

# UN Women Gender Equity Seal Certification System and Implementation Strategy

Prepared By  
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April 2012



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and the Empowerment of Women

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# Welcome

This publication defines the standard requirements for the Gender Equity Seal and suggests an action plan for the Gender Equity Seal Certification System. The goal of the Gender Equity Seal Certification System is to spur companies to promote, improve on and monitor the position of women in their workforce.

The proposed Gender Equity Seal (GES) Certification System includes a set of five steps that a company can progress through within specified time periods and which results in the award of the Gender Equity Seal after a successful audit.

This GES Standard and Certification System project emerged from a Results Based Initiative (RBI) conducted by UN Women and partners with 10 companies in the Cairo area of Egypt. The RBI sought to raise awareness internally on women's employment and career opportunities, document inequalities and undertake strategic measures to correct gender bias.

Based on the learnings from the RBI work, UN Women worked with Social Accountability International (SAI) to develop an auditable gender equity standard and a related certification system. SAI developed the GES Standard and Certification System as a progressive certification system that integrates capacity building. The goal is to enable organizations to:

- Develop, maintain and implement policies and procedures in order to manage gender equity issues to meet a rigorous standard.
- Credibly demonstrate to stakeholders that practices at the organization meet the requirements of the Standard.

This document includes the GES Standard that resulted from an extensive stakeholder consultation process. It also provides clear guidance on the five steps in the progressive Certification System, as well as guidance on GES auditor training, how to promote GES to buyers and suggested reporting processes.

The advantage of the GES Certification System is that it can assist a range of organizations - from those looking to build gender equity policies and procedures into their existing management systems, to helping those build such systems "from scratch". Training and building capacity at the organization level will be critical to the effective implementation of the GES Standard and this is anticipated and outlined in this document. The GES Certification System plans to use auditors that already possess experience in conducting a management system-based labor audit. This reduces the amount of additional training required for a GES auditor and allows the same team that performs a labor audit, to perform the GES audit at the same time.

We hope that this document provides a tool - the GES - that can assist organizations in discerning the needs of women workers. Up to 90% of workers in a supply chain providing goods destined for export, are women. By enhancing their livelihood, the conditions of the whole workforce and local communities will also be improved.

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## ■ Introduction

*“The power of GES comes from a widespread application...”*

*“A mechanism to ensure mandatory compliance with such standards on gender equity needs to be developed....”*

*“This is an important and much awaited initiative. High time that companies inculcate gender equity principles across their supply chain”.*

These are a few of the hundreds of comments received following the launch of the public survey to elicit people’s views on the value of the Gender Equity Seal Certification System.

Women now form the majority of workers in many industries and represent 40% of the global labour force. The policies and practices of business, both as a direct employer and as an influencer of employment conditions in other parts of the supply chain, have a huge impact on the lives and status of working women globally. Yet, while non-discrimination is enshrined in local and international employment laws, gender-based job discrimination can be found in most sectors and all countries.

In a world of open trade, gender inequality has become more costly because it diminishes a country’s ability to compete internationally – particularly if the country specializes in exporting goods and services that men and women workers are equally well suited to produce. In a globalized world therefore, countries that reduce gender-based inequalities in economic participation, will have a clear advantage over those that delay action.

## ■ Background

The Gender Equity Seal (GES) project emerged from a series of Results Based Initiatives (RBIs) conducted jointly by the World Bank, UN Women and the International Centre for Research on Women (ICRW) as part of the World Bank Group's Gender Action Plan (GAP) launched in 2006. The overall goal of GAP was to “enhance women's economic empowerment and reduce constraints that directly affect their productivity”. These RBIs were conducted in Liberia, Kenya, Egypt, Mekong and Peru.

The RBI in Egypt sought to promote women's employment, training and career advancement in private firms through the use of the Gender Equity Model (GEM) – a framework for assessing, through interviews, and improving and facilitating, through training, women's access to jobs, professional development and participation in decision making processes. The project worked with companies to document inequalities between men and women, undertake strategic measures to correct gender bias and promote a better work environment resulting in more motivated staff. GEM targeted medium and large-sized companies in the greater Cairo area and, with the assistance of Egypt's governmental counterpart, the General Authority for Investment and Free Zones (GAFI), offered public recognition of gender equity efforts taken by participating firms.

The keen uptake of GEM in Egypt led the UN Women team to consider creating a formal gender equity certification system and approached Social Accountability International (SAI) with a view to developing such an initiative.

The ambition now is for GES to become a global certification system that can be used by an organization to measure and monitor the status of women in its workplace and create gender equity policies that integrate, as seamlessly as possible, into existing management systems.

The two major stages of this GES project were:

- the development of the GES Standard
- the development and implementation of the GES Certification System

## ■ Stage 1: Development of GES Standard

The development of the GES Standard consisted of three main phases:

1. Drafting of GES Standard
2. Public Survey and Multi-stakeholder Review of GES Standard
3. Final Version of GES Standard

### ■ Phase 1 - Drafting of GES Standard

SAI conducted research on existing human rights instruments, labour standards, gender legislation and management systems approaches for labour compliance. In addition, SAI evaluated existing gender initiatives, particularly those projects in which UN Women had been a partner, such as the Calvert Women Principles, the San Francisco Gender Equality Principles and the UN Global Compact's Women Empowerment Principles. After extensive review, SAI drafted a Gender Equity Seal (GES) Standard that incorporated existing elements, addressed gaps in existing standards and added a management systems requirement.

### ■ Phase 2 - Public Survey and Multi-stakeholder Review of GES Standard

SAI opened a period of public consultation on the draft GES Standard through two mechanisms:

1. Multi-stakeholder survey
  2. Multi-stakeholder interviews
1. The GES Standard was posted online with an accompanying survey written by SAI. SAI widely promoted the survey to encourage people to complete it and add specific comments on the draft GES Standard. Over one hundred people completed the survey. SAI analyzed the comments and amended the draft GES Standard. SAI also used the information to shape the Certification System and the Implementation Strategy. The survey and detailed analysis can be found in Annex 1. Individual survey responses are available upon request.
  2. SAI conducted over twenty five in-depth phone interviews with a range of stakeholders (brands, retailers, suppliers, trade union representatives, NGOs, intergovernmental organizations and certification bodies) to gain their expertise and comments on the GES Standard and its implementation. The interviews also helped to identify possible candidates for future GES pilot studies. The list of interviewees can be found in Annex 2. Individual interviewee notes are available upon request.

In both the survey responses and interviews, comments emphasized the following points:

- There is a clear need for a gender-focused standard.
- There is potential for broad application of GES, with particular need for use in the supply chain.
- GES needs to add value to existing labour standards.
- A tiered or progressive approach will improve uptake of GES.
- Collaboration between GES and other existing gender initiatives (regional, municipal and corporate) would be desirable.
- GES system should be flexible enough to be applied cross-sectorally.

## ■ Phase 3 - Final Version of GES Standard

This is the full text of the GES Standard:

### **PURPOSE AND SCOPE**

The intent of the Gender Equity Seal (GES) is to provide a standard, based on international human rights norms and national labour laws, that will protect and empower all women and men within an organization’s scope of control and influence, who produce products or provide services for that organization, including personnel employed by the organization itself, as well as by its suppliers, contractors, sub-suppliers, contracted workers, homeworkers and temporary workers.

Gender equity means that women and men are treated fairly according to their respective needs. This may include equal treatment or treatment that is different but considered equivalent in terms of rights, benefits, obligations and opportunities.

GES is offered in the hope that using such a targeted “gender lens” will inspire and intensify efforts to empower women to participate fully in economic life across all sectors and throughout all levels of economic activity. It provides a way for an organization to communicate these values to all stakeholders.

GES has been designed to be integrated into an organization’s existing labour monitoring and management systems. GES provides added value through the inclusion of capacity-building processes in the Standard itself. The goal is to enable an organization to benefit from the talents and skills of a fully participatory workforce.

GES is verifiable through an evidence-based process. Its requirements apply universally, regardless of an organization’s size, geographic location or industry sector. By complying with these requirements, the GES will enable an organization to:



- a) Develop, maintain and implement policies and procedures in order to manage those issues which it can control or influence;
- b) Credibly demonstrate to stakeholders that existing organization policies, procedures and practices satisfy the requirements of this Standard.

Concerning gender issues, the organization shall comply with national and all other applicable laws, including applicable international labour standards, prevailing industry standards, other requirements to which the organization subscribes and this Standard. When the same issue is addressed by national and other applicable laws, including applicable international labour standards, prevailing industry standards, other requirements to which the organization subscribes and this Standard, the provision most favourable to personnel shall apply. The organization shall also respect the gender principles of the international instruments listed in Annex 3.

## **DEFINITIONS**

1. Definition of organization: An entity or group of people and facilities with an arrangement of responsibilities, authorities and relationships.
2. Definition of personnel: All individual men and women directly employed, contracted or sub-contracted by an organization, including directors, executives, managers, supervisors and workers, including casual and temporary workers.
3. Definition of worker: All non-management personnel.
4. Definition of supply chain: Sequence of activities or parties that provides products or services to the organization.
5. Definition of supplier or contractor: An organization which provides another organization with goods and/or services utilized in the production of its goods and/or services.
6. Definition of sub-supplier or sub-contractor: An organization in the supply chain which, directly or indirectly provides the supplier or contractor with goods and/or services utilized in the production of its goods and/or services.
7. Definition of corrective action: Steps taken to remove the causes of an existing non-conformity or undesirable situation.
8. Definition of preventive action: Steps taken to remove the causes of a potential non-conformity or undesirable situation.
9. Definition of stakeholder: An individual or group concerned with or affected by the performance of the organization.
10. Definition of forced and compulsory labour: All work or service that is exacted from any person under the menace of any penalty, threat of punishment or retaliation, demanded as a means of repayment of debt and which the person has not offered to do voluntarily.

11. Definition of human trafficking: The recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud or deception for the purpose of exploitation.
12. Definition of home worker: A person who is contracted by the organization or by a supplier, sub-supplier or subcontractor but does not work on their premises.

## **CRITERIA**

### **1. RECRUITING, EMPLOYMENT AND TERMINATION**

The organization shall promote gender equity and non-discrimination in employment areas such as hiring, remuneration, access to training, promotion, termination and retirement. The organization shall take concrete steps to attain gender equity by adopting and implementing employment policies, procedures and practices that eliminate gender discrimination in these areas. The organization shall comply with national and all other applicable laws, including applicable international labour standards, prevailing industry standards, other requirements to which the organization subscribes and this Standard and extend this equally to all personnel.

In particular the organization shall:

- a) Ensure the existence of policies on gender equity and policies on anti-discrimination and a commitment to equal opportunity. These policies shall encompass amongst other criteria in relation to employment: recruitment and selection processes, interviews, contract agreements, salary and pension schemes and any other benefits, retention, skill development and training programmes, retirement programmes and termination of labour contracts.
- b) Promote the employment of women and men in non-traditional occupations for their gender by undertaking concrete, verifiable actions to recruit and retain candidates from traditionally underrepresented groups.
- c) Proactively promote the participation by women in decision-making and governance at all levels in the organization and the recruitment and appointment of women to managerial and executive positions including to the corporate board of directors.
- d) Provide equal opportunities for all aspects of training and personal and professional development, including job-related skills, literacy training, education and certified vocational and information technology training.
- e) Not subject personnel to pregnancy or virginity tests under any circumstance related to their employment.
- f) Provide opportunities for formal and informal networking, events and mentoring which allow for equal access by all personnel.
- g) Implement equitable policies for non-salaried personnel regarding contract work, temporary work and layoffs that do not disproportionately affect women or men.

- h) Ensure that men and women personnel receive equal pay for work of equal value, taking into account skill levels and length of service. Ensure fair and comparable wages, hours and benefits, including retirement benefits, for all personnel for comparable work.
- i) Have in place well defined policies for the calculation of basic wages, overtime, bonuses and payroll deductions that are free of gender discrimination bias and ensure that all personnel understand these policies.
- j) Establish action and policies within the organization to ensure that personnel who take maternity or paternity leave are not impacted negatively on their return and support their return to positions without loss of seniority or reduction in pay scale or benefits.
- k) Base individual dismissals on the principle of non-discrimination and do not take gender into account. In collective dismissals, the organization shall demonstrate that dismissals were not based on gender.

## 2. WORKING ENVIRONMENT

Companies will take concrete steps to attain gender equity by adopting and implementing policies to secure the health, safety and well-being of all personnel.

Companies will, wherever possible, take concrete steps to attain gender equity by adopting, implementing and promoting policies and practices that support educational, career and vocational development.

In particular the organization shall:

- a) Prohibit, prevent and remedy all forms of violence and harassment in the workplace, including verbal, physical, sexual or psychological abuse.
- b) Clearly state that sexual harassment in any form is not acceptable in the workplace or in any facilities related to the workplace including transportation and dormitories.
- c) Prohibit sexual harassment, including unwelcome sexual advances, unwanted hugs and touches, suggestive or lewd remarks, requests for sexual favours and the display of indecent, derogatory or pornographic pictures, posters, drawings or videos.
- d) Protect all personnel from retaliation for complaining about harassment.
- e) Take effective steps to protect the safety of all personnel in the workplace, in travel to and from the workplace, in organization-provided housing and on organization-related business.
- f) Train (where relevant) security staff, doctors, nurses, managers and other key personnel to recognize signs of gender-based violence and understand laws and the organization's policies on human trafficking and sexual exploitation.

- g) Undertake to assess all the risks to new and expectant mothers arising out of their work activity and to ensure that all reasonable steps are taken to remove or reduce any risks to their health and safety. If the organization provides the expectant mother with a different job during the pregnancy, this must be at equal pay to her previous job.
- h) Eliminate and disclose unsafe working conditions and provide protection from exposure to hazardous or toxic chemicals in the workplace, particularly when those substances have known or suspected adverse effects on the health of women and men specific to reproductive health.
- i) Take reasonable actions to ensure that personnel have access to health services and insurance which serve the distinctive concerns and needs of women and men.
- j) Ensure that representatives of workers and any personnel engaged in organizing workers are not subjected to discrimination, harassment, intimidation or retaliation for reason of their being members of a union or participating in trade union activities and that such representatives have access to their members in the workplace.
- k) Undertake concrete, verifiable actions to promote, offer and implement flexible work options; time off for family, parental or dependent care; and related workforce reentry opportunities.
- l) Offer flexible working arrangements and on-site facilities to women who are pregnant or nursing.
- m) Allow time off for personnel seeking medical care, treatment or counseling, for themselves or their dependents.
- n) Take reasonable actions to ensure that personnel have access to childcare services. o) Ensure that the organization's dress code is gender neutral and respects and makes reasonable accommodation for personnel's religious practices and beliefs, taking into account occupational health and safety.
- p) Maintain ethical marketing standards by respecting the dignity of women in all sales, promotional and advertising materials and excluding any form of gender or sexual exploitation in marketing and advertising campaigns. The organization shall forbid business-related activities that condone, support or otherwise participate in trafficking, including labour or sexual exploitation.

### 3. MANAGEMENT SYSTEMS

As a requirement of meeting the GES, the organization shall develop and implement a management system to ensure that all personnel follow the gender equity policies stated above. The management system shall consist of policies, procedures and record-keeping that can be reviewed to verify its existence. The organization shall demonstrate that all personnel are trained and aware of the gender equity policies and procedures. The organization shall actively promote the implementation of the management system to operationalize the GES in its daily activities.

The organization's management system shall include the following:

- a) A statement from senior management that affirms support for the adoption of the GES.
- b) The organization shall establish and display the GES and policy in appropriate form and in a prominent, easily viewable place on the organization's premises.
- c) The organization shall ensure that the policy and procedures are effectively communicated to all personnel in all native languages whether the personnel are directly employed by the organization, contracted through a third party or working on its premises for a customer, supplier or sub-contractor.
- d) The organization shall maintain records related to the implementation of the GES and other aspects of the management system requirement contained in this section.
- e) Senior management shall facilitate the formation of a Gender Equity Committee (GEC) with the task of developing and implementing the requirements of the GES. The GEC shall include male and female representatives from management and workers, selected by their peers.

In unionized facilities, worker representation in the GEC shall be undertaken by recognized trade union(s). Elsewhere, workers may elect representatives from among themselves for this purpose. In no circumstances, shall GEC be seen as a substitute for trade union representation. Once selected, the team members shall select a Gender Equity Coordinator, who, irrespective of other responsibilities, shall ensure that the requirements of this Standard are met.

- f) The GEC and Gender Equity Coordinator shall conduct routine internal audits and produce reports for senior management on the performance and benefits of actions taken to fulfill the gender equity policies. The GEC shall have the authority to coordinate with other departments to study, analyze, define and/or address any cases related to any violations of the gender equity policies.
- g) The organization shall establish quantitative and qualitative indicators and targets under its gender equity policies and establish methods to collect statistical data. The organization shall document all areas for improvement uncovered by its monitoring and evaluation processes and strengthen its gender equity policies accordingly. The organization shall report regularly by department on its gender equity policies, using benchmarks and key performance indicators and this shall be included in the performance reviews of the managers responsible. Summary reports shall be made available to workers.
- h) The GEC shall conduct periodic meetings to review progress towards promoting gender equity in the organization including monitoring progress on the gender equity indicators and identifying potential changes to strengthen the gender equity policies.
- i) The organization shall ensure that the requirements of this Standard are understood by and implemented at all levels of the organization including for full time, temporary and contracted personnel.

- j) The organization shall demonstrate that there are routine communications with all personnel concerning gender equity and that all personnel have channels for communicating to management.
- k) The organization shall establish a confidential, unbiased, non-retaliatory grievance procedure allowing personnel to make comments, recommendations, reports or complaints concerning their treatment in the workplace regarding gender equity. The organization shall have in place procedures for investigating, following up on and communicating the outcome to all personnel of any complaints in respect to the gender equity policies. The organization shall provide a confidential means for all personnel to report on non-conformances with this Standard to the GEC and the Gender Equity Coordinator. The GEC shall investigate, address and respond to the concerns of personnel and other stakeholders about conformance/non-conformance with the organization's gender equity policies. The organization shall refrain from disciplining, dismissing or otherwise discriminating against any personnel for providing information in relation to this Standard.
- l) The organization shall cooperate with external auditors to determine the severity and frequency of any problems that arise in meeting the GES and shall conduct analysis to determine if the problems are systemic or isolated.
- m) The organization shall promptly implement corrective and preventive actions and allocate resources appropriate to the nature and severity of any identified nonconformance with the organization's gender equity policies and this Standard. The organization shall maintain central records that identify any non-conformances related to gender equity, the root cause analysis, the corrective action taken, the responsible personnel and the timeline for implementation.
- n) The organization shall demonstrate its willingness to attain sustainable compliance by participating in dialogue with stakeholders, including, but not limited to -- workers, trade unions, suppliers, contractors, buyers, consumers, NGOs, investors, media and local and national government officials.
- o) The organization shall conduct routine training for all new and existing personnel on its gender equity policies. The organization shall document and record the nature and frequency of the training for all personnel. The organization shall establish methods to determine the effectiveness of the training.
- p) The organization shall demonstrate that it has taken steps to promote the gender equity policies of GES in its supply chain. The organization shall communicate the policies to suppliers and contractors and receive written confirmation of their receipt. To the extent possible, the policies shall be included in contractual and other agreements. The organization will train its internal staff, including those responsible for procurement, to evaluate the suppliers' level of implementation of GES. This provision shall be extended to suppliers and contractors that utilize home workers.

## ■ Stage 2: Development & Implementation of GES Certification System

Once the GES Standard had been amended to reflect the consultation process, SAI formulated an Implementation Strategy for the GES Certification System.

### ■ Overall Structure and Process of GES Certification

GES will be a Certification Process that includes formal recognition of the following steps within specified time periods:

#### **Pre-audit**

**Step 1:** Organizational Public Commitment (signing) to GES principles

**Step 2:** GES Management Systems Self-Assessment (self-reporting) within six months of signing in Step 1

**Step 3:** GES Management Systems Independent Evaluation of Self-Assessment (remote or on site) within three months of completing Self-Assessment (Step 2)

*(Training and capacity building possible throughout these stages as and when identified and required)*

**Step 4:** Organizational Commitment to seek GES Certification (within three months of Independent Evaluation in Step 3)

*(Training and capacity building possible throughout these stages as and when identified and required)*

#### **Performance audit**

**Step 5:** On-site Independent Verification integrated into general social/labour audit within one year of Commitment to seek GES Certification (Step 4)

### ■ Formal Recognition and Reporting

UN Women or designated agency will report publicly on each organization's progression through the steps. The intent is to encourage the organizations to build capacity and progress through the steps in a timely fashion towards the ultimate goal of GES certification. This time frame helps organizations to start the process and continue, recognizing that they will have different starting points and different challenges in their progression towards certification. Recognizing each step in the process will encourage

more organizations to sign up to GES and contribute to building awareness around the GES principles. The Self-Assessment and Independent Evaluation scores are intended only for internal use to identify areas for improvement and are not intended to be made public by the organization as an indicator of their performance.

Specifically reporting will consist of:

- UN Women or designated agency publicly listing the step that each organization is at but will not report on performance
- UN Women or designated agency removing the names of those organizations from the public list that do not reach the steps within the time guidelines
- UN Women or designated agency publicly listing all organizations that are certified to GES
- Certified organizations being able to publicize their compliance to GES

## ■ Steps in Certification Process

### ■ *Step 1 - Organizational Public Commitment to GES Principles*

The organization signs the GES Statement of Commitment which is a public declaration of agreement with the principles espoused by the GES Standard. By signing the Commitment, the organization agrees to promote the principles of gender equity throughout its organization's structure and culture.

### ■ *Step 2 - Management Systems Self-Assessment*

The organization completes a Self-Assessment that is focused on the management systems requirement of GES and evaluates the existing level of systems development and implementation. The Self-Assessment will be easily accessible, inexpensive and not time-intensive. It must be completed within six months of Step 1 in order to maintain the public listing of the organization. The Self-Assessment provides the organization with a numerical rating (for internal communication) in each of the following categories which are based on the management systems requirements of the GES Standard:

1. Management systems: The organization has developed and implemented a management system to ensure the existence of procedures for all personnel to follow the GES. The management system should consist of policies, procedures and record-keeping that can be reviewed to verify its existence. The organization should actively promote the implementation of the management system so there is awareness and it is operationalized in its daily activities.
2. Internal Social Compliance Team: The organization has formed a Gender Equity Committee (GEC). This internal multi-department social compliance



team that includes worker representation is key to driving improvement and creating positive change under GES. Without the GEC, it is unlikely that there will be any sustainable change. The GEC team also helps to build internal cohesion between the departments and management and workers.

3. **Worker involvement and communications:** The organization has ensured that the requirements of GES are understood and implemented at all levels including for full time, temporary and contracted personnel. The organization should demonstrate that there are routine communications with all personnel concerning the GES elements and that all personnel have channels for communicating to management. The organization should also undertake continuous monitoring of activities and results to demonstrate the awareness and effective implementation of the gender equity policies.
4. **Complaint management and resolution:** The organization should have established a confidential, unbiased, non-retaliatory grievance procedure allowing personnel to make comments, recommendations, reports or complaints concerning their treatment in the workplace regarding gender equity. The organization should have in place, procedures for investigating and following up on any complaints and communicating the outcome to all personnel. The organization should provide a confidential means for all personnel to report on non-conformances with the GES to the GEC. The GEC should investigate, address and respond to the concerns of personnel and other interested parties with regard to conformance/non-conformance with the organization's gender equity policies. The organization should refrain from disciplining, dismissing or otherwise discriminating against any personnel for providing information in relation to the GES.
5. **Level and type of non-conformances:** The organization should have conducted internal audits and cooperate with external auditors, to determine the severity and frequency of problems in meeting the GES and conduct an analysis to determine if the problems are systemic or isolated.
6. **Progress on corrective actions:** The organization should be maintaining central records that identify the non-conformances in relation to GES, the corrective action taken, the responsible personnel and the timeline for implementation. The organization should promptly implement corrective and preventive actions and allocate resources appropriate to the nature and severity of any identified nonconformance with the organization's gender equity policies and the GES.
7. **External verification and stakeholder engagement:** The organization should have established and maintained procedures to communicate regularly to all interested parties, data and other information, regarding compliance with the requirements of GES. The organization should demonstrate its willingness to participate in dialogues with interested stakeholders, including, but not limited to: workers, trade unions, suppliers, subcontractors, sub-suppliers, buyers,

- consumers, NGOs, investors, media and local and national government officials, aimed at attaining sustainable compliance with GES.
8. Training and capacity building: The organization should be conducting routine training for all new and existing personnel on the gender equity policies and procedures. The organization should document and record the nature and frequency of the training for all personnel and establish methods to determine the effectiveness of the training.
  9. Management of suppliers and contractors: The organization, if a company, should have demonstrated that it has taken steps to attain compliance with GES in its supply chain. The company should maintain appropriate records of suppliers' and contractors' commitment to GES, including but not limited to, contractual agreements and/or written commitment of those organizations, that they are aware of the requirement.

### ■ *Step 3 - Management Systems Independent Evaluation*

The organization undergoes the Management Systems Independent Evaluation which entails an analysis of the Self-Assessment, conducted through interview and document review. These Independent Evaluations will be conducted by individuals and organizations approved by UN Women or a designated agency. It must be completed within three months of Step 2 in order to maintain the public listing of the organization. The Independent Evaluation provides the organization with a numerical rating (for internal communication) in each of the same categories reviewed in the Self-Assessment. The combination of the Self-Assessment and Independent Evaluation provide the organization with a tailored plan to improve toward GES Standard compliance.

### ■ *Step 4 - Organizational Commitment to seek GES Certification*

Senior management commits the organization to implement the GES Standard throughout its systems and culture and to seek GES certification, through the process described in Step 5. This Organizational Commitment must be completed within three months of Step 3 in order to maintain the public listing of the organization.

### ■ *Step 5 - Performance Audit (Independent Verification)*

On-site Independent Verification (integrated into general social / labour audit) within one year of Step 4 in order to determine certification to GES.

## ■ **Certification System Overview**

To start the GES Certification System, an organization contacts an accredited auditing firm or Certification Body (CB) and should contact several firms in order to compare rates.

Auditors from these CBs visit facilities and assess organizational practice on a wide range of issues, evaluating the state of an organization's management systems and performance. The audit report is provided to the organization and to the CB. The CB then conducts a review of the report and makes a decision on whether to grant the certificate.

The certificate represents a significant milestone and certified facilities can make public their certification. Once certified, the GES certification period is three years, with a series of required surveillance audits throughout this three year period. The accreditation agency also publishes this information on its website.

If GES is developed as a business to business certification system, facilities can display the certificate they receive from the CB. If GES is developed as a business to consumer certification system, UN Women, as standard owner of GES, or its designated affiliate, will issue the label and individual products will be labeled accordingly. UN Women or its designated agents will maintain a public list of all currently and previously certified facilities. The GES system does not set a specific amount for the cost of the Certification Process as the size, scope and location of the facility will determine the cost. The cost varies depending on the number of days and auditors needed to conduct the audit at the facility. There are four basic types of out-of-pocket costs associated with GES certification:

1. The cost associated with taking corrective and preventive action in order to qualify for compliance with GES. After this, an organization would seek verification of its compliance.
2. The cost of preparing for the audit which in this case is the pre-audit stage of Self- Assessment and Independent Evaluation.
3. The cost of an independent onsite audit by an accredited CB. It is anticipated that the cost of a GES audit may be reduced by conducting it at the same time as an organization's general social or labour audit.
4. The cost associated with taking corrective actions to resolve problems (if non-conformances have been identified).

A separate accreditation agency accredits CBs, which are then qualified to certify workplace compliance to GES. Accreditation is an oversight process for ensuring the professional objectivity of audits and consistency in practice over time and between locations.

## ■ Roles and Requirements in the Certification System

In order to manage the Certification System, UN Women or the designated agency will need to have the following components in place. Full details of one option for the Certification System, including roles and requirements, are provided in

Annex 4. This suggested system may be modified depending on the strategy that UN Women chooses to adopt for GES:

### ■ *Role of the GES Standard Owner*

As standard owner, UN Women, with the support of SAI, will provide guidance, interpretation and examples of application of GES' requirements, for auditors and other users of the GES. Guidance is updated along with revised versions of GES and is developed for location, sector and issue-specific questions when the need is communicated to UN Women.

### ■ *Role of Accreditation Agencies*

Accreditation is the process by which formal recognition of competence is given to qualified organizations, known as CBs, who are then granted the ability to perform certifications. Certification of compliance to GES and other verification codes is available only through qualified CBs granted accreditation.

Accredited certification provides assurance to stakeholders that CBs consistently, reliably and effectively certify organizations to social standards such as GES. Accreditation bodies or agencies set strict policies and oversight procedures for the accreditation of qualified organizations to issue and monitor certification clients. These activities include document reviews, office audits (managing offices and field audits through sampling methodology), observations of auditors on site to verify their work is consistent and meets set out requirements of the system and surveillance monitoring for continuous compliance to GES requirements. Accreditation provides transparency, credibility and a framework for a quality management system for the CB and its clients. Additionally, accreditation allows the system owner the opportunity to continually improve the quality and effectiveness of the system as a whole, as accreditation allows for the regular measuring and oversight of system functionality, metrics which are in turn used to improve the system's general operation.

CBs need to be accredited to assure stakeholders that the auditing companies are able to consistently and reliably perform a GES certification audit and that these audits are carried out in an effective and consistent manner. The purpose of accreditation is to ensure that auditing bodies are competent to do the work they undertake and that their audit practices are undertaken impartially, competently and effectively, providing quality assurance to stakeholders and reducing risk to the system. Owners of social and environmental audit systems need to ensure that the audit system meets its intended purpose and that third party validation is performed by audit companies qualified to do so. Accreditation provides validation and a high degree of assurance that the system fulfills its intended requirements.

## ■ *Role of Certification Bodies*

The CB shall retain authority and shall be responsible for its decisions relating to certification, including the granting, renewing, suspending and withdrawing of certification. The CB shall include in its operating procedures a description of the specific gender equity certification processes for which it is accredited and the sequence in which they occur.

## ■ *Auditor Competency Requirements*

GES audits will be conducted by auditors with qualifications at two levels: as a lead auditor or as a team member. These auditors will already be qualified in conducting management

systems based social audits and they will receive specialized development training on the GES Standard and on conducting a gender audit. The CB shall evaluate all lead auditors and team members in the process of qualifying them to perform GES audits and regularly thereafter and shall have evidence available to demonstrate the competence of each one.

## ■ *Audit Protocol and Guidance*

The GES Certification Process consists of the five steps outlined above. It is envisioned that UN Women or its designated agency will conduct the pre-audit steps 1-4 while the onsite certification audit will be conducted by a CB. This audit will involve an assessment of the organization's GES management systems and their performance in meeting the specific requirements of the GES Standard. Audits will follow a prescribed protocol and are designed to be conducted as a supplement to an organization's complete social compliance audit. The GES audit will provide a more in depth look at gender issues while keeping the supplemental audit costs as low as possible.

## ■ *Complaint Management and Resolution System*

To ensure an open system and the ability of UN Women to learn about any weaknesses in the system, all certified facilities must have an open complaints and appeals process, through which workers or their advocates can raise concerns about compliance. This requirement is included and detailed in the GES Standard. The ability to receive and respond to complaints is a critical aspect of ensuring the integrity of the system and continuously improving compliance – both within a given facility and throughout the GES oversight system. There are two kinds of complaints: a facility-level complaint (on GES compliance) would be directed to the relevant accreditation agency or CB about activities within the scope of accreditation to GES; a system-level complaint that questions the inherent nature of the GES Standard would be directed to UN Women or its designated affiliate.

## ■ *Localization of Guidance for GES Standard*

UN Women or its designated agency, with the support of local working groups, shall periodically issue guidelines for interpretation of GES criteria that take national and local law and context into account. To supplement this guidance, CBs shall have a documented and implemented process to effectively obtain, maintain and use in audit planning and audit process, information about working conditions regularly gathered from regional interested stakeholders, NGOs, trade unions and workers.

## ■ **Promoting the GES Programme to Buyers**

The goal of the GES Certification System is to ensure integration of the GES principles into an organization's existing management systems. The strength of GES will come from its wide spread acceptance and adoption by all stakeholders as a credible programme that enhances analysis and performance related to gender equity and does not duplicate existing programmes.

The GES Certification System will integrate into a brand's existing social compliance monitoring programme. The fact that it is not tied to any one specific social compliance standard means that it will have broad appeal and be useable by many organizations.

The GES audit (Step 5) will integrate into a brand's existing audit whether second (code of conduct) or third party. A qualified GES auditor will be part of this second or third party audit team and the traditional code audit will include the GES certification audit with minimal additional time.

GES will provide enhanced and value added knowledge that will assist a brand's suppliers to understand and manage the issue of gender discrimination. The management systems requirement of GES is detailed and will help suppliers to build the internal capacity to tackle other social compliance issues as well.

UN Women or its designated agency will contact existing social compliance programmes to partner in joint audits and mutual promotion. These could include Fairtrade, Rainforest Alliance, the Gender Equality Project (GEP), the Gender Equality European Standard, EICC, ICTI, SA8000 and the Responsible Jewellery Council (RJC).

UN Women or its designated agency will seek to conduct a pilot among 6-8 large corporations interested in implementing GES internally and/or in their supply chains and will seek to partner with CBs to promote GES to their clients and their clients' suppliers.

## ■ **Assisting Organizations to Build Capacity to Meet GES Requirements**

Training and building capacity amongst organizations to develop gender equity management systems at the factory level, will be critical to the effective implementation of the GES Standard.

Training and capacity building will meet quality guidelines and be carried out by organizations approved by UN Women or its designated agency. This training and capacity building element is embedded in the 5 steps of the Certification Process (see steps listed above). Methods for training will include some of the following:

- Awareness seminars
- Training workshops
- Pre-recorded online training and live webinars
- Onsite assessments and technical assistance
- Multi Stakeholder meetings and roundtables
- Lectures and presentations
- Implementation handbook and toolkits

## ■ **Building Capacity for GES Auditors**

As a pre-requisite to training, GES auditors will already possess the experience and skills to conduct an audit using a management systems auditing framework (such as ISO 9001, ISO 14001, SA8000 or equivalent as detailed in ISO 19011:2011). This will ensure that the GES auditor is already trained and experienced in understanding complex auditing processes and that these skills include the ability to plan and execute an audit plan, collect and evaluate responses to corrective action requests and understand the concepts of continuous improvement and monitoring. The prequalification requirement will also allow the same audit team tasked with conducting an organization's social or labour audit (either against an external standard or a code of conduct) to conduct the GES audit – so reducing duplication in audit time and expense.

It is anticipated that the GES qualification audit training programme will be short (2 days) consisting of a professional development curriculum: day 1 - enhancing knowledge - reviewing the GES Standard and relevant international and national gender and anti- discrimination legislation; day 2 – enhancing skills and attitudes – practicing audit techniques, role plays including a “mock” GES audit. Individuals will receive a certificate after successful completion of the 2-day course and passing the exam.

After GES qualification, an auditor may participate in GES audits. To maintain the qualification, the auditor must take a defined set of continuing professional development courses, to be determined by UN Women or its designated agency. In addition to training courses, auditors must also participate in regular calibration meetings conducted by CBs, the accreditation agency or UN Women or its designated agency.

Developing the GES auditor training will be key to successful implementation of the GES Certification System especially in the avoidance of typical weaknesses in auditor competencies such as: inconsistent results in assessing risk, delays in reporting, lack of clear evidence-gathering and lack of trust and integrity of auditors.


The following components are relevant for those organizations providing accredited training to GES auditors and will ensure that the GES audit programme is effective, robust and transparent:

- Creation of a management system to control the consistency and competency of the GES programme through defining, documenting and implementing processes to ensure that training for GES auditors is consistently controlled and competently presented, as well as capable of assessing student performance (through exams, grading, certification) and can be continuously improved & updated.
- Defining training needs through the three pronged learning objectives: knowledge, skills and attitude, while expanding from generic to GES Standard-specific objectives.
- Designing and planning training: Integrating learning objectives, styles (visual, auditory, kinesthetic) and motivations into the course design with online and classroom exercises, exams and tests, practical applications and real life and localized examples.
- Providing appropriate trainers including lead trainers, co-trainers and content experts and specifying the competency requirements for each.
- Evaluating training outcomes through student performance both externally and by self-evaluation.
- Ensuring continued learning through professional development training, auditor calibration meetings, peer discussion groups, updated guidance and observation of performance in the field.

## ■ Revenue and Budget Considerations

UN Women can pursue several revenue streams to fund the ongoing maintenance of GES. Subject to the scope and scale of certifications, this may require full-time





staff down the line, depending on how large a role UN Women hopes to play in the process. As discussed previously, UN Women may elect to maintain liaisons with applicant entities throughout the course of the Certification Process, or may elect a designated agency to review the pre audit portion of the Certification Process.

SAI has reviewed several certification and accreditation models for information on their operating and payment structures. These include:

- Marine Stewardship Council
- Forest Stewardship Council
- Rainforest Alliance
- Sustainable Agriculture Network
- Worldwide Responsible Apparel Network
- Fair Labour Association
- Fairtrade Labeling Organization
- The Orthodox Union
- Tav HaYosher
- SA8000 and Social Accountability Accreditation Services

These systems employ a variety of different processes to ensure compliance with the requirements of their standards, including: certification through third-party auditing, certification through first-party auditing, as well as more informal processes such as review of self-assessments and self-audits and sampling to ensure compliance. For added consistency and efficacy, several systems have established an accreditation programme, either in-house or with a third-party accreditation body.

Revenue streams are generated in diverse ways amongst these various systems. Revenues are generated for the standard owner through royalties for the use of the mark, application fees and training and capacity building services. In addition, in relation to GES specifically, due to wide-spread interest in gender equity, there is potential for funding from a wide variety of public and private donors.

The budget for the GES certification programme needs to take into account both internal and external costs for UN Women, as well as the costs for the organizations seeking certification. The latter costs will depend on UN Women's decision as to the scope (geographic and scale) of the implementation of GES. Once UN Women's decision is made, SAI can provide a detailed breakdown of the cost of certification. The approach will be to make each step in the Certification Process as inexpensive as possible in order to encourage widespread adoption.

Aside from the cost of certification, considerations include staff time and related

overheads for UN Women or its designated agent to do the following:

1. Implement UN Women or its designated agency's management system for GES certification programme. This includes:
  - Recruiting and training of accreditation agency
  - Procedures for CBs to apply and become accredited to certify GES
  - Procedures for qualification of GES training organizations
  - Recruiting and training of GES auditors
2. Development and distribution of GES Auditor Guidance
3. Recruitment and qualification of GES training organizations
4. Internal awareness building and coordination within UN Women
5. External marketing and outreach, including material preparation and distribution to:
  - Organizations that may become GES certified
  - Organizations that may encourage their suppliers to become certified
  - Corporations, investors and/or consumers that may accept GES
  - Industry organizations and chambers of commerce that may promote GES
  - Certification Bodies that may want to participate in GES Certification System
  - NGOs and other organizations that may partner on joint audits or mutual code recognition
  - Government and multi-lateral agencies
  - Trade unions and NGOs working on issues related to women and working conditions

## ■ Next Steps in Implementation of GES

1. UN Women evaluates recommendations for implementation of GES Certification System above.
2. UN Women consults internally to determine geographic scope of GES Certification System – regional or global.
3. UN Women consults internally to determine the structure and participation within the UN system for implementation of the GES Certification System.
4. UN Women provides SAI with decisions on the three points above.
5. If contracted by UN Women, SAI will develop a further proposal to pilot the GES Implementation Strategy. This will include a detailed workplan, budget and timeline.



## ■ Annexes

Annex 1 - Analysis of Survey Results

Annex 2 – GES Multi-stakeholder Interviewees

Annex 3 – International Legal Instruments, References and Tools

Annex 4 – Roles and Requirements in the Certification System

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# Gender Equity Seal GES





## ▶ Project Background



- UN Women partnering with SAI developing the Gender Equity Seal (GES)
- GES - a global certification system for gender equity in a company's workplace and supply chain
- Based on gender equity results based initiatives programmes led by the World Bank, UN Women and ICRW in five countries
- GES builds on Gender Equity Model (GEM) pilot project in Egypt



GES - for the entire workforce

GES applies to the whole workforce – equity for all



GES – Better and safer working conditions

Application of GES: cohesive retained and safer workforce, better for all

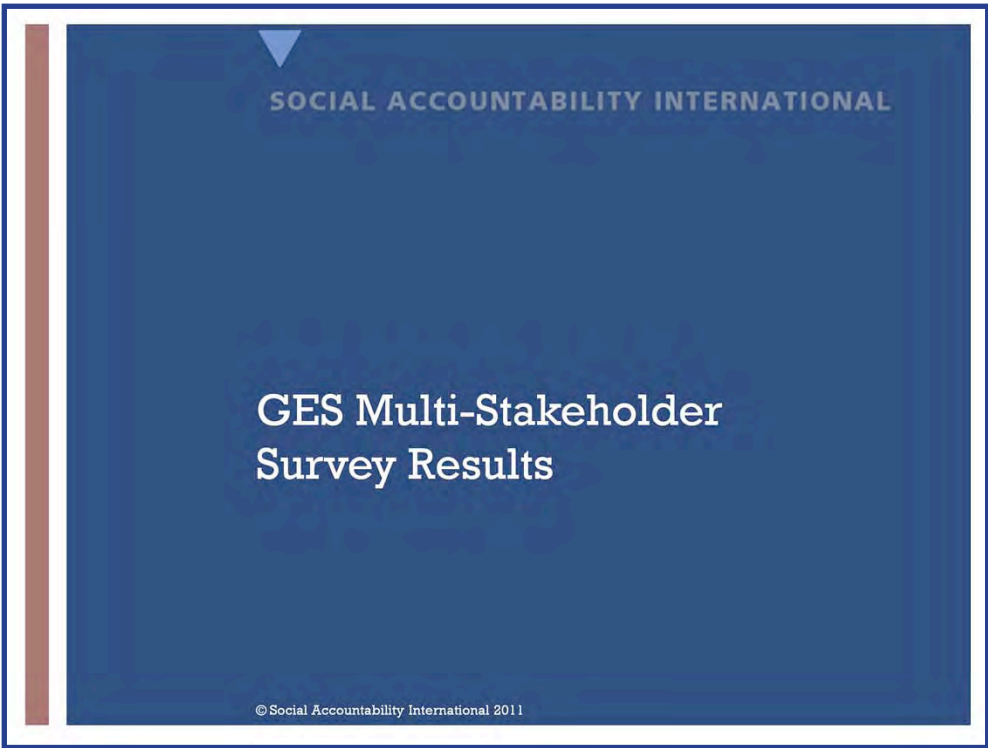




## ▶ GES Project Steps

- SAI prepared draft GES standard and certification system
- UN Women reviewed these drafts
- SAI conducted public consultation which included:
  - Multi-stakeholder survey
  - Multi-stakeholder interviews
- Based on this public consultation, SAI revised the draft GES standard
- SAI is currently developing recommendations for program strategy and implementation of GES





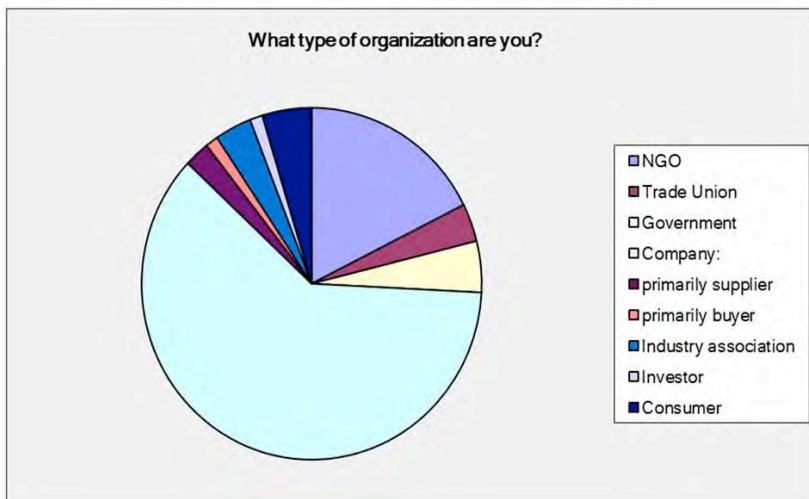
## ▶ Gender Equity Seal Survey

(select quotes from over 100 respondents)

- "This is an important and much awaited initiative. High time that companies inculcate gender equity principles across their supply chain"
- "GES will be especially needed in developing countries"
- "The power of GES comes from a widespread application..."
- "Initially it is required to convince big brands to implement GES to their supply chain"
- "A mechanism to ensure mandatory compliance with such standards on gender equity needs to be developed"
- "GES can only be implemented if there are strong rules and regulations from the governmental side"
- "It should be cheap as it can be in the first year"

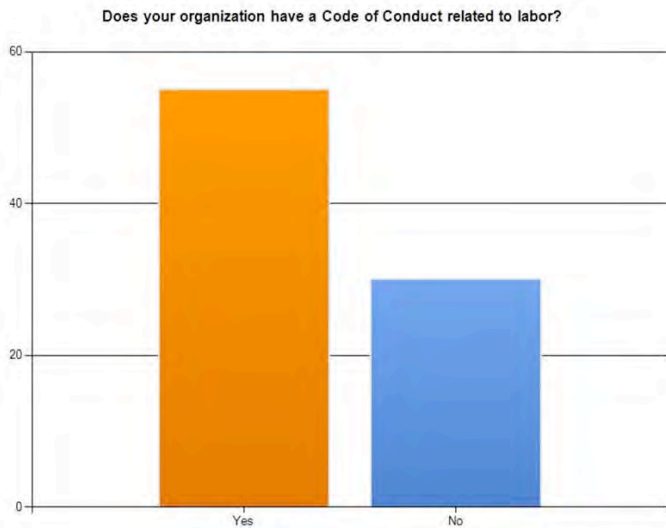
This survey launched in mid December 2011, running to end of January 2012, elicited over 100 respondents

## ▶ Responding Organizations



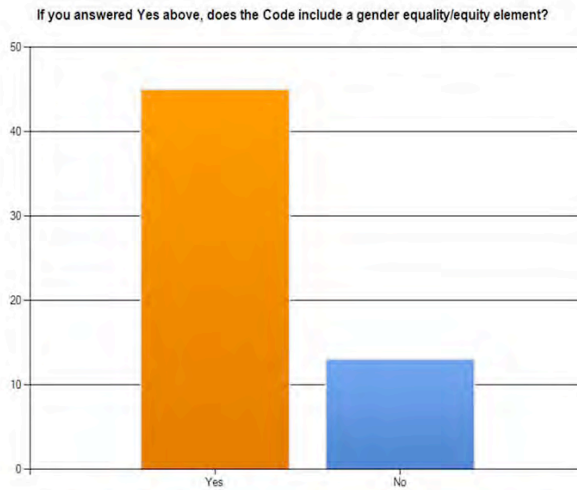
There was a high response rate from companies, which is encouraging for the project and useful for our analysis.

## ► Code of Conduct?



We envision that GES will need to be integrated into existing codes of conduct. Therefore, we wanted to find out the ratio between those organizations that have and do not have a code of conduct.

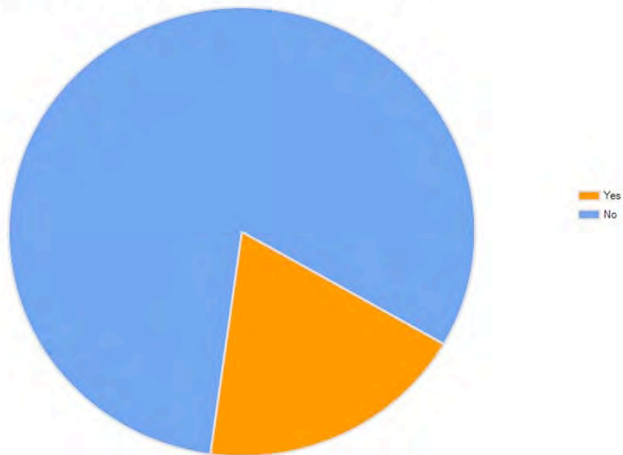
## ► Gender equity?



Of those organizations that have a code of conduct, this shows the ration between those that specifically address gender vs. those that do not address gender.

## ► Awareness of Standards?

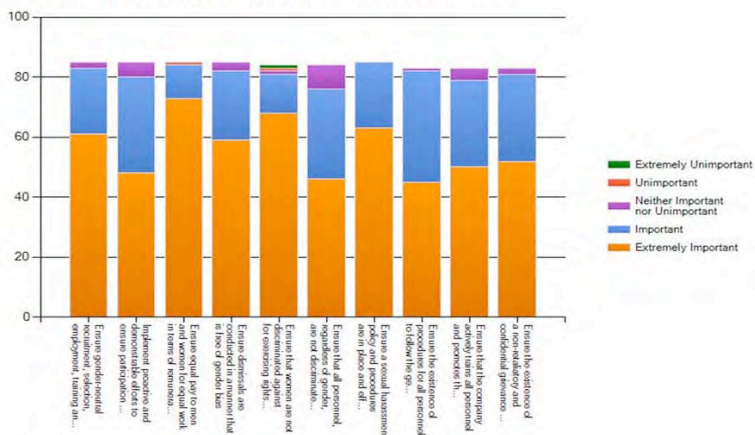
This Survey is inviting comments on the Gender Equity Seal (GES). Are you aware of any other similar stand-alone gender equity standards?



This shows that there is a lack of awareness of gender equity standards and therefore indicates that there may be a need for GES in the market.

## ▶ Ranking of GES criteria

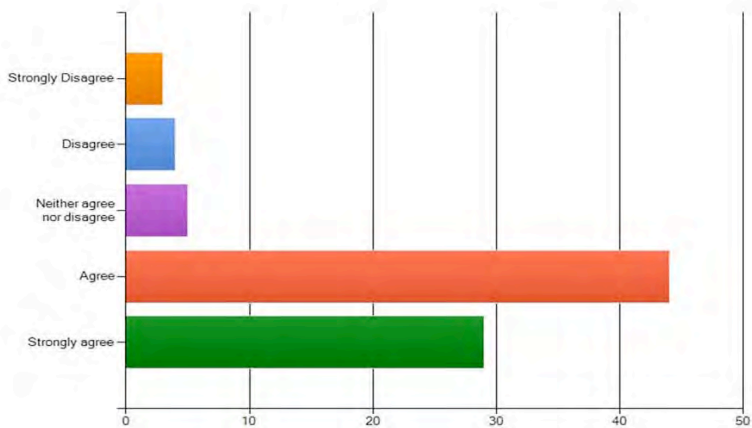
Please rate the criteria that you believe are most/least important to include in a gender equity standard for the workplace, such as GES:



This shows that all criteria selected by SAI for the draft standard are considered “important” or “extremely important”. Thus, we can be confident that the draft standard is comprehensive with regard to the key issues.

## ▶ Added value?

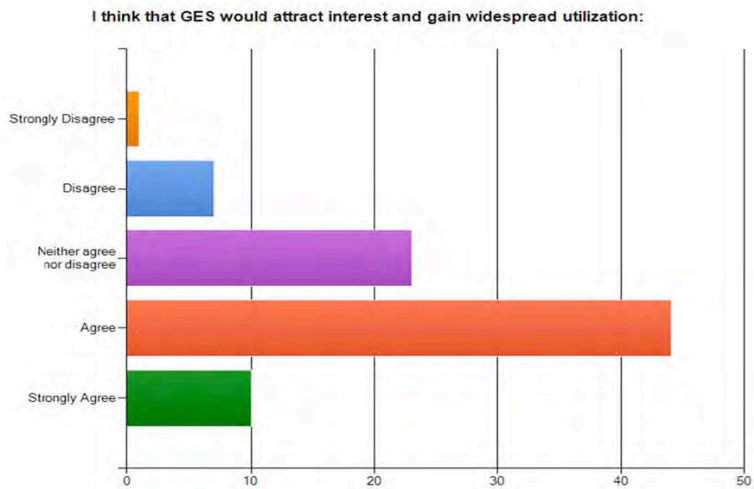
I think that GES would be a useful addition to the existing field of labor standards and/or codes:



This shows the ratio of people who think that GES would be a useful addition to the labor standards field. Most “Agree” and “Strongly Agree”.



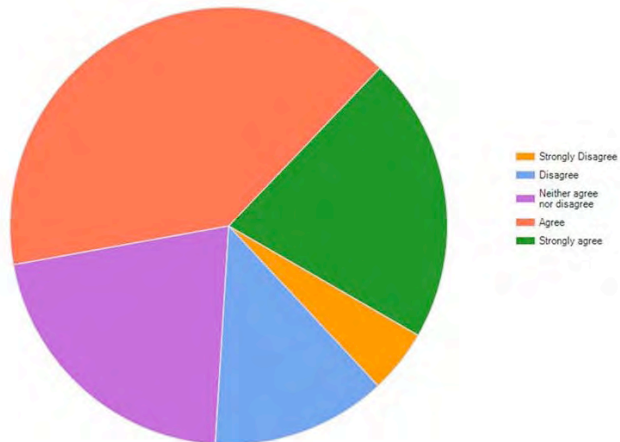
## ► Utilization



The ratio of respondents here shows confidence in GES' potential for widespread utilization, but also highlights the need for a practical implementation plan.

## ► Tiered achievement?

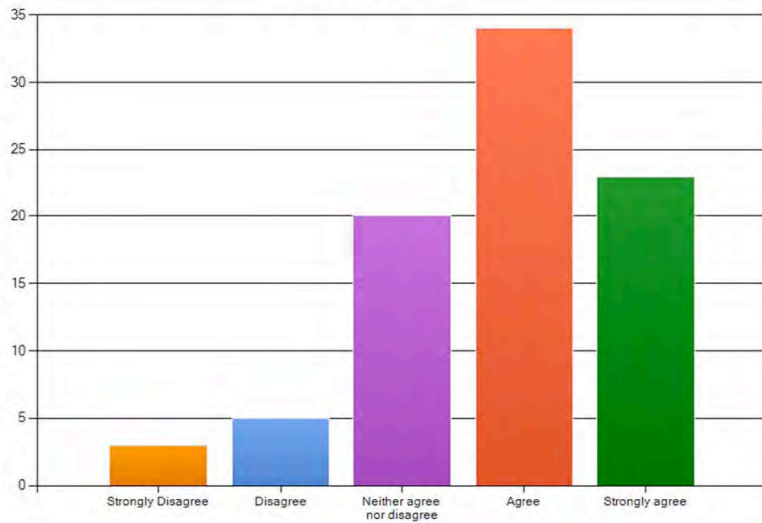
I think that GES should offer a tiered level of achievement for companies (such as bronze, silver, gold levels):



This shows that there is interest in some type of tiered or progressive approach. However, some of the interviews and SAI's experience point to problems with a tiered certification system. In our implementation plan, we will offer an option for progressive implementation by organizations rather than tiered certification levels.

## ▶ Consumer label?

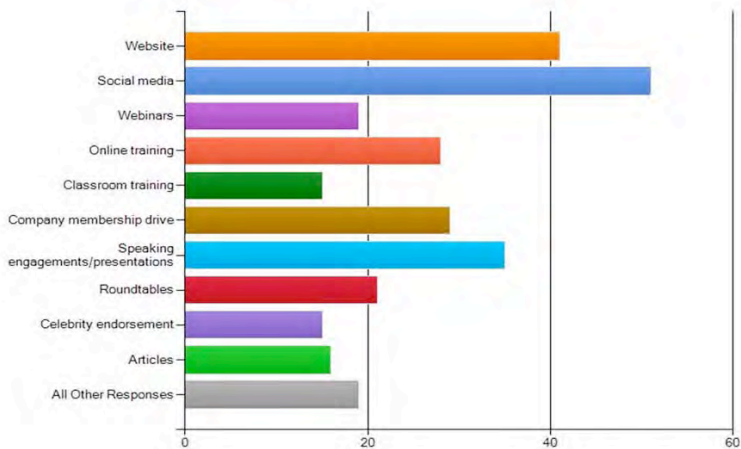
Initially GES will function as a business to business standard. I think it would be useful as a consumer label also:



Initially, GES will be a business-to-business label. However, this shows that there is potential for GES to eventually evolve into a consumer label.

## ► Communication of GES

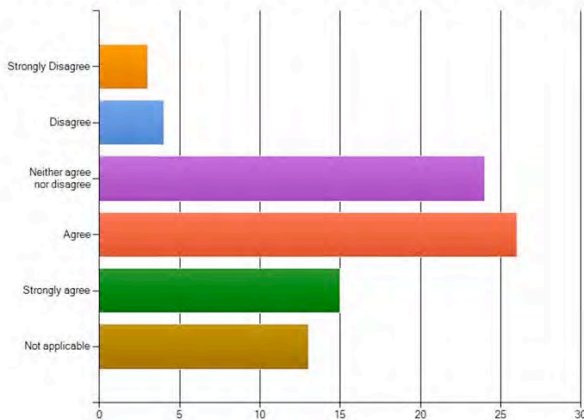
Below is a list of ways that we plan to communicate GES to relevant stakeholders. Please indicate the three you think would be most effective.



SAI will take these responses into account as we develop the implementation plan.

## ► Likely to adopt?

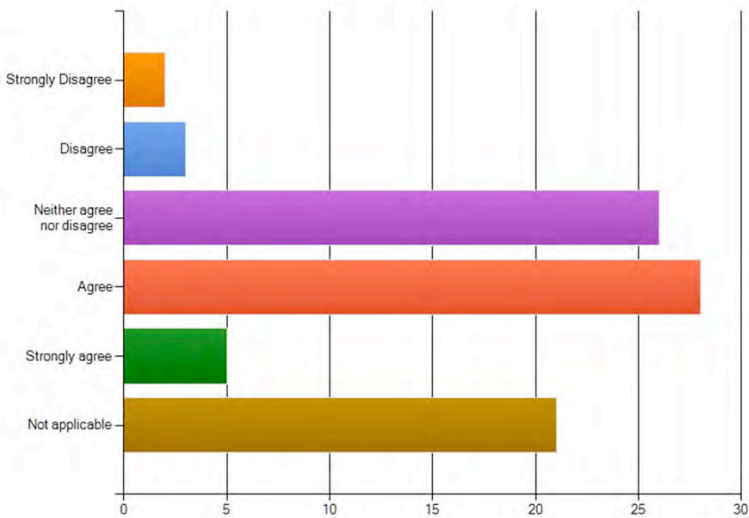
My organization would be interested in implementing the GES standard in our company:



Approximately half of the respondents agree or strongly agree that they would be interested in implementing GES in their organization. We think that a practical and cost-effective implementation plan would increase this ratio even more.

## Implementation

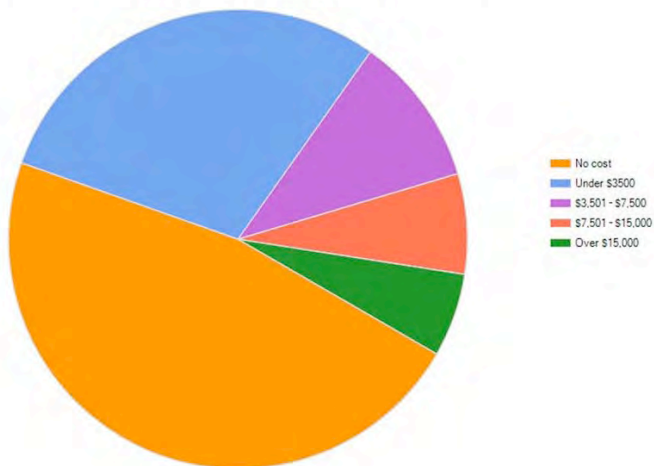
My organization would be interested in implementing the GES standard in our supply chain:



Almost half of the respondents agree or strongly agree that they would be interested in implementing GES in their supply chain. Again, we think that a practical and cost-effective implementation plan would increase this ratio even more.

## ► Cost of implementation

What cost, including preparation, training and certification, would be a realistic range for your organization to be willing and able to pay to implement GES in the first year?



Clearly, the cost will be an important factor in adoption of GES.



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**GES Multi-Stakeholder  
Interview Results**

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## Multi-stakeholder Review Stage 1

Involved 25+ in-depth interviews of:

- Brands/retailers/suppliers
- Academics
- Trade Unions
- NGOs
- International intergovernmental agencies
- Certification bodies

Individual interviews on GES with targeted stakeholders

## ▶ Stage 2

Collation of interviewee input produced feedback on:

- GES standard – specific suggestions for revising the draft
- GES implementation strategy. Suggestions included:
  - Integrate GES with existing initiatives (interagency such as Better Work and WEPS; regional such as in UNDP in Latin America, corporate such as GEES and GEP as well as existing management systems) and collaborate with existing partners (grass root NGOs) particularly in identification of homeworkers and those in informal sector;
  - Create relevant application of GES to different organizations: SMEs, MNCs and cross-sectorally
  - Ensure appropriately trained GES auditors and clear documentation and key impact indicators in GES guidance material for audit
- Identification of participants for possible GES pilots



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**Preliminary Considerations  
for GES Implementation Plan**

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## ▶ Considerations for GES Implementation Plan

- Optimal benefit if GES integrated into existing systems
- Creation of hybrid GES capacity-building and certification program
- Acknowledgement for going through the process and for level of performance

Formulation of implementation plan for GES



## ▶ The Process

Steps based on process. Some recognition at each step:

- Step 1 - Sign up (applicant)
- Step 2 - Self-Assessment (self-reporting)
- Step 3 - Independent Evaluation
- Step 4 - On-site evaluation (integrated into existing audits) and certification



## ▶ Performance Levels



- 5 Mature systems, fully implemented inside and outside the company.
- 4 Fully developed systems with improving utilization.
- 3 Systems in development with partial implementation.
- 2 Limited systems with sporadic implementation.
- 1 Little or no awareness, systems or interest.

## ▶ Managing the process

- Driving companies to improve - Publicly post companies at each step, and time at that step, so that companies do not linger
- Integrating into existing audits - 2-tiered pricing model for on-site (use price as a way to encourage companies to do this as part of integrated audit):. Example:
  - \$X if part of another audit
  - \$5X if stand-alone audit
- Audit teams and auditor competency
  - GES-specific requirements and training for individual auditor competency
  - Auditor training for GES will require knowledge of gender equity issues and management system requirements. This could result in improvements in field auditing for discrimination overall, which does not currently get effectively audited

## GES Multi-stakeholder Interviewees

- Ángel Fraile Corracho, Sustainability Department, Endesa, Spain
- Zeynep Kayaalp, Code of Conduct Regional Manager-EMEA&INDIA at Timberland, Turkey
- Dr Stephanie Barrientos, University of Manchester, UK
- Ritu Kumar, Senior Advisor, ESG, Actis, UK
- Olga Orozco, Managing Director, Operations, Business Social Compliance Initiative (BSCI), Belgium
- Mona Gupta, Management Consultant, Delhi, India
- Modupe Akinola, Assistant Professor of Management, Columbia Business School, USA
- Miriam Neale, Tesco Stores, UK
- Magaly Pineda, Director, CIPAF, Dominican Republic
- Lubna Ansari, Independent Consultant on social audits and training, University of Mumbai, India
- Laura Rubbo, Corporate Citizenship, International Labour Standards (ILS) Department at the Walt Disney Company, USA
- Larissa Luy, Senior Environmental & Social Specialist at International Finance Corporation (IFC), Paris, France
- Joyce Chau, BSCI China, Hong Kong
- Joanne Bauer, Business Human Rights Resource Centre, USA
- Gunelie Winum, European Board of Directors at Social Accountability International; Advisory Group at Capturing the Gains; Head of International Programs at Ethical Trading Initiative – Norway
- Drusilla Brown, Tufts University, USA
- Deborah Leipziger, CSR Consultant and Author, USA
- David Arkless, President of Corporate and Government Affairs, Manpower Group, USA
- Dan Viederman, CEO, Verité, USA
- Caroline Horekens, UN Women, Bangkok
- Carmen Niethammer, Women in Business, IFC, USA
- Anna Nadgrodkiewicz, Programme Officer, Global Programmes, Centre for International Private Enterprise, USA
- Ann Lehman, Policy Director, Department on the Status of Women, City and County of San Francisco, USA
- Ann Goodman, Co-Founder and Executive Director of the Women's Network for a Sustainable Future (WNSF), USA
- Ambreen Waheed, Chair SAForB (South Asia Forum on Responsible Business) & Executive Director RBI-Responsible Business Initiative and Member Standard Governance at AccountAbility, Pakistan
- Cathy Feingold, AFL-CIO, USA
- Lisa McGowan, Solidarity Centre, USA
- Nicole Schwab and Aniela Unguresan (Cofounders) of Gender Equality Project, Switzerland



## ■ **Annex 3 – International Legal Instruments, References and Tools**

### ■ *International Instruments*

Universal Declaration of Human Rights

The International Covenant on Economic, Social and Cultural Rights

The International Covenant on Civil and Political Rights

The United Nations Convention on the Rights of the Child

The United Nations Convention on the Elimination of All Forms of Discrimination Against Women

The United Nations Convention on the Elimination of All Forms of Racial Discrimination

Tripartite declaration of principles concerning multinational enterprises and social policy (4th edition)

UN Women/UN Global Compact Women's Empowerment Principles

ILO Convention 1 (Hours of Work – Industry)

ILO Conventions 29 (Forced Labour)

ILO Convention 87 (Freedom of Association)

ILO Convention 98 (Right to Organise and Collective Bargaining)

ILO Conventions 100 (Equal Remuneration)

ILO Convention 102 (Social Security – Minimum Standards)

ILO Convention 105 (Abolition of Forced Labour)

ILO Convention 111 (Discrimination – Employment and Occupation)

ILO Convention 118 (Equality of Treatment - Social Security)

ILO Convention 131 (Minimum Wage Fixing)

ILO Convention 135 (Workers' Representatives)

ILO Convention 138 (Minimum Age)

ILO Convention 155 (Occupational Safety and Health)

ILO Convention 156 (Workers with Family Responsibilities)

ILO Convention 158 (Termination of Employment)

ILO Convention 159 (Vocational Rehabilitation and Employment-Disabled Persons)

ILO Convention 161 (Occupational Health Services)

ILO Convention 169 (Indigenous and Tribal Peoples)  
ILO Convention 171 (Night Work)  
ILO Convention 175 (Part Time Work)  
ILO Convention 177 (Home Work)  
ILO Convention 181 (Private Employment Agencies)  
ILO Convention 182 (Worst Forms of Child Labour)  
ILO Convention 183 (Maternity Protection)  
ILO Recommendation 90 (Equal Remuneration)  
ILO Recommendation 102 (Welfare Facilities Recommendation)  
ILO Recommendation 111 (Discrimination in Respect of Employment and Occupation)  
ILO Recommendation 116 (Reduction of Hours of Work)  
ILO Recommendation 130 (Examination of Grievances)  
ILO Recommendation 146 (Minimal Age)  
Recommendation 164 (Occupational Safety and Health)  
ILO Recommendation 165 (Workers with Family Responsibilities)  
ILO Recommendation 166 (Termination of Employment)  
ILO Recommendation 191 (Maternity Protection)  
ILO Recommendation 200 (concerning HIV and AIDS and the world of work)  
Resolution on equal opportunities and equal treatment for men and women in employment, adopted by the International Labour Conference at its seventy-first session, 1985

## ■ *Additional References and Tools*

The Gender Equality Project

San Francisco Gender Equality Principles in partnership with Calvert and Verite SA8000®

Social Fingerprint®

Global Reporting Initiative (GRI) ISO 26000

SAI Social Accountability International

OECD Guidelines for Multinational Enterprises

SAAS Procedure 200

## ■ Annex 4 – Roles and Requirements in the Certification System

### ■ *Role of the GES Standard Owner*

GES is a voluntary workplace standard published by UN Women. UN Women emerged as part of the UN reform agenda, bringing together resources and mandates for greater impact. It merges and builds on the important work of four previously distinct parts of the UN system, which focused exclusively on gender equality and women's empowerment:

- Division for the Advancement of Women (DAW)
- International Research and Training Institute for the Advancement of Women (INSTRAW)
- Office of the Special Adviser on Gender Issues and Advancement of Women (OSAGI)
- United Nations Development Fund for Women (UNIFEM)

The main roles of UN Women are:

- To support inter-governmental bodies, such as the Commission on the Status of Women, in their formulation of policies, global standards and norms.
- To help Member States to implement these standards, standing ready to provide suitable technical and financial support to those countries that request it and to forge effective partnerships with civil society.
- To hold the UN system accountable for its own commitments on gender equality, including regular monitoring of system-wide progress.

GES is based on the principles of core ILO conventions and other international human rights instruments. The Standard is written in concrete, verifiable language and includes management systems requirements to guide employers in their implementation of GES and ensure that it is embedded in day-to-day operations. The human rights element of the Standard sets firm requirements and minimum compliance expectations and the management systems requirements draw on ISO principles of continual improvement to sustainably embed change. As one of the first ground-breaking standards and assessment tools for measuring gender equity in the workplace, it is anticipated that GES will become widely regarded as one of the most rigorous gender equity standards.

The intent of GES is as a tool for meeting international labour standards, national labour laws and international human rights norms and protecting and empowering women within an organization's scope of control and influence. Gender equity has been on the development and corporate agenda for a number of years, but progress does not match aspirations. Ensuring the inclusion of women's

talents, skills, experience and energies requires intentional action and deliberate policies. GES extends to those who produce products or provide services for an organization, including personnel employed by the organization itself, as well as by its suppliers (in the case of a company), its contractors, contracted workers and home workers.

As standard owner, UN Women, with the support of SAI, will provide Guidance, interpretation and examples of application of GES' requirements, for auditors and other users of the GES. Guidance is updated along with revised versions of GES and is developed for location, sector and issue-specific questions when the need is communicated to UN Women.

Benefits of GES certification can be categorized into workplace benefits and marketing benefits:

- More and more research supports the premise that gender equity in the marketplace through women's economic empowerment allows women access to employment, income, assets and savings so that they add value to economic activity. Gender disparities prevent women from contributing their diverse skill and talents to the national pool of human resources and cause businesses to risk functioning at a suboptimal productivity and returns rate.
- Marketing benefits of GES certification will be primarily on a business-to-business level in the beginning. Ongoing research will be conducted about the potential for expansion to a consumer label. Many multi-national corporate buyers will recognize the GES certification as part of their Corporate Code of Conduct and seek to have their suppliers certified. The GES certification will be integrated into existing labour code and standard audits.

### ■ *Role of Accreditation Agencies*

Accreditation is the process by which formal recognition of competence is given to qualified organizations, known as CBs, who are then granted the ability to perform certifications. Certification of compliance to GES and other verification codes is available only through qualified CBs granted accreditation.

The importance of the accreditation agency is the assurance through the CBs of consistency of the GES audit even it is being conducted as part of an audit whose basis varies (for example because it is a code of conduct audit as opposed to a labour audit against a standard such as WRAP or SA 8000).

CBs need to be accredited to assure stakeholders that they are able to consistently, reliably and effectively perform certification audits and that these audits are carried out in a professional manner. The accreditation agency sets strict standards and oversight procedures for accreditation of qualified organizations to certify against GES within its scope. The accreditation process includes documentation review, site

audits and observation of auditors in the field. The accreditation agency undertakes impartial assessment and surveillance of CBs to ensure that the accredited certification process is functioning and meets the criteria. The accreditation agency maintains a public list of accredited CBs and certified facilities.

### ■ *Role of Certification Bodies*

The Certification Body (CB), or the organization of which it forms a part, shall be legally identifiable. A CB that is part of an organization involved in functions other than certification shall be organizationally identifiable within the related organization. Where the CB also supplies other services, the relationship between the certification function and other functions must be clearly defined and separation maintained.

The CB shall retain authority and shall be responsible for its decisions relating to certification, including the granting, renewing, suspending and withdrawing of certification.

The CB shall include in its operating procedures a description of the specific gender equity certification processes for which it is accredited, and the sequence in which they occur. The CB shall perform internal audits of those certification activities using a process approach compliant with ISO 19011:2011.

Where a CB has multiple offices involved in the gender equity certification system, the following conditions shall be fulfilled:

- a. The CB shall use a common management system requiring use of the same procedures for all its offices in the delivery of certification to the GES Standard.
- b. One of the CB staff shall be designated to interface with the accreditation agency. This designated staff will be the direct contact with the agency and will be responsible for the control of all gender equity certification related activities, except where necessary for scheduling and logistics. The office where this designated staff is based shall be visited annually.

The CB procedure for client, interested parties and organization and worker complaints shall encompass at a minimum a documented investigation process, corrective action system (including root cause analysis, preventive action and systemic corrective action) and a record of each complaint and its resolution. The accreditation agency shall be notified of each such complaint received within one month of receipt and will be appraised of its subsequent investigation and resolution.

In order to avoid conflict of interest, CBs, whose related bodies have provided GES or similar human resources management system consulting services within

the prior two years to a particular organization shall not contract as a CB for that organization or any of its sites. This restriction includes related bodies of the same parent organization or affiliates, where the validity or reliability of an audit can be questioned because of a consulting relationship.

Note: Consulting is the provision of documentation development, or assistance with implementation of management systems to a specific organization. Training in a public forum is not considered consulting nor is an introductory session such as a 1-day awareness program at a client's location.

GES has been created as a hybrid certification system and the pre audit steps referred to earlier will be conducted before the initial audit is undertaken by the CB.

The CB shall have a documented procedure to ensure the continuing effectiveness and competence of its GES auditors and technical advisors. This procedure shall include an internal witness audit process, verification of continuing professional and educational development and the initial and continuing authority for the approval or rejection of the CB's auditors. This procedure and process shall be approved by the accreditation agency.

CBs shall maintain, as a minimum, the following records:

- a. copies of scheduled audits showing time and assigned auditors
- b. auditor qualification records
- c. the quotation file to the organization, including the audit days and how they were calculated and audit day fees
- d. notes/minutes from stakeholder consultations
- e. the audit plan (agenda) demonstrating auditor itinerary details, time frames, subjects (processes) covered, and personnel involved
- f. the final audit report, including the opening and closing meeting attendance records, positive reporting notes and checklists completed by each auditor and the audit team recommendation regarding certification
- g. copies of all nonconformities issued, surveillance audit reports, follow up reports and other documentation leading to the verification of the effectiveness of the correction of the nonconformities
- h. audit logs/notes as maintained by each audit team member
- i. a copy of the certification decision process
- j. a copy of the certificate issued
- k. the audit team members' initial assignment approval and continuous performance evaluation

l. client, interested parties, organization and worker complaints including the actions taken to resolve them

m. a register of all GES certified organizations to which CBs have granted GES certificates.

All the records specified above, stored in hard copy or electronically, must be readily accessible during an office assessment by the accreditation agency. This must be considered when establishing a decentralized office. The records specified above shall be retained for the life of the associated certificate plus at least 3 years.

Records shall be accessible at the designated office and remain legible, readily identifiable and retrievable. These documents must also be made available to the accreditation agency to allow adequate review and oversight and to provide appropriate evidence of compliance by the CB and its personnel.

While documents should be in English and other common languages, some smaller, regional organizations may maintain documents in their local language due to cost containment. In such cases, appropriate translation must be made available to assure that representatives from the accreditation agency have the ability to evaluate the documents effectively. The CB shall maintain an effective procedure that defines the controls for the identification, storage, protection, retrieval, retention time and disposition of records.

## ■ *Auditor Competency Requirements*

### ■ **AUDIT TEAM REQUIREMENTS**

I. Lead Auditors:

The CB shall evaluate all lead auditors in the process of qualifying them to perform GES audits and regularly thereafter and shall have evidence available to demonstrate the competence of each one. Each such auditor, as a minimum, shall be as follows:

- a. qualified by an accredited CB
- b. qualified ISO 9001:2000, ISO 14001 or equivalent lead auditor by an accredited CB or by a recognized auditor CB
- c. trained at courses approved by the accreditation agency
- d. trained, through professional development courses, as a GES auditor to perform audits on gender equity
- e. experienced, demonstrated by having:
  - i) satisfactorily served as a lead auditor on at least three management-systems based certification audits or equivalent

- ii) participated in at least three GES certification or surveillance audits (or equivalent) as a team member.

## II. Team Auditors:

The CB shall evaluate all auditors qualified to perform GES audits and shall have evidence available to demonstrate competence, at a minimum, as follows:

- a. be employed by or under contract to an accredited CB,
- b. qualified ISO 9001:2000, ISO 14001 or equivalent auditor by an accredited CB or by a recognized auditor CB
- c. trained at courses approved by the accreditation agency
- d. trained, through professional development courses, as a GES auditor to perform audits for gender equity
- e. have conducted as a team member at least three management systems based audits
- f. participated in at least one GES audit as an observer.

## ■ AUDIT TEAMS

All GES audit teams shall satisfy the following:

- a. consist of auditors qualified to conduct audits in the name of the CB
- b. have at least one member of the team as a qualified GES lead auditor
- c. have at least one member who is expert in interviewing workers on gender equity and discrimination and who is familiar with local and national labour laws and gender and discrimination-related legislation
- d. have an appropriate gender mix as appropriate based upon workforce demographics
- e. have language skills appropriate to the assignment
- f. have no member of the audit team who has provided consultancy for the client in the two years prior to the audit.

The CB shall evaluate auditor performance at least once every three years in determining effective implementation of GES requirements, including through the internal witness audit process. Such evaluations shall also include feedback from witness audits, post-audit surveys and feedback from organizations audited and their clients.

The CB shall maintain personnel records documenting that auditors have appropriate skills and experience for specific audit teams. This shall include a documented procedure for ensuring auditor possession of appropriate language and interview skills, impartiality and gender assignment.



Audit personnel qualifications related to training, interview expertise and language skills are as follows:

- a. Training requirements: The CB shall document and demonstrate that it satisfactorily ensures that audit personnel, including those (irrespective of job title) who make certification decisions and provide technical assistance to field auditors, are trained and proficient in the elements and application of GES Standard and the GES Guidance Document.

(At minimum, the CB shall demonstrate successful completion by all such personnel of: a GES auditor course accredited or formally approved by the accreditation agency plus such continuing professional development and supplemental educational courses as required by the accreditation agency).

- b. Skill requirements: The CB shall document and demonstrate satisfactory procedures for selecting a qualified team of auditors. Additionally, the CB shall document how it's auditing staff: a) obtains factual information in a manner sensitive to local cultural norms and ensures that any audit team can so conduct employee interviews and b) how it protects the confidentiality of workers who are interviewed.
- c. Assignment criteria: The CB shall maintain personnel records documenting that auditors have appropriate skills and experience for specific audit teams. Where a translator is engaged, the CB shall have procedures to confirm that person's impartiality, including that such translator is not an employee or recent ex-employee of the auditee.

The format for reporting on the results of the audit may be developed by UN Women as standard owner of GES or its designated affiliate. The CB's audit team shall provide a full report according to this format, on the client's activities and operations audited, within 20 working days of each initial, surveillance and recertification audit, unless otherwise agreed by the client. The lead auditor is responsible for ensuring that comprehensive reporting notes and checklists are completed and kept as a record of the audit. The record shall include:

- a. Notations of any decision by the audit team where the team had to accept a deviation from either the law or the GES Standard. This is intended to provide the CB's oversight function with adequate information to accept or reject the decision made.
- b. Include a brief overall description of the facility being evaluated, with some information on the nature of the business, the size, number of employees and make-up of the facility and attach the CB's regional background research materials.
- c. Note the 'interview formats' used—along with reports of information (i.e. number of interviewees per group, number of groups, on or off site).

The accreditation agency shall continue to review and evaluate best practices for auditor and audit team requirements and may issue supplemental advisories on these requirements.

## ■ *Audit Protocol and Guidance*

### ■ AUDIT PROCESS

The GES audit shall be a hybrid system consisting of a pre-audit and audit stage:

- a. Pre-audit (Steps 1-4): An initial self-assessment against the GES Standard undertaken by the organization seeking GES certification followed by independent evaluation by GES Standard owner (UN Women or designated affiliate)
- b. Site audit (Step 5): conducted by certified GES auditor

Certification shall apply to all parts of a continuous process or premises. For example, in a situation with several assembly lines, all must be audited for certification. Similarly, in a continuous process of fabrication and finishing and packaging, the entire process must be compliant in order for certification to be granted.

For multiple site audit schemes (multi-site sampling), sites shall be audited in accordance with defined sampling procedures.

Audit planning and execution shall take into account all workers both on site and off site, including temporary and contract labour. The CB audit plan shall address all elements of the GES Standard at each location and during all shifts (crews) covered by the GES certificate.

The entire management system for GES shall be assessed at a minimum of once every three years. The audit cycle shall be based upon the dates of the initial certification decision. The time interval between initial certification and re-certification or between two re-certification audits shall not exceed three years from issue, except that a grace period of up to 3 months may be allowed with proper documented justification. All requirements of GES shall be audited during the initial audit and re-certification audit.

Each on-site surveillance audit shall include an audit of:

- a. management systems including management review, internal audits and corrective actions as defined by GES
- b. complaints and organization response
- c. worker training and worker awareness on the GES system and its impact on individuals
- d. effectiveness of the corrective actions and verification since the last audit
- e. GEC role and activities to date

Every audit shall include auditing on all shifts (all crews). However, in cases of small companies where only one or two audit days apply, the auditing of all shifts may be covered in surveillance audits during the 3 year period.

The audit plan shall include evaluation of all of the organization's gender equity management system requirements for effective implementation of GES as well as for effectiveness in practice. Assessment shall evaluate the effectiveness of the system, its linkages, its requirements and its performance. Part of the evidence required is the results of internal audits of the organization's social policies and procedures to identify strengths and weaknesses, followed by a management review. The plan shall also be developed in light of information gathered from local and regional experts and stakeholders.

Evaluation of effectiveness of the GES management system includes an assessment of how well the system is deployed, as evidenced by workplace policies, including whether it is implemented within the organization's overall objectives. At least 30% of the on-site audit time shall be used to conduct worker interviews for all audits, including the initial audit, surveillance audits and the recertification audit. Interviews shall include both individual and group interviews.

An audit nonconformity shall include a Corrective Action Request (CAR) and shall have three distinct parts:

- a. a statement of nonconformity
- b. the requirement, or specific reference to the requirement in GES
- c. the objective evidence observed that supports the statement of nonconformity

A major nonconformity is one or more of:

- a. the absence of, or total breakdown of, a system to meet a GES requirement. A number of minor nonconformities against one requirement can represent a total breakdown of the system and thus be considered a major nonconformity
- b. a nonconformity that judgment and experience indicate is likely either to result in the failure of the gender equity management systems in meeting its goals and expectations or to materially reduce its ability to assure control of its policies and directives in the workplace to protect its workers
- c. a nonconformity that poses an imminent threat to the well-being of female personnel

A minor nonconformity is a failure to comply with GES which, based on judgment and experience, is not likely to result in the failure of the gender equity management systems or reduce its ability to assure the ongoing viability and effectiveness of policies and procedures to protect its personnel's rights. It may be one of the following:

- a. a failure or oversight in some part of the organization's gender equity management systems relative to GES which is not systemic in nature
- b. a single observed lapse in following one item of an organization's gender equity management systems

All nonconformities shall be recorded. Nonconformities may not be closed during the audit in which they were issued. The CB shall require the organization to submit root cause analysis and evidence of systemic corrective action for each nonconformity issued.

Gender equity management systems shall not be certified to GES if any open major nonconformities to GES exist. Minor nonconformities may remain open for a specified period, not longer than 6 months, to allow sufficient time to close them effectively.

If an audit must be terminated for lack of proper or adequate system implementation, a re-audit must be done from the beginning of the process.

All GES certified facilities must undergo a surveillance audit every twelve months. Each surveillance audit shall re-examine, in addition to the items mentioned above, additional GES elements, so that all have been re-examined within each three year cycle. The audit report shall clearly show the part(s) of the system that was/were audited.


All CBs will conduct a minimum of one unannounced audit in any three year certification. The second or third surveillance audit will be the mandatory unannounced audit. A major CAR (or persistent issues) may indicate the need for an additional unannounced audit during the period of certification.

Every re-certification audit shall re-assess the effectiveness of the policies and actions defined in the gender equity management systems and the overall effectiveness of the management system in its entirety taking into consideration internal and external changes which may have affected it.

### ■ *Complaint Management and Resolution System*

To ensure an open system and the ability of UN Women to learn about any weaknesses in the system, all certified facilities must have an open complaints and appeals process, through which workers or their advocates can raise concerns about compliance. This requirement is included and detailed in the GES Standard.

The ability to receive and respond to complaints is a critical aspect of ensuring the integrity of the system and continuously improving compliance – both within a given facility and throughout the GES oversight system.



There are two kinds of complaints: a facility-level complaint (on GES compliance) would be directed to the relevant accreditation agency or CB about activities within the scope of accreditation to GES; a system-level complaint that questions the inherent nature of the GES Standard would be directed to UN Women or its designated affiliate. The guidance below details the procedure to be followed regarding a facility-level complaint:

There are several types of facility-level complaints/appeals: complaints received by the accreditation agency from accredited and applicant CBs regarding audit, surveillance, or other client service provided by the accreditation agency; appeals received by the accreditation agency from accredited and applicant CBs against determinations or decisions made by the accreditation agency, including those that lead to accreditation withdrawal or an accreditation not being issued; complaints received from interested parties about the performance of certified facilities and complaints received by the accreditation agency from certified facilities or other interested parties regarding the performance of accredited CBs. Examples of the types of complaints against an accredited CB may include:

- misuse of the GES mark
- failure to identify critical problems at a facility at its GES certification
- failure to properly respond to an appeal or complaint previously filed
- repeated certifications given inappropriately to facilities not conforming to the GES Standard within the scope of accreditation

Any person may make a complaint to the accreditation agency. It may be filed on a confidential basis to protect the anonymity of the interested party, but must include contact information in order to enable follow-up and reporting. The complaint shall include objective evidence which might include significant testimony or documented infractions.

Each accredited CB and the accreditation agency have in place procedures to review appeals and complaints and to initiate, as appropriate, actions to resolve them, including audits – at the facility or CB’s expense, if required. This process shall also include a provision for the complainant or appellant to receive a report of the corrective action taken.

The prime purpose of a complaint investigation is to ascertain whether or not the allegation is accurate, and if accurate, to elicit root cause analysis, corrective action and action to prevent recurrence. All organizations participating in the GES accreditation system shall keep records of complaints and appeals and its responses to each for a minimum of 10 years. Verbal complaints to the accreditation agency will not be accepted. Complaints to the accreditation agency shall be made in writing, and mailed or emailed to the accreditation agency. The complaint shall be fully detailed and objective evidence to the complaint shall be provided. No form

or format for a complaint is required, but a complaints and appeals form may be requested from the accreditation agency and used. In the event that a complaint is made against the senior management of the accreditation agency, it may be sent by the complainant to the Chair of the accreditation Board of Directors.

Complaints will be fully investigated by the accreditation agency, and complainants will be advised of the outcome of their complaint (in writing) once this investigation has taken place. Should allegations of major noncompliance by a CB or at a certified facility be sustained and corrective and preventive actions not taken, the accreditation agency staff will ensure that the CB suspends or withdraws the facility's certification. If the sustained complaint relates to a CB, the accreditation agency will take appropriate measures to suspend or withdraw the CB's accreditation if corrective and preventive measures are not taken.

A facility certified to GES shall have a Gender Equity Committee (GEC) responsible for ensuring that there is a confidential, accessible system for workers to lodge complaints should workers find nonconformities to GES. Complaints may be lodged anonymously, or workers may identify themselves and any co-complainant who wishes to be identified.


A complaint is a worker's first step in alleging nonconformities with GES at his/her organization. He/she should ask the worker representative(s) of the GEC or her/his trade union representative for assistance if he or she feels comfortable doing so. GES provides that lodging complaints will not expose the worker to any risk of reprisal. Nevertheless, the GEC worker representative(s) shall take precautions to assure anonymity if the worker chooses not to identify himself/herself.

The GEC worker representative(s), the worker, or any designated representative of the worker will take the complaint to the management representative(s) of the GEC or to the Gender Equity Coordinator. Management must respond within a reasonable, set period of time. The GEC management representative or the Gender Equity Coordinator will advise what that time period is for the organization.

The GEC should respond on three levels:

1. Root cause analysis to determine why there was a nonconformance with the provisions of GES
2. Corrective action, including remedial action, if requested, and
3. Action to prevent recurrence of the problem

Should the complaint not be resolved to the satisfaction of the complainant, a complaint may then be lodged directly to the CB about the facility, as detailed below. Should the complainant not be satisfied with the outcome of the complaint investigation as managed through the CB, a complaint may be filed directly with the accreditation agency.



If the GEC at a GES certified facility fails to rectify a valid complaint, a complaint may be raised by any interested party (such as a worker, NGO, community group, teacher/professor or trade union) with the CB that certified the facility's compliance with GES. The address of that CB will be on the facility's posted GES certificate, or it can be obtained from the GEC. In investigating the complaint, the CB is charged to protect the identity of the complainant and any person who gave testimony, unless those persons choose to let their identity be known.

The CB is required to provide a detailed report of all complaints to the accreditation agency every six months and such complaints will be reviewed during surveillance audits. Workers and other interested parties are invited to also send a copy of the complaint to the accreditation agency, or to ask their GEC worker representative to do so for them.

Complaints must include documented evidence demonstrating that the facility did not comply with one or more specific provisions of GES. GES provisions by name and number should be specified if possible. The GEC can assist with identifying the provision and assembling the requisite evidence. Evidence can include the signed testimony of workers reporting what they themselves have witnessed.

The complaints shall be reviewed by designated CB staff for relevance to provisions of GES and for inclusion of documented evidence of non-compliance. The investigation may be aided through the undertaking of an unscheduled audit of the facility. The CB shall submit a report to the complainant, with a copy to the accreditation agency, on the conclusion of its investigation.

During a surveillance or reaccreditation audit, or if the complaints originates through the accreditation agency, the Director of Accreditation, accreditation agency audit team, or other designee shall review the results of the CB investigation to determine if the CB followed proper procedures at surveillance audits or at other designated times, as needed. If the Director of Accreditation determines that the investigation was incomplete or insufficient, the Director shall notify the CB and work with it to determine further action, which may include an accreditation agency investigation or other method, as determined.

A complainant not satisfied with the outcome or handling of the investigation may choose to file a complaint against the CB with the accreditation agency.

Any accredited CB or applicant CB may appeal against a decision of the accreditation agency within 30 business days of the initial decision. Those wishing to make an appeal should submit their appeal and supporting evidence to the accreditation agency. Once the accreditation agency receives an appeal, a designee shall be appointed to review the contents. If it is agreed that the appeal is justified, the designee will issue a letter acknowledging acceptance of the appeal, and the accreditation agency shall immediately deal with the issue and issue a decision.

If the initial review of the appeal deems the appeal unjustified, an appeals subcommittee shall be constituted and the appeal shall be forwarded to the accreditation agency appeals subcommittee. The designee shall advise the appellant in writing of the constitution of an appeal subcommittee and the date by which that review will have been completed.

When the committee reaches a decision about whether to accept the appeal, the appellant shall be informed in writing. If the appeal is accepted, then an investigation will take place and the appellant will be notified of its outcome. Each accredited CB and the accreditation agency have in place a procedure to review complaints and appeals, to initiate an audit if required, and to investigate and report to the complainant.

Each certified facility and CB in the accreditation system shall keep records of complaints and appeals and its responses to each for a minimum of 10 years.

#### ■ *Localization of Guidance for GES Standard*

CBs shall have a documented and implemented process to effectively obtain, maintain and use in audit planning and audit process, information about working conditions regularly gathered from regional interested parties, NGOs, trade unions and workers.

Building informational relationships with these interested parties is an ongoing responsibility, not fulfilled by simply offering meeting dates with little advance notification. This communication needs to be ongoing and built on trust – such that stakeholders perceive the auditors to be responsive – in order for this engagement to effectively support the continuous improvement of GES-certified facilities.

Finally, GES accredited auditors are obliged to: 1) provide their contact information to interviewed workers and 2) respond directly to complaints or inquiries regarding the companies that they have certified. These auditor requirements facilitate communication between the auditors and problematic cases in their area of influence.

UN Women, with the support of SAI and local working groups, shall periodically issue guidelines for interpretation of GES criteria that takes national and local law and context into account.



