clause on staff well-being and creating a safer working environment, including protection from any form of GBV, verbal abuse and sexual harassment. Employees and other stakeholders should be fully informed of all changes to the Code of Conduct. A referral guidebook (mapping out all available and accessible services) available at factories could help to increase access to legal aid and health care for survivors.

### 4.3 For Buyers

It is key for buyers to coordinate with suppliers and retailers to adopt international standards of responsible investment with regards to sexual harassment and reflect this commitment to international standards through monitoring and auditing protocols. Buyers wield significant influence over practices within supply chains, particularly the working conditions and worker's well-being, so they should proactively make GBVH a preference in the Due Diligence process and put **Collective Bargaining Agreements (CBA)** as one of

the criteria for compliance for suppliers. Possible activities could be:

- **Adopt a workplace policy on GBVH** that includes the formation of Anti-GBVH Committees with external experts and make sure that suppliers implement it.
- **Analyse risk factors for GBVH** and take appropriate action to mitigate these risks (including risk factors related to purchasing practices and factory-level supervisory and employment practices).
- **Provide incentives** that promote reporting by workers without fear of retaliation while accountable to survivor's needs by providing appropriate support to GBVH's survivors' needs.
- **Provide information and training** on the identified hazards and risks of GBVH and the associated prevention and protection measures both to workers and management. Involve trade unions, especially women-led unions, as well as membership-based women's rights organisations in all the above-mentioned processes as well as in social audits and the formulation of corrective action plans.

### 4.4 For Civil Society

Civil society needs to proactively and collaboratively work with relevant actors to ensure representation of women in factory committees and union structures so that women's voices and experiences of GBVH are brought to the forefront as a workplace issue. More women in these structures allow for targeted feedback to factory management actions and timely responses related to GBVH. A possible mechanism would be setting targets for women's membership on committees.

- CSOs should **continue to provide technical support** based on their expertise. Services should be made available for all relevant stakeholders including unions, factories, government, business to promote a GBVH free workplace environment.
- CSO should be **part of public campaigns** to raise awareness and social dialogue concerning GBVH, and support women-led unions with both capacity building and by ensuring GBVH is incorporated into Collective Bargaining Agreements.
- Civil society can play a **stronger role endorsing and engaging** with public campaigns which aim to promote respectful relationships, change harmful gendered social norms, and engage all community members to intervene in GBVH and particularly support unions and government to ratify the ILO Convention 190.

## 5. Recommendations to Action

To successfully reduce GBVH at workplace in the garment sector specifically, government, suppliers and factories, civil society organisation and development partners must collaborate. Everyone has a specific role to play:

### 5.1 Actions by the Government

- **Improve the laws for accountability mechanisms** and ensure meaningful policy enforcement, e.g. effective and transparent inspection and make a summary report available to the public.
- **Various stakeholders and civil society actors promote the ratification of ILO Convention No. 190**, as it will become an effective prevention and response mechanism for GBVH in all sectors including the textile industry in Cambodia. It should be noted that TAFTAC does not support this point.
- **Invest more** on awareness materials and **proactively promote GBVH** prevention efforts in public and private sectors.
- **Coordinate with multi-government agencies** to reduce the advertisement of alcohol in the country.
- Invest more on **providing comprehensive GBVH specialised services** (legal, health and psychological service) to meet the needs of survivors, for both, immediate and long-term recovery interventions at communities and factories.
- **Enhance collaboration** with unions, factories, CSOs, buyers, and other key actors to improve existing GBVH prevention and response services. All these stakeholders can support the government's strategies to achieve a GBVH-free textile industry where it is relevant to their capacity, expertise, and resources. This could be done through co-creation processes and joint action plan implementation.

### 5.2 Support to Factories

- **Relevant government agencies**, such as the Ministry of Labour and Vocational Training should collaborate with CSOs and experts specializing in GBVH in the garment sector. They should support factories in improving preventive and responsive mechanisms, beyond just reporting, and focus on comprehensive services for survivors to ensure easy and timely access in factories and communities.
- **Buyers should invest more** and be accountable for GBVH survivors' needs. They must **ensure their suppliers have the resources and capacity** to implement effective policies and systems beyond mere compliance. Additionally, buyers should **integrate due diligence processes and collective bargaining agreements (CBA)** into compliance and provide suppliers with the necessary resources to implement these regulations effectively.
- **Collaborate with stakeholders, buyers, and workers representatives** to establish and implement a functional grievance mechanism at the workplace that can address GBVH in a timely and effective manner.

### 5.3 Support to Buyers

- **All business partners, government agencies, and CSOs** should **collaborate to support** buyers in contributing to the **government's strategies for sustainable development** and accountability. This collaboration aims to promote worker well-being and create a GBVH-free workplace in Cambodia's textile sector. Key stakeholders should invest based on their expertise, capacity, and resources, and implement programs that align with government policies and strategies. The Responsible Business Hub (RBH) could serve as an appropriate platform, along with other national partnerships for sustainable textiles.



## 6. Conclusions & Way Forward

### 6.1 Summary of Main Points

The sustainability of the textile industry is a shared responsibility between public and private stakeholders. Government agencies are the primary actors responsible for ensuring efficient and effective enforcement of laws and policies to achieve sustainable development in the sector. They should also invest more in prevention measures and provide comprehensive GBVH services for both immediate and long-term needs, ensuring these services are accessible in workplaces and communities. Suppliers, vendors, and buyers should join the government in implementing national regulations and strategies by increasing their investments and being accountable for their roles in sustainable development and social responsibility. Civil society organizations and development partners should continue supporting government agencies at both national and sub-national levels, as well as the private sector. They should particularly support unions and workers in eliminating GBVH and ensuring effective services for survivors and communities, leveraging their capacity, expertise, and resources.

### 6.2 Way Forward

As the paper has shown, there is a legal and regulatory framework for GBVH prevention and response mechanisms, and there is some awareness of the importance of this topic among all stakeholders. However, more investment is needed to ensure efficient and effective law and policy enforcement, implement prevention measures, and provide comprehensive GBVH services for immediate and long-term survivor needs in workplaces and communities.

The private sector should join the government in implementing national regulations and strategies by being accountable for their roles in sustainable development and social responsibility. Currently, GBVH enforcement mechanisms are often weak, and the private sector's willingness and/or ability to provide sustainable solutions is limited.

Continued cooperation is needed to support the government, brands, and factories in advancing their GBVH agenda in Cambodia. A crucial element in this effort will be ongoing multi-stakeholder dialogue to provide updates, exchange best practices, address remaining issues, and coordinate joint actions.

**GIZ-FABRIC, commissioned by BMZ**, is a key stakeholder providing a platform for such dialogue in Cambodia, along

with their partners at the Responsible Business Hub (**Euro-Cham and TAFTAC**) and in close cooperation with **ILO-BFC and civil society partners**. This public-private dialogue aims to holistically **analyze issues and develop new approaches to support the sustainable transformation of the Cambodian GFT sector**. Beyond dialogue, GIZ-FABRIC is committed to inspiring, coordinating, and monitoring multi-stakeholder action on the industry's most pressing sustainability issues.

**This series of SRPs will directly support** the implementation of the Cambodian Government's GFT Sector Development Strategy 2022-2027. All relevant stakeholders are invited to participate in the dialogue and join forces for a sustainable GFT industry in Cambodia.

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