



Investor's Guide

How to Identify and Mitigate Risks of Harmful Work in Your Investments

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Primary Audience

Investors of Women's Economic Empowerment (WEE) Actors. WEE Actors are entities or individuals that support the development or expansion of women's businesses, provide livelihood or financial services, and/or support women (globally) in efforts to increase their access to economic opportunities, especially those living in developing economies. Investors may choose to implement the tools in this guide themselves, or to request that potential investees fill them out. Potential investees may find it useful to reference this guide to understand the expectations investors may have.

Goal

Build the internal capacity of investors and investees regarding issues of harmful work for children and adults throughout the investment process.

Objectives

Through the use of this guide investors will have:

- Assessed risk of harmful work for children and adults in investment decisions.
- Conducted effective screening and due diligence with investees.
- Adapted language in loan and/or other covenants regarding harmful work for children and adults.
- Monitored risks and reduction of these risks over time with investees.

SETTING THE FOUNDATION
Phase 1

BUILD THE STRUCTURE
Phase 2

ENGAGE PARTICIPANTS
Phase 3



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About the RICHES Project

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

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

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

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

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

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



Figure 1: RICHES Toolkit for WEE Actors



Toolkit for WEE Actors

SETTING THE FOUNDATION Phase 1

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

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

BUILD THE STRUCTURE Phase 2

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

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

ENGAGE PARTICIPANTS Phase 3

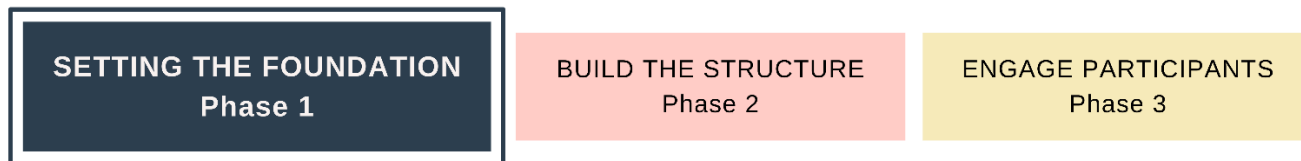
Use these tools to build **participant-level** awareness and support their needs.

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

To access the full toolkit, please consult <https://grameenfoundation.org/riches>.



How to Use the Investor’s Guide



The Investor’s Guide is designed to be part of the minimum practices any WEE investor should implement and is part of **Phase 1: Setting the Foundation**.

Background: Investors that finance banks, social enterprises and community-based financial institutions serving low-income populations (“investees”) have the potential to create positive impact, social change, and sustainability. Yet in contexts where local laws, accountability, or social protection schemes are weak, investments can also trigger unintended harmful consequences regarding harmful work for children and adults to the very people and communities that the investors are trying to help. Investors and their investees are “exposed to the [same] social and environmental risks of the sectors and companies that they decide to finance.”¹ For example, if investors support financial institutions that lend to agricultural micro-enterprises, they can also be impacted by the same social (ex. risk of disability through accidents or exposure to dangerous chemicals) and environmental (ex. deforestation) risks as financial institution and the farmers. If these risks are left unchecked, these social and environmental risks can increase loan defaults, payment rescheduling, devaluation of collateral, negative publicity or liability risks to the investee and investor.²

Moreover, new European Union (EU) regulation, known as the [Sustainable Finance Disclosure Regulation](#) (SFDR), require EU investors to disclose the negative effects their investment decisions or advice they might have, such as environmental, social, human rights, etc. The elimination of all forms of forced and compulsory labor and harmful child work (child labor) are mandatory indicators whereas there are a number of voluntary indicators that address workers’ rights, working conditions and human-trafficking. In addition, in the International Labour Organization’s call to a whole-of-supply-chain approach to address harmful child work,³ assessing risk of harmful child work labor must go beyond immediate suppliers, in this case, beyond the investee and include risks faced directly by the investee’s clients, as it is at these lowest levels of a supply chain that harmful child work is most likely to occur⁴.

This guide introduces practices that investors should use to ensure they and their investees demonstrate intent, commitment, processes, and achievements for mitigating the risks of the unintended harm of investments—in particular, the risk of harmful work for children and adults—in WEE programming.

Important Concepts to Note:

¹Mariño M and Richter P. 2020. [From sustainability commitment to impact – how a social and environmental management system translates intention into action](#). ILO.

²Ibid.

³ILO. 2020. [Next steps to end child labour in global supply chains](#).

⁴[Ending child labour, forced labour and human trafficking in global supply chains](#). ILO, Organization for Economic Co-operation and Development, International Organization for Migration and United Nations Children’s Fund. 2019.



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

Harmful work for adults, or unacceptable conditions of work or UACW, is any work that is considered to be detrimental and is often based on wages (ex. whether work provides a living wage), work time and rest days (ex. hours of work that exceed eight hours a day or 48 hours per week), or harmful working conditions (poor occupational health and safety conditions).

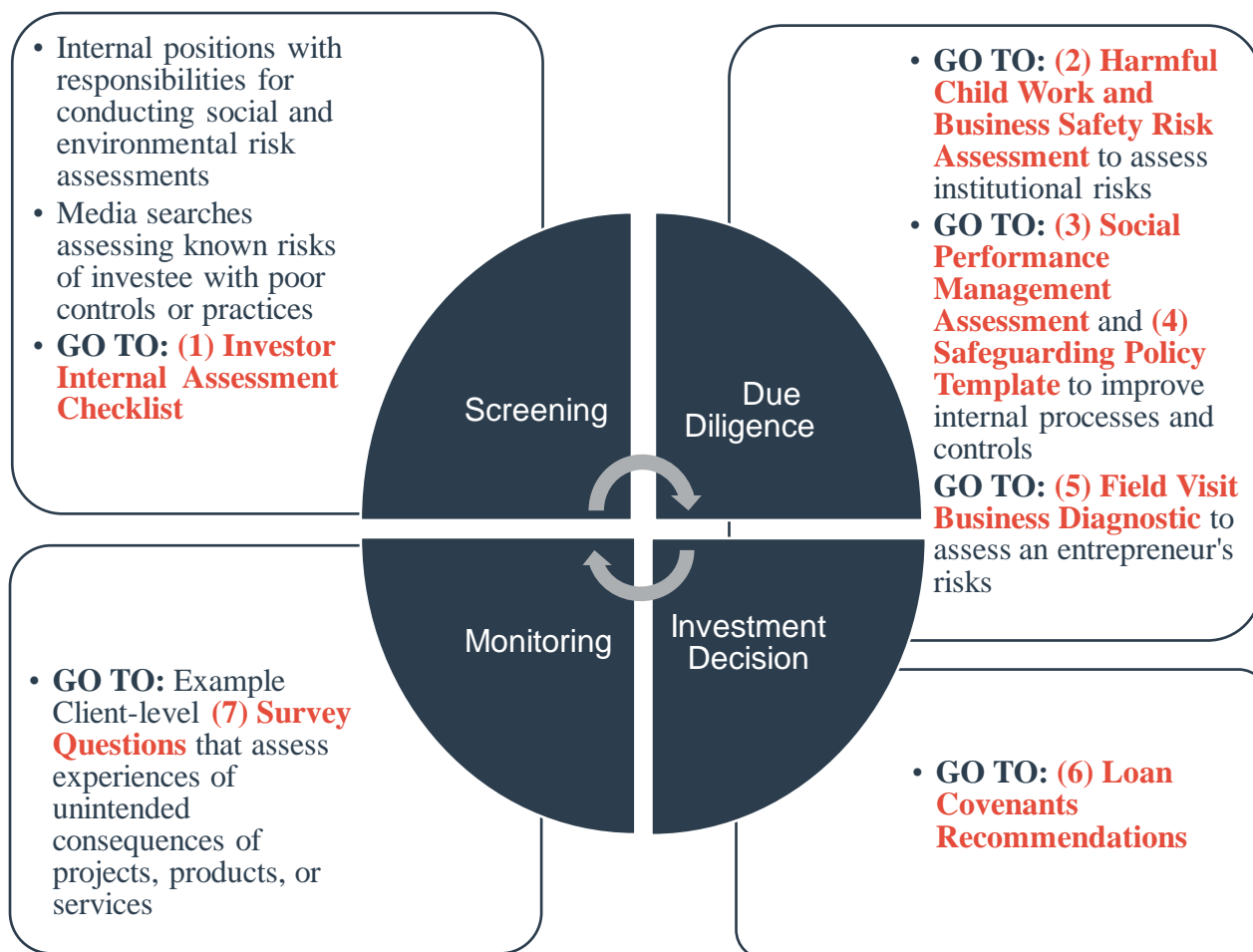
Process Description: The tools in this guide should be viewed as a set of concepts that can be integrated into an investor’s Social and Environmental Management Systems (SEMS). A SEMS is a “management system that allows a financial institution to identify and assess social and environmental risks and impacts (adverse and beneficial), to avoid, minimize, and compensate adverse impacts, as well as to seize beneficial impact opportunities, and to ensure stakeholder engagement across all.”⁵ An important part of a SEMS is the articulation of roles and responsibilities, most often and importantly driven by the board and senior management and integrated throughout all staff’s responsibilities. Therefore, the roles should be clearly defined as to whom will oversee integrating these tools and concepts into an investor’s SEMS.

This guide provides **seven tools** that an investor can use to more fully integrate the concerns of harmful work for children and adults into its investment process and mitigate the risks of harmful work for children and adults. There are tools for screening, due diligence, investment decisions, and monitoring. Figure 2 provides an overview of each tool included in this guide. Each tool has its own specific instructions for use.

In addition to the tools described in Figure 2, this guide references other tools developed as part of the RICHS Toolkit that an investor may promote among its investees. For example, **Tool 3: Social Performance Management Framework for Mitigating Harm** presented in this guide only focuses on the aspects related to harmful work for children and adults whereas the investee version of this tool (Tool 1: Social Performance Management Assessment from the [RICHS Social Performance Management Guide](#) is expanded and also includes promising practices related to gender.

Figure 2: RICHS Investor’s Toolkit by Investment Stage

⁵Mariño M and Richter P. 2020. [From sustainability commitment to impact – how a social and environmental management system translates intention into action](#). ILO.



Materials Needed: While the instructions prior to each tool presented in this guide will reference the specific materials needed for using the tool, you are advised to download the United States Department of Labor (USDOL) “[Sweat and Toil](#)” application, as it is a helpful resource regarding harmful work for children and adults for any given country and it is updated annually with the list of goods that are identified for exploitative labor as well as the specific activities in a supply chain for a good where harmful child work is most prevalent. In addition to the list of goods that have been identified for exploitative labor, this application will note relevant labor laws, basic statistics on the status of children, status of compliance with standards of practice related to harmful child work, and suggested actions for a given country to strengthen their practices. In addition to being a useful tool for quickly learning about harmful child work in a given country, it will be referenced as an application needed to complete **Tool 2: Harmful Child Work and Business Safety and Health Risk Assessments** found in this guide.

Adaptations Applicable for All Tools in this Guide: Each individual tool presented in this guide provides guidance on adaptation, where needed. However, the following adaptations are applicable for all tools:

1. The tools in this guide use the word “firm” to describe an investor’s organization, the words “investee” or “potential investee” to describe those who receive funding from an investor, and the words “client” or “clients” to describe an investee’s clients. The terms “investee” can be replaced with terms used by your firm to refer to an investee and “client” or “clients” can be replaced with



program participants, participants, beneficiaries, entrepreneurs, or other meaningful words prior to filling this out.

2. All guides and training materials within the RICHES Toolkit have been designed to ensure their accessibility, particularly for differently-abled individuals. For this reason, this tool has been developed in Microsoft Word, using at a minimum 12-point font, and graphics and tables have been labeled with alternative text. You may wish to adjust the sizes of the tables to allow for notetaking or adjust the font size if printing out.

Languages: The guide is currently available in English. If any of the individual tools highlighted in this Guide are available in other languages, they will be noted within the tool itself.



Screening

Tool 1: Investor Internal Assessment Checklist

Purpose: To help an investor rapidly assess how its own internal policies and practices for screening, conducting due diligence, pursuing, and monitoring investments adequately address the risks of harmful work for children and adults.

Process Description: To quickly assess your firm, fill out the checklist. For any answer of *No*, guidance is provided to support your firm in improving internal capacity. Even if the answer is *Yes*, management may wish to compare their practices to those recommended in the checklist and with the referenced tools found in this guide. This will help you identify immediate concepts and tools that can be integrated within your SEMS to positively respond to the questions. Management should consider leading the completion of this tool and corresponding activities that stem from it.

Materials Needed: This tool can be printed out, completed on paper or online.

Time Needed: Five to 30 minutes may be needed depending on knowledge of the firm's processes.

Adaptations Needed: No adaptations anticipated.

Cost Drivers in Use of Tool: Staff time.

Risks to Consider: No known risks.

Languages: This tool is available in English.



Investor Internal Assessment Checklist				
Phase	Questions	Answers		Guidance
		Yes	No	
GENERAL	Does your firm have a person/position whose job description includes responsibility for managing (identifying, assessing, addressing, and monitoring) the risks of harmful work for children and adults in your investments and/or building capacity of staff for conducting social and environmental risk assessments on these topics?			It is important that someone one is assigned the responsibility for managing (identifying, assessing, addressing, and monitoring) the risks of harmful work for children and adults in your investments. It is equally important to have a clear person assigned to build capacity of staff on these topics. Responsibilities can also be spread across different functions, including a sustainability and environmental officer, investment officer, and relationship manager.
SCREENING	Does the screening of a potential investee cover risks of harmful work for children and adults?			<p>Conducting simple media and internet searches on your potential investee, including any combination of the following search words may reveal positive or negative information that could influence an investment: “child labor”, “harmful child work”, “child abuse,” “forced labor,” “strikes,” “clashes,” “fines,” “non-compliance,” “fines for incompliance with labor laws,” name of country and/or name of investee, and “microfinance.”</p> <p>Screening tools should include a box to indicate the general potential risk of harmful work for children and adults in the type of business activities to be financed and related supply chains, as relevant. For example, for investees that primarily lend into a specific supply chain, for example, cocoa, child labor would need to be evaluated as a risk down to the smallholder cocoa farmer. For investees that lend to a wide array of clients representing many value chains, screening may need to focus primarily on the vulnerability of the investee’s clients and the potential for child labor.</p>



Investor Internal Assessment Checklist			
Phase	Questions	Answers	Guidance
DUE DILIGENCE	Does your firm conduct or require your potential investee to conduct a risk assessment on the potential risks for the proceeds of your investment contributing to or exacerbating risks of harmful work for children and adults?		See Tool 2: Harmful Child Work and Business Safety Risk Assessment for an example of a risk assessment that your firm or your potential investee could adopt.
	Does your firm conduct or require your potential investee to perform an assessment on their social performance management policies and practices?		See Tool 3: Social Performance Management Assessment . This tool provides an example assessment that can be completed by your firm or an investee to evaluate investee policies and practices aligned with intent to do no harm. See Tool 4: Safeguarding Policy Language for an example of policy language that can be used by your firm or your investee regarding practices for assessing and mitigating potential harm of harmful work for children and adults.
	Does your firm conduct onsite client-level visits as part of your due diligence process?		See Tool 5: Field Visit Business Diagnostic for an example of a business safety and health diagnostic that can be used during an in-person visit with investee clients.
INVESTMENT DECISIONS	Does your firm require loan covenant language related to practices and policies the investee should have to be in compliance with your investment practices?		See Tool 6: Loan Covenants Recommendations , for example loan covenant language that covers harmful work for children and adults.



Investor Internal Assessment Checklist				
Phase	Questions	Answers		Guidance
MONITORING	Does your firm have standard or proposed indicators that investees can use to measure and report on client-level outcomes related to unintended consequences like harmful work for children and adults?			See Tool 7: Example ‘Unintended Consequences/Negative Coping Mechanisms’ Survey Questions that can be integrated into existing data collection activities or used independently.



Due Diligence

Tool 2: Harmful Child Work and Business Safety and Health Risk Assessments

Purpose: To raise the awareness of investors of the possible risks to harmful work for children and adults within specific contexts and investments and to encourage action among investors and investees.

Investors need to know whether an investment is at risk of creating or exacerbating cases of harmful child work. Some information is already readily available, and updated annually, to inform which sectors, value chains and business types are at risk of harmful child work. Also, enabling environments, such as poverty rates and covariate shocks that may be experienced by an investee's clients, are additional indicators of potential risk. This tool is designed to be used by investors as a starting point for identifying whether the risk of harmful child work and harmful business practices is high within a specific country, a specific WEE Actor's program, products, or services, and/or within client or beneficiary businesses.

Process Description: The Harmful Child Work and Business Safety and Health Risk Assessments can be integrated into due diligence questionnaires and completed either individually by the investor and investee or completed together during in-country due diligence visits. Prior to using Part 1 of the tool, you are advised to download the United States Department of Labor (USDOL) "[Sweat & Toil](#)" application, which highlights the goods that have been designated by the U.S. government as experiencing harmful child work, to assist with answering the questions posed. An investor may wish to independently complete some questions, such as those in Part 1 that focus on harmful child work, that can be easily answered using Sweat and Toil. If your firm supports numerous investees based in one country, conducting the assessment for one investee will speed up the process for subsequent investees as some answers will remain the same as they are country-level data points.

If the investee is encouraged to complete Part 1, they too should be encouraged to download the [Sweat and Toil](#) application or consult the [USDOL Child Labor](#) report for their country to assist in answering the questions.

After completing Part 1, complete Part 2 of the tool that focuses on Business Safety and Health Risks. Part 2 will require more engagement by the investee since most data will rely on their management information system (MIS) data or consultation with investee management-level or frontline-level staff.

After completion of both Part 1 and 2, review the guidance provided under "What does my score mean?"

Materials Needed: A printer and/or copier and copy paper for printing the assessment. Also, a downloaded version of [Sweat and Toil](#) is recommended.

Time Needed: Approximately 15 minutes if all answers are known. It is estimated a maximum of 30 minutes would be needed to complete the assessment once data requirements are met.

Adaptations Needed: No adaptations are needed prior to the tool's use. While using the tool, country- and context-specific answers to the questions will assess the risks of harmful work for children and adults for a particular investee. The questions are posed as if the investor is completing the tool; however, if the questions are shared as-is or integrated into an existing due diligence questionnaire, the questions may need to be adjusted from "investee" to "your organization." The interpretation of the results or Next Steps are

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also written as if the implications are for the investee to consider, but broadly, it is assumed that an investor may encourage an investee to consider the recommendations or require them to do so through the contractual agreement. Also, the term “client” is used to represent an investee’s beneficiaries, but this can be revised to reflect terms used by the investor, such as “participant”.

Cost Drivers in Use of Tool: Cost drivers are a minimal amount of printing (though this tool can also be filled out on a computer) as well as investor and investee staff time.

Risks to Consider: No known risks.

Languages: While the Investor’s Guide is only available in English, the tool presented here is also available in French and Spanish. Please see the [RICHS Risk Assessments](#) for these translations. Please note that when using these translations, the adaptations mentioned above for this tool, specifically, as well as for this guide, generally, will likely be needed. For example, the Investor’s Guide uses terms like investee and client more than service provider/organization and participant, which are terms used in the [RICHS Risk Assessments](#).



RICHES Risk Assessments

Instructions

There are two parts to the Risk Assessments. **Part 1** covers the risks to harmful child work (child labor). **Part 2** covers the business safety and health risks for adults and children within women’s businesses.

For each Question, circle the number that corresponds with your answer of *Yes*, *Maybe*, or *No*. Guidance for answering the questions are provided in the *Help?* column. The *Supporting Information* column should be used to add specific qualitative or quantitative answers to the Questions. There are questions in italics to help prompt the supporting information you may need.

After completing all questions, add up each column based on the weights provided in each column. Once the final score is calculated, compare the number to the risk category that corresponds to your answers located below the table. For any answer of *Maybe*, your firm (and your investee should follow-up and validate its answers so that the final assessment relies simply on *Yes* or *No* answers.

After arriving at the final score, review the interpretation and next steps for the level of risk identified for your investee.

Part 1: Harmful Child Work (Child Labor) Risk Assessment					
Questions	Yes	Maybe	No	Help?	Supporting Information
1. Is my organization located in a country where harmful child work is known to occur in specific sectors?	2	1	0	See USDOL’s “ Sweat and Toil ” application or other national surveys and studies. In the “Sweat and Toil” app, select your country and review the goods identified for exploitative labor. You can also select “Report PDF” and review Section I of the country report.	<i>What sectors are identified for your country (i.e., agriculture, mining, jewelry-making, etc.) for having exploitative labor?</i>
2. Are any of my program participants living or working in an area where there are high rates of poverty?	5	2	0	Poverty increases the likelihood that harmful child work is used as a coping mechanism. Since poverty is relative, consider using the following benchmark to determine whether the answer is <i>Yes</i> , <i>Maybe</i> , or <i>No</i> :	<i>What is the poverty rate among your participants?</i>



Questions	Yes	Maybe	No	Help?	Supporting Information
				<ul style="list-style-type: none"> The percent of participants living in poverty (as established by national or international poverty lines) mirrors or is greater than the national poverty incidence, (ex., 30 percent of participants are poor and national average is 30 percent). You might consult the UNDP Global Multidimensional Poverty Index (click on your country and review the poverty statistic) or the World Bank poverty statistics (click on your country and review the poverty headcount ratio for the most current year). If your organization collects its own poverty data, such as through the use of the Poverty Probability Index (PPI), consult your management information systems (MIS) or program data. 	
<p>3. Are any of my program participants living or working in an area where one or more of the following high-risk situations are occurring—economic crisis, health</p>	5	2	0	<p>High risk situations increase the likelihood that harmful child work is used as a coping mechanism.</p> <p>See your organizational MIS or program data, if available, or rely on management and frontline staff observations. Conduct</p>	<p><i>What types of risks are participants exposed to?</i></p>



Questions	Yes	Maybe	No	Help?	Supporting Information
crisis, drought/flood or other natural disasters, armed conflict, school closure, food insecurity, etc.?				additional assessments, if needed.	
4. Do any of my program participants work in agriculture or own agriculture-related businesses?	5	2	0	<p>Agriculture is the highest-risk sector for harmful child work.</p> <p>See your organizational MIS or program data, if available, or rely on management and frontline staff observations. Conduct additional assessments, if needed.</p>	<i>What percentage of your participants work in agriculture?</i>
5. For sectors at greatest risk of harmful work for children identified in question 1, do any of my program participants have businesses in those sectors or that provide related services to those sectors (aside from agriculture)?	2	1	0	<p>For sectors noted in Question 1, for example, if jewelry-making is identified as a high risk sector for harmful child work (or exploitative labor), what percent of the participants have jewelry-making businesses or develop products for or sell products from jewelry-making businesses? See your organizational MIS or program data, if available. Conduct additional assessments, if needed.</p>	<p><i>What sectors are they?</i></p> <p><i>What percent of participants have businesses in those sectors?</i></p> <p><i>What services do they provide?</i></p>
6. Do any of my program participants rely on children below age 15 (their own or other children) to help them in their business?	10	5	0	<p>The presence of children below age 15, whether present during school or outside of school is a risk factor for harmful child work. While age 15 is an international minimum standard legal age for work, each country will have national</p>	<i>What does my MIS or program data say about the number of employees that are or are not family members?</i>



Questions	Yes	Maybe	No	Help?	Supporting Information
				<p>standards and possibly specific allowances for children under age of 15, such as allowances for light work (which is work that does not affect a child’s development nor their participation in school). You can find out more about the standards for your country using the “Sweat and Toil” app and selecting your country, then “Legal Standards” or selecting the “Report PDF” and reviewing Section II to see what standards have been set for minimum ages for different types of work.</p> <p>You will primarily need to rely on field staff answers, but, if the organization’s MIS or program data tracks numbers of participant employees and whether those are family or non/family, this data may be helpful in answering this question.</p>	<p><i>What do my frontline staff say about their knowledge of children assisting in the business?</i></p>
<p>7. Do any of my program participants rely on children (below age 15) to help take care of other children or adults in the household, or take care of other household responsibilities while</p>	10	5	0	<p>See the organization’s MIS or program data or rely on frontline staff answers. Conduct additional assessment, if needed.</p>	<p><i>What do my field staff say about their knowledge of children assisting at home?</i></p>



Questions	Yes	Maybe	No	Help?	Supporting Information
adults are working?					
8. In my country, is the percentage of children ages 5-14 who are attending school below 80 percent?	2	1	0	<p>The UN Sustainable Development Goals (SDGs) suggest all children (girls and boys) should complete primary and secondary education as a means for social upward mobility and to escape poverty. If children are not attending school between ages 5-14, then there is an increased risk they are in situations of harmful child work. While the SDGs seek for all children completing primary and secondary school, UNESCO estimates suggest the global average for out-of-school youth in primary and lower secondary school is around 12 percent. For this reason, a threshold of 80 percent has been set for comparing country-level statistics to the global average of education attendance.</p> <p>See USDOL’s “Sweat and Toil” application for your country and select the “Statistics” tab or selecting the “Report PDF” and review Section II or</p>	<p><i>What is the percent of children ages 5-14 who are attending school?</i></p> <p><i>Is it well known that children drop out of school at a young age in the area where your organization is located?</i></p>



Questions	Yes	Maybe	No	Help?	Supporting Information
				consult other resources as World Bank EdStats , UNICEF Education Dashboard , or the USDOL Child Labor report.	
9. Do program participants in my service area often lack the ability to send their children to school, daycare, or other before and after school programs? This could be due to transport or supply costs, or other limitations.	4	2	0	Local frontline staff can share their impressions to answer this question. Local organizations serving in this space can provide more specific information as well.	<i>What do I or my frontline staff know about where children go or how they can stay occupied in safe activities while their caregivers are working?</i>
Calculate the weighted score for each column (add up numbers circled in each column).					
Weighted Score: Sum the scores in each column.					
Risk Category	0-4 Low risk of harmful child work 5-45 Medium-to-high risk of harmful child work				

What does the score mean for Part 1?

While not all answers of *Yes* mean that there are risks to harmful child work within your investee’s programs or initiatives or within women’s



businesses, any answer of *Yes* will assist your firm in identifying where there may be potential risks to harmful child work.

Low-Risk: Receiving a low-risk score indicates that the investee is less likely to oversee WEE programs or initiatives or to support women's businesses where harmful child work may occur. This assessment may also mean that for every answer of *Maybe*, additional research/input may be needed to determine the degree of the risk and to clearly determine whether the answer should be *Yes* or *No*.

- **Next step:** Even if the investee is found to have a **low risk of harmful child work** across its initiatives, programs, or among its clients, you should complete *Part 2: Business Safety and Health Risk Assessment* on the next page. In addition, you may want to recommend that the investee consider the RICHES tools in Phase 1 (and in sequence) as described below in Figure 2: RICHES Toolkit for WEE Actors or in the [RICHES Toolkit Index](#). Using these tools will help ensure that the investee can demonstrate, both internally and externally, its commitment to aligning its intent to do no harm with practice, by building management awareness of the risks to children and women's health and safety when supporting women's businesses or WEE activities, by developing internal policies and practices to identify, measure, and mitigate risks to doing harm, and by knowing where to go for help and find resources when harmful child work or other needs have been identified.

Medium-to-High Risk: Receiving a medium-to-high risk score indicates that there are several known risks for harmful child work or that there are several risks that you are unsure about (answered *Maybe* several times) which will require further clarification and/or research. This score will require that the investee use several RICHES tools to better assess, diagnose, and implement actionable next steps to address some of the risks identified. For example, you may seek further clarification to determine why, for example, "there is low educational attendance in the country", but your investee's client data indicates all or most children have graduated from secondary school.

- **Next step: At a minimum,** your investee should complete the tools listed under Phase 1 (in sequence) as described below in Figure 2: RICHES Toolkit for WEE Actors or as described in the [RICHES Toolkit Index](#). This will ensure that the investee can demonstrate, both internally and externally, its commitment to aligning its intent to do no harm with practice, such as by building management awareness of the risks to children and women's health and safety when supporting women's businesses or WEE activities, by developing internal policies and practices to identify, measure, and mitigate risks to doing harm, and by knowing where to go for help and find resources when harmful child work or other needs have been identified. **In addition,** you may want to recommend that an investee review the tools listed under Phases 2 and 3. Specifically, you may wish to recommend they use the tools in Phase 2 such as the [RICHES Market Research Guide](#) to understand the actual risks to and characteristics of harmful child work among their clients or to complete tools in Phase 3 such as *Tool 1: Business Safety and Health Risk Diagnostic for Frontline Staff* in the [RICHES Business Diagnostics Guide](#). By utilizing the tools in Phases 2 and 3, your firm and the investee will more deeply understand the real causes of harmful child work and the key risks to harmful work for children and adults among your investee's clients.



Part 2: Business Safety and Health Risk Assessment					
Questions	Yes	Maybe	No	Help?	Supporting Information
1. Do any of my program participants have businesses that involve the use of dangerous machinery, equipment, or tools, or that involve carrying heavy loads (such as wood, products, etc.) or exposure to other types of injuries, such as cuts?	2	1	0	Participant businesses that may be involved include industrial baking, textile manufacturing, sewing, wood working, car repair or mechanics, masonry, etc. See management information system (MIS) or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
2. Do any of my program participants have businesses that involve the use of pesticides, insecticides, cleaners, dyes, paints, chemical hair products, or other chemicals or biological hazards such as exposure to bacteria (e.g., from animal feces or raw hazardous foods such as meat/fish/eggs) or interaction with animals, insects, etc.?	2	1	0	Participant businesses that may be involved include nail and hair salons, fisheries, farms, or other agricultural businesses. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>



Part 2: Business Safety and Health Risk Assessment					
Questions	Yes	Maybe	No	Help?	Supporting Information
3. Do any of my program participants have businesses that require them to work at high heights, in confined spaces, in prolonged standing or kneeling positions, underground, or underwater?	2	1	0	Participant businesses that may be involved include farming businesses, jewelry-making, fisheries, and restaurants. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
4. Do any of my program participants have businesses that require the use of cooking oil, cooking burners or ovens, open flames or exposure to extreme temperatures or spaces that lack proper ventilation?	2	1	0	Participant businesses that may be involved include restaurants, bakeries, and food kiosks. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
5. Do any of my program participants have businesses that require long work hours, without breaks, or that operate at night?	2	1	0	As documented in the RICHES Pre-Situational Analysis Report , harmful working conditions for adults would include working hours that exceed 48 hours per week, or a week of work that does not include at least one full 24-hour rest day. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>



Part 2: Business Safety and Health Risk Assessment					
Questions	Yes	Maybe	No	Help?	Supporting Information
6. Do any of my program participants have businesses that require fast or repetitive motions, or need extreme eye precision?	2	1	0	Participant businesses that may be involved include sewing and knitting businesses or small workshops (for example, artisanal businesses). See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
7. Do any of my program participants have businesses where they, or their family members, are at risk of mental or physical abuse or, are vulnerable to sexual harassment?	2	1	0	While every business can face these risks, women’s businesses that are ambulatory (such as run out of a cart or by selling on the roadside to travelers) may be at the most risk. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
8. Do any of my program participants have businesses that expose them or their household members to dangers posed by vehicular traffic?	2	1	0	Participant businesses that may be involved include ambulatory food businesses. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
9. Do any of my program participants have children (particularly children under school age or school-age children) present in their	2	1	0	This signals that even if children are not engaged in the business, they can be exposed to all of the risks listed as harmful for adults, and even more so since children’s bodies are still	<i>How often do you feel this occurs and why?</i>



Part 2: Business Safety and Health Risk Assessment					
Questions	Yes	Maybe	No	Help?	Supporting Information
workspaces while they are engaged in work?				growing. This can result in developmental and growth problems or cause illness. Ask frontline staff for insights and input.	
10. Do any of my program participants have businesses which require them to make regular use of personal protection equipment (PPE) (such as masks, gloves, etc.) to protect themselves from harm while performing their work? PPE may be required for risks such as COVID-19 or for protection against physical/biological harm.	2	1	0	Participant businesses that may be involved include agricultural businesses and food-related businesses. See MIS or program data. Ask frontline staff for insights and input.	<i>What sectors or businesses are they?</i> <i>How much of the portfolio does this represent?</i>
Calculate the weighted score for each column (add up numbers circled in each column)					



Part 2: Business Safety and Health Risk Assessment					
Questions	Yes	Maybe	No	Help?	Supporting Information
Weighted Score: Sum the scores in each column.					
Risk Category	0-4 Low business safety and health risks for adults and children				
	5-22 Medium-to-High business safety and health risks for adults and children				

What does the score mean for Part 2?

Many women in developing economies start businesses within their homes due to limited business incubation centers, rural locations, lack of transport and business registration, or low assets and capital to purchase or rent space. To balance caretaking responsibilities with entrepreneurship, women may also bring their children to the business, regardless of whether the location is within the home or at an external location. Moreover, most children within harmful child work situations are working alongside their parents in their economic activities. For these reasons, children and other household members may be exposed to business safety and health risks, whether they are working or not. Therefore, it is important to understand the broad risks that women, their household members, and others may face at the place of business.

While not all answers of *Yes* mean that there are business safety and health risks within an investee’s WEE programs or initiatives or within women’s businesses, any answer of *Yes* will assist your firm or the investee in identifying where there may be business safety and health risks that clients and those working with or near them should consider. For example, if there are businesses that require women to use chemicals, an investee may need to ensure that those clients have awareness of how to reduce their risk to dangerous exposure (do they have they right protective gear, do they store these chemicals in a place that children cannot reach them, and are they stored where there is no risk of accidental spillage or exposure?) for themselves and their children, in particular.



Low Risk: Receiving a low-risk score indicates that the investee is less likely to oversee WEE programs or initiatives or to support women's businesses where business safety and health risks may occur. This assessment may also mean that for every answer of *Maybe*, additional research/input may be needed to determine the degree of the risk and to clearly determine whether the answer should be *Yes* or *No*.

- **Next step:** Even if the investee is found to have **low business safety and health risks** across its initiatives, programs, or among its clients, they should be encouraged to complete the tools listed under Phase 1 (in sequence) as described below in Figure 2: RICHES Toolkit for WEE Actors or in the [RICHES Toolkit Index](#). Using these tools will help ensure that the investee can demonstrate, both internally and externally, its commitment to aligning its intent to do no harm with practice, by building management awareness of the risks to children and women's health and safety when supporting women's businesses or WEE activities, developing internal policies and practices to identify, measure, and mitigate risks to doing harm, and knowing where to go for help and find resources.

Medium-to-High Risk: Receiving a medium-to-high risk score indicates that there are several known occupational hazards within an investee's clients' businesses that may pose a risk to adults as well as to children. A medium-to-high risk score would require you to seek clarification of responses and would require that your firm and investee further assess these risks. For example, if *Yes* was the answer to question 9 regarding the presence of young children in the workspace, but your assessment reveals that while women do have children present in their workspaces while they work, this is on a rare occasion, this would likely indicate a low risk of children being exposed to work hazards. The higher the score, the more the investee should be encouraged to train staff and clients on how to identify business safety issues to mitigate those risks to clients and their children, in particular.

- **Next step:** **At a minimum**, your investee should complete the tools listed under Phase 1 (in sequence) as described below in Figure 2: RICHES Toolkit for WEE Actors or as described in the [RICHES Toolkit Index](#). This will ensure that the investee can demonstrate, both internally and externally, its commitment to aligning its intent to do no harm with practice, such as building management awareness of the risks to children and women's health and safety when supporting women's businesses or WEE activities, developing internal policies and practices to identify, measure, and mitigate risks to doing harm, knowing where to go for help and find resources. **In addition**, you may want to recommend that an investee review the tools listed under Phases 2 and 3. Specifically, you may wish to recommend the investee utilize the tools in Phase 2, such as the [RICHES Market Research Guide](#) to understand the prevalence and characteristics of business safety and health risks for your clients and their children or those in Phase 3, such as *Tool 1: Business Safety and Health Risk Diagnostic for Frontline Staff* in the [RICHES Business Diagnostics Guide](#). By utilizing the tools in Phases 2 and 3, your firm and the investee will more deeply understand the real causes of harmful child work and the key risks to harmful work for children and adults among your clients.

Tool 3: Social Performance Management Assessment



Background: This tool builds on the Universal Standards for Social Performance Management (SPM)⁶ and the Social Performance Indicators (SPI-4)⁷ tools developed for the finance sector, which includes financial service providers that serve low-income populations. SPM refers to the “systems that organizations use to achieve their stated social goals and put customers at the center of strategy and operations. An investee’s **social performance** refers to its effectiveness in achieving its stated social goals and creating value for clients. If an investee has strong SPM practices, it is more likely to achieve strong social performance.”⁸

The **RICHES SPM Assessment** is designed to complement the Universal Standards for SPM to assist an investee in assessing how well it performs against a set of good practices related to protecting clients, particularly female entrepreneurs and their children, from unintentional harm. The standards assess an investee’s intent to do no harm, its leadership’s commitment to do no harm, the processes and practices designed to limit harm, and the outcomes achieved over time. “Do No Harm” is an ethical obligation to make all reasonable efforts to be aware of, mitigate or eliminate risks that communications, outreach, programs, products, services and other activities do not cause physical, emotional, financial, sexual, or spiritual harm of employees, clients or other stakeholders. Do No Harm can also be referred to as “Safeguarding.”

The **RICHES SPM Assessment** also aims to address an investee’s capacity to be gender responsive⁹ in its practices with both staff and clients, given the impact these practices can have on effectively serving women and other marginalized groups.

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

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

Steps:

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

⁶ Wardle L. 2017. The Universal Standards for Social Performance Management: Implementation Guide. Social Performance Task Force (SPTF).

https://sptf.info/images/USSPM_ImplementationGuideEnglishSept2017.pdf

⁷ Cerise. 2021. SPI-4. <https://cerise-spm.org/en/spi4/>

⁸ SPTF. 2021. “What is SPM?” <https://sptf.info/about-us/what-is-spm>

⁹ Gender responsive is defined as approaches that considers gender norms, roles and relations as well as specific needs for women and men and how they affect access to and control over resources. Gender responsive approaches intentionally target and seek to benefit marginalized groups to achieve program goals. The next level, gender transformative approaches, would require stronger indicators that demonstrate an investee’s interest in changing social and cultural norms among their staff and target populations. The indicators are not currently written this way in this tool.



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

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

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

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

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

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

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

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

Adaptations Needed:

- This tool is designed to be applicable for any WEE Actor; however, when there are standards that are specific to any entity that provides or facilitates access to financial services, this is noted with “(If financial service provider)” prior to the standard of practice. At the time of designing this tool, the SPTF organization (manager of the Universal Standards) and Cerise organization (creator of the SPI-4 tool) were undertaking a refresh of the standards and indicators for financial services actors. RICHES tried to align the indicators in this tool with the existing standards and indicators so that any financial service provider completing an assessment could stay aligned with the official



SPI assessment. The indicators in this tool that are aligned with the SPI tool are in **red**. Text in **bold black** are suggestions made by the RICHES project that will provide an investee with a stronger consideration or definition of Do No Harm/unintended consequences, specifically regarding harmful work for children or adults. **A financial services actor undertaking an official SPI assessment should see this tool as supplementary and should focus on the new indicators in bold black, as they are indicators not found in the SPI assessment.**

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

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

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

Languages: While the Investor’s Guide is only available in English, the tool presented here is also available in French and Spanish. Please see the [RICHES SPM Guide](#) for these translations. Please note that when using these translations, the adaptations mentioned above for this tool, will likely be needed. For instance, the Investor’s Guide uses terms like “investee” and “client” more than “service provider”/“organization” and “participant,” which are terms used in the [RICHES SPM Guide](#).



Social Performance Management Assessment

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

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



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



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

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



No.	Standards of Practice	Evaluation	Next Steps
<i>Dimension 2: COMMITTED LEADERSHIP</i>			
	<p>national/local regulations or board policies establish a larger benchmark.</p>		
Board and Management Risk Monitoring Practices			
4	<p>The board uses the following data, provided by management, to monitor client protection/ safeguarding¹⁰:</p> <ul style="list-style-type: none"> • (If financial service provider) Analysis of the risk of client over-indebtedness; • Analysis of client dissatisfaction, client drop-out, results of exit surveys, and client complaints; • (If financial service provider) Interest rates and whether they are responsible interest rates; • Report on the service provider’s systems for data privacy and security, particularly any failures or breaches; and • Reports on any fraud or corruption, including extortion and bribery. 	<p><i>(Where typically found: board minutes or records)</i></p>	<p><i>(See SPTF Resources on Leadership.)</i></p>
5	<p>The board uses the following data, provided by management, to monitor decent work conditions for employees:</p> <ul style="list-style-type: none"> • Employee turn-over rate by gender, at least annually; and 	<p><i>(Where typically found: board minutes or records)</i></p>	

¹⁰ Participant (client) protection and safeguarding are terms that can be used interchangeably through this tool. In the financial services sector, client protection is the most common term used while safeguarding may be used more by non-profit organizations or government entities.



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



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

No.	Standards of Practice	Evaluation	Next Steps
Dimension 3: CLIENT-CENTERED PRODUCTS AND SERVICES			
Client Research and Data Analysis			
1	<p>Before introducing new products, services, or delivery channels, the service provider conducts market research¹¹ that includes gathering the following data about its target clients:</p> <ul style="list-style-type: none"> • Analysis of market share, market saturation, and potential market; • Client profile data, including gender, age, location (urban/rural), and poverty/income level; and • Data on clients' needs, goals, and any 	<p><i>(Where typically found: market research reports, formative research reports, baseline client outcomes research reports, client satisfaction surveys and/or reports, prior project impact reports)</i></p>	<p><i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2, Do No Harm Assessment in Tool 6, both found this guide as well as the RICHES Market Research Guide. See also SPTF Resources on Product and Service Development.)</i></p>

¹¹ Alternative terms used for “market research” can be formative research, pre-situational analysis, baseline research.



No.	Standards of Practice	Evaluation	Next Steps
<i>Dimension 3: CLIENT-CENTERED PRODUCTS AND SERVICES</i>			
	<p>obstacles (including social norms such as caretaking responsibilities; beliefs about women’s roles; past, present, or potential risks experienced, such as those related to traveling or convening to engage with products, services, or programs; engaging household decision-makers; theft, bribery, or extortion; and negative coping mechanisms or experiencing negative consequences) to using products and services/participating in program activities.</p>		
2	<p>The service provider analyzes product use (types and frequency) / program participation by demographic and socioeconomic segments of its clients.</p>	<p><i>(Where typically found: market or product use analysis reports, and project reports)</i></p>	<p><i>(See SPTF Resources on Product and Service Development.)</i></p>
3	<p>The service provider conducts client satisfaction surveys at least every other year.</p>	<p><i>(Where typically found: client satisfaction surveys and/or reports, and project impact reports)</i></p>	<p><i>(See SPTF Resources on Product and Service Development.)</i></p>
4	<p>The service provider conducts interviews with dormant and/or exiting clients to look for evidence of product design (or project design) failures.</p>	<p><i>(Where typically found: client exit studies, and client satisfaction surveys and/or reports)</i></p>	<p><i>(See example “Unintended Consequences/Negative Coping Mechanisms” Survey Questions in Tool 2 found in this guide, as well as the RICHES Market Research Guide. See also SPTF Resources on Product and Service Development.)</i></p>



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



No.	Standards of Practice	Evaluation	Next Steps
Dimension 3: CLIENT-CENTERED PRODUCTS AND SERVICES			
	engagement of spouses or other decision-makers, special programs for women, etc.	<i>schedules)</i>	<i>also SPTF Resources on Product and Service Development.)</i>
10	(If financial service provider) <i>The service provider has a list of assets that cannot be pledged as collateral, which includes items that would create severe hardship or significant loss of income earning ability for the client.</i>	<i>(Where typically found: product, service, and program descriptions, operational manuals, and credit policies and/or manuals)</i>	<i>(See the SPTF Resources for resources on appropriate collateral and guarantee policies and practices.)</i>
11	(If financial service provider) <i>The service provider accepts alternative forms of collateral from clients whose gender or age creates barriers to access in the local context.</i>	<i>(Where typically found: product, service, and program descriptions, operational manuals, and credit policies and/or manuals)</i>	
12	The service provider provides (or links clients to) a portfolio or comprehensive products and services that help clients respond to economic risk (i.e., emergencies) and support investment in economic activities.	<i>(Where typically found: product, service, and program descriptions, Memorandums of Understanding-MOU, and contracts with external service providers)</i>	<i>(See RICHS Financial Services Guide, RICHS Linkages Guide, RICHS Risky Business Curriculum, and RICHS Intra-Household Dialogue Guide.)</i>
13	(If financial service provider) <i>The service provider offers products and services for basic needs, such as housing, energy, and education.</i>		
14	(If financial service provider) <i>The service provider offers products and services that help clients maintain stable levels of expenditure despite income fluctuation or emergencies, such as:</i>		



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



No.	Standards of Practice	Evaluation	Next Steps
Dimension 3: CLIENT-CENTERED PRODUCTS AND SERVICES			
18	If the client business is related to sectors known to have high social risks (such as risks to harmful work for children and adults), the service provider conducts additional due diligence to mitigate risk.	(Where typically found: operational manuals, safeguarding policies, and credit manuals)	(See RICHEs Risk Assessments and RICHEs Business Diagnostics Guide . See also United States Department of Labor (USDOL) “ Sweat and Toil ” application, as it is a helpful resource for identifying which goods/sector have been identified as having risks for harmful work for children or adults.)

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



No.	Standards of Practice	Evaluation	Next Steps
Dimension 4: CLIENT PROTECTION			
	Categories. ¹² [Note: Protected Categories are as follows: People over 40 years old; Sex; Race/ethnicity/national extraction/social origin /caste; Religion; Health status, including HIV status; Disability; Sexual orientation; Political affiliation/opinion; Civil/marital status; and Participation in a trade union.]		
2	The service provider informs clients, verbally or in writing, about the prohibited behaviors found in the code of conduct.	(Where typically found: code of conduct, internal controls/monitoring or operational manuals, and training manuals)	
3	If the service provider plans to partner with a third party, it reviews the third party's code of conduct prior to signing a contract to check for commitment to fair and respectful treatment of clients.	(Where typically found: MOUs, and partner/contractor/volunteer code of conduct templates)	
(For Financial Service Providers) Aggressive Sales and Collections			
4	(If financial service provider) The service provider conducts a cash flow analysis that considers income, expenses and debt service related to business and family, and any other sources of revenue, including informal sources.	(Where typically found: operational manuals, credit manuals, and internal audits)	
5	(If financial service provider) The service provider	(Where typically found: code of	

¹² Protected Categories are those established or agreed upon by International Labor Organization Conventions, such as Convention 111 which focuses on Discrimination in Employment and Occupation. For more information on protected categories, see ILO. “[Business, Non-discrimination and Equality.](#)”



No.	Standards of Practice	Evaluation	Next Steps
Dimension 4: CLIENT PROTECTION			
	has internal controls to monitor whether employees are engaging in aggressive sales.	<i>conduct, internal controls/monitoring or operational manuals, and performance reviews.)</i>	
6	(If financial service provider) The service provider's incentive structure does not promote aggressive sales.	<i>(Where typically found: human resources-HR, Employee contracts, and Performance Reviews)</i>	<i>(See the SPTF resources for resources on appropriate collateral and guarantee policies and practices.)</i>
7	(If financial service provider) The service provider's collections policy includes the following: <ul style="list-style-type: none"> • A list of appropriate and inappropriate debt collections practices, including collateral seizing practices; • A schedule for the collections process that allows time for the debt collector to determine the reasons for a client’s default and for the client to find solutions; • The service provider informs the client prior to seizure of collateral, allowing the client to attempt to remedy the default; and • A prohibition on sales of the clients' collateral to the service provider, the staff of the service provider, to their relatives, or to third parties involved in the seizing process. 	<i>(Where typically found: collections policy and code of conduct or operational manuals)</i>	
8	(If financial service provider) The service provider restructures or writes off loans on exception, based on a pre-determined list of cases of specific distress.	<i>(Where typically found: collections policy, refinancing policy, or operational manuals)</i>	



No.	Standards of Practice	Evaluation	Next Steps
Dimension 4: CLIENT PROTECTION			
Data Security			
9	The service provider conducts a risk assessment to identify the data-related risks to clients at least once every two years.	(Where typically found: data privacy or use policy, and contracts or agreements with clients)	(See Do No Harm Assessment in Tool 6 found in this guide, as well as see SPTF resources on data privacy and use.)
10	If the service provider works with third parties that have access to client data, the service provider's agreements specify that third parties will maintain the security and confidentiality of client data.		
11	The service provider explains to clients how it will use client data, with whom it will share the data, and how third parties will use the data. The service provider receives clients' consent before using or sharing their data.		
12	Information about data use and consent is easy for clients to understand: <ul style="list-style-type: none"> • When requesting consent from clients to use their data, the service provider explains in simple, local language, either in writing or orally, how it will use the data. <i>Internet links to disclosure statements are not sufficient.</i> • (If financial service provider) The service provider trains clients on the importance of protecting their personal information including Personal Identification Numbers (PINs), savings account balances, and information on repayment problems. 		



No.	Standards of Practice	Evaluation	Next Steps
<i>Dimension 4: CLIENT PROTECTION</i>			
	<ul style="list-style-type: none"> The service provider gives clients the right to withdraw their permission to use data and explains any consequences of withdrawal. 		
13	The service provider notifies clients of their right to review and correct their personal and financial data.		
Client Grievance Mechanism			
14	Clients have a way to submit complaints to persons other than their community agent/loan officer/program or product officer .	<p><i>(Where typically found: whistleblower policies, safeguarding policy, complaints mechanism documentation such as that found in human resources training manuals for employees on complaints mechanism and training schedules)</i></p>	<p><i>(See SPTF resources on complaints mechanisms.)</i></p>
15	The service provider has at least two complaints channels that are free of charge and accessible to clients.		
16	The service provider informs clients how to submit a complaint (including the types of complaints or concerns that customers can report, such as sexual harassment, negative consequences of product use/program participation such as pulling children out of school or reducing food consumption) .		
17	The service provider's complaints policy identifies levels of severity and requires that severe complaints are escalated immediately to senior management.		
18	The service provider's complaints mechanism ensures that all formal complaints are registered in a secure system that reaches the complaints handling		



No.	Standards of Practice	Evaluation	Next Steps
Dimension 4: CLIENT PROTECTION			
	staff and/or management.		
19	The service provider resolves client complaints quickly (within a month of original submission). If the resolution takes longer than one month, the provider notifies the client of the reason for the delay.		
20	Management reviews complaints reports and key performance indicators (e.g., average time to resolve and percent resolved) and takes corrective action to resolve systematic problems leading to complaints, at least once annually.	<i>(Where typically found: safeguarding policy, and management meeting notes)</i>	
21	If the service provider partners with third parties, the service provider helps its clients to resolve complaints they have with those third parties.	<i>(Where typically found: safeguarding policy, management meeting notes, and partner/program notes)</i>	

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT			
Hiring and Recruitment			
1	The service provider assesses each candidate's work and personal experience related to the service provider's target clients.	<i>(Where typically found: Job descriptions)</i>	<i>(See example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4, and Code of Conduct Template in Tool 5, all found in this guide. See also SPTF)</i>
2	The service provider assesses each candidate's motivation to achieve the service provider's social goals.	<i>(Where typically found: Job descriptions and hiring practices and policies)</i>	



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



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



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



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



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
	<p>coping mechanisms that debt recovery practices can promote, such as the use of harmful child work, domestic violence, etc.;</p> <ul style="list-style-type: none"> • Confidentiality and data sharing policies and fraud risks, including common frauds, fraud identification, and fraud reporting; and • How the complaints mechanism works, how to resolve complaints against third party service providers, and how to treat clients respectfully during the process. 		
17	Employees receive training on gender sensitivity, inclusivity, and harassment and violence.		
Employee Grievance Mechanism			
18	The service provider has a formal grievance mechanism that allows employees to raise workplace concerns in a confidential manner.	<i>(Where typically found: code of conduct, safeguarding policies, whistleblower policies, complaints reports, and internal audits)</i>	<i>(For this entire Dimension, see example Gender Policy Template in Tool 3, Safeguarding Policy Template in Tool 4 and Code of Conduct Template found in Tool 5, all found this guide. See also SPTF Resources on HR development.)</i>
19	The service provider has more than one grievance process that encourages the use of both formal and informal grievance mechanisms, as well as external grievance channels, if necessary.	<i>(Where typically found: code of conduct, safeguarding policies, whistleblower policies, complaints reports, and internal audits)</i>	
20	Staff appointed to reviewing grievance mechanisms receive regular trainings on how to conduct investigations and interviews related to harassment claims that ensure accessibility,	<i>(Where typically found: code of conduct, safeguarding policies, whistleblower policies, complaints reports, and internal audits)</i>	



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT</i>			
impartiality, and confidentiality.			
Employee Satisfaction			
21	<p>The service provider surveys employees, at least annually, on satisfaction and concerns with employment conditions. For example:</p> <ul style="list-style-type: none"> • The service provider asks employees for feedback on at least the following topics: workload; work schedule; compensation and benefits; professional development opportunities; communication, participation, and leadership from supervisors; and discrimination based on gender and other protected categories (including treatment by leaders and other staff, and perception of workplace equality such as payment, treatment, and opportunities for advancement). • The service provider disaggregates survey results by gender, position, and any other relevant categories. • The service provider shares the survey results with employees. • The service provider gives all outgoing employees the opportunity for an exit survey or interview. 	<p><i>(Where typically found: employee satisfaction surveys/reports)</i></p>	<p><i>(See also SPTF Resources on HR development.)</i></p>
Employee Performance Reviews and Incentives			



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 5: RESPONSIBLE HUMAN RESOURCE DEVELOPMENT			
22	<p>The performance evaluation includes:</p> <ul style="list-style-type: none"> • Client protection criteria, such as portfolio quality and customer service, including treating clients respectfully and without discrimination. • Social performance criteria, such as ability to recruit target clients, quality of data collection, quality of non-financial services provided, and client retention. 	<p>(Where typically found: HR records and performance review templates)</p>	<p>(See SPTF Resources on HR development.)</p>
23	<p>The service provider reviews incentive schemes to check for negative consequences such as fraud, customer mistreatment, aggressive sales, over-indebtedness, or high employee turnover.</p>	<p>(Where typically found: HR records and management team meeting notes)</p>	

No.	1. Standards of Practice	2. Evaluation	3. Next Steps
Dimension 6: RESPONSIBLE GROWTH AND RETURNS (Primarily for Financial Service Providers)			
Revenue and/or Growth in Client Outreach			
1	<p>The service provider monitors the following data, at least monthly, during times of revenue and client growth:</p> <ul style="list-style-type: none"> • Outreach indicators, including: <ul style="list-style-type: none"> ○ (For financial service providers) Average loan size of new clients; and ○ Share of new clients who are from the service provider's target group. 	<p>(Where typically found: Regular monitoring reports)</p>	<p>(See SPTF Resources on Responsible</p>



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 6: RESPONSIBLE GROWTH AND RETURNS (Primarily for Financial Service Providers)</i>			
	<ul style="list-style-type: none"> • Quality of service indicators segmented by branch, including: <ul style="list-style-type: none"> ○ (For financial service providers) Portfolio at risk; and ○ Number of complaints. • Human resource capacity indicators, including clients per field officer, ratio of internal audit staff to total number of staff, hours of training for new employees (by position), and employee turnover (by position). 		<i>Growth and Returns.)</i>
2	<p>When the service provider identifies growth that is harmful to clients, it takes mitigating action such as:</p> <ul style="list-style-type: none"> • Reducing growth targets; and • (For financial service providers) Applying more conservative loan approval criteria or limiting the total number of loans an individual can have at one time. 	<i>(Where typically found: Regular monitoring reports and management meeting notes)</i>	<i>(See SPTF Resources on Responsible Growth and Returns.)</i>
Investment and Disclosure to Stakeholders			
3	The service provider discusses its social goals with potential equity investors and asks about their planned timeframe for investment and exit strategies to assess alignment on social strategy.	<i>(Where typically found: Investor agreements)</i>	<i>(See SPTF Resources on Responsible Growth and Returns.)</i>
4	The board of directors prioritizes accepting investment offers from investors whose investment strategy is aligned with the service provider's social		



No.	1. Standards of Practice	2. Evaluation	3. Next Steps
<i>Dimension 6: RESPONSIBLE GROWTH AND RETURNS (Primarily for Financial Service Providers)</i>			
	strategy.		
5	The service provider discloses the results of its social audits and outcomes measurement to all stakeholders, upon request.	<i>(Where typically found: Regular monitoring reports, social performance management reports, outcomes or impact reports, and risk assessment reports)</i>	<i>(See SPTF Resources on Responsible Growth and Returns.)</i>



Tool 4: Safeguarding Policy Template

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

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

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

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

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

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

Steps:

Step 1: Review the language in this policy and compare it to your existing organizational policies.

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

Step 3: Update any related policies whose language should also change, such as a Code of Conduct that may be affected by the Safeguarding Policy.

Step 4: Follow internal procedures for policy approvals.



Step 5: While not provided with this policy, the development of an internal process and procedural manual will be needed to provide specific guidance on how to implement the policy. For example, the development of a safeguarding team, revising or activating the complaints mechanism, etc. will need to be explained for Employees to understand how to raise or respond to concerns about adherence to the policy.

Step 5: Share policy and related revised policies and procedure manuals with Employees using existing processes. If no process exists, it will be important to raise awareness and train employees on the concept of safeguarding and the relevance of this policy to their jobs.

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

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

Adaptations Needed: This tool has been designed such that an investee can put their name into the policy, along with articulation of their mission and specific service provider information, objectives, goals, etc. Where the policy can be adapted is noted with ALL CAPS and brackets '[..]'. Most adaptations required are references to internal policies, how the investee references its primary beneficiaries, stakeholders, and contacts for complaints or other internal support mechanisms for employees.

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

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

Languages: While the Investor's Guide is only available in English, the tool presented here is also available in French and Spanish. Please see the [RICHES SPM Guide](#) for these translations. Please note that when using these translations, the adaptations mentioned above for this tool, specifically, as well as for this Guide, generally, will likely be needed. For example, the Investor's Guide uses terms like "investee" and "client" more than "service provider/organization" and "participant", which are terms used in the RICHES SPM Guide and are sometimes used interchangeably.



Safeguarding Policy Template

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

Purpose

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

Scope

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

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

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

Policy Statement

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

At [NAME OF INVESTEE], we believe all people have a right to live their lives free from sexual harassment, exploitation and abuse, workplace, and gender-based violence, bullying, labor exploitation including child labor, trafficking in persons, and discrimination and that no child should be subjected to abuse of any form (collectively “**Prohibited Conduct**”). We believe that Prohibited Conduct, particularly



sexual harassment, exploitation and abuse, and child abuse, are more likely to be exerted over particular groups of people due to inequalities and vulnerabilities, particularly those experienced by women, vulnerable adults and children. We recognize unequal power exists between [NAME OF INVESTEE] Employees and the people we partner and work with through our programs, products, and services and between people within our organization. We expect that our power will not be used to advantage ourselves or cause harm to others.

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

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

Definitions

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

Policy Details

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

Oversight

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



Violations and Penalties

Failure to comply with this SGP and [NAME OF INVESTEE]'s associated Code of Conduct, or failure to comply with the obligation to report conduct that is, or may be perceived as, breaching any section of this Policy, may result in adverse action, including discipline up to and including termination of employment for [NAME OF INVESTEE] Employees and unilateral termination of present and future engagements or business relations for Related Personnel. If the failure to comply also breaches applicable law, [NAME OF INVESTEE] may refer the conduct to relevant law enforcement authorities.

Processes and Procedures

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

Related Policies

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



Policy Annex 1: Safeguarding Standards

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

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

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

Workplace Violence

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

Gender-Based, Bias-Motivated and Domestic Violence

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

Bullying and Harassment

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

Sexual Harassment (SH)

[NAME OF INVESTEE] prohibits SH by [NAME OF INVESTEE] Employees, Related Personnel and Clients. Persons who are sexually harassed are encouraged, but are not required, to inform the harasser that



the conduct is unwelcome and warn them that it is contrary to [NAME OF INVESTEE] policy. Personnel experiencing or observing incidents of SH should inform their supervisor, other management, or human resources or use [NAME OF INVESTEE]'s complaint mechanism. [NAME OF INVESTEE] will take a survivor-centered approach to handling complaints of SH.

Sexual Exploitation and Abuse (SEA)

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

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

As such:

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

Consensual Relationships

Consensual romantic and/or sexual relationships between an employee with supervisory authority and any subordinate, including one not directly reporting to the supervisor, could compromise [NAME OF INVESTEE]'s ability to enforce its policy against sexual harassment. At the same time, a romantic and/or



sexual relationship between [NAME OF INVESTEE] Employees, Related Personnel and a Client would be a violation of [NAME OF INVESTEE]'s policy against SEA. Consequently, if such relationships arise, [NAME OF INVESTEE]'s [LEADERSHIP STAFF MEMBER OR APPROPRIATE UNIT], will consider them in the context of this Policy and take appropriate action. If the relationship is between [NAME OF INVESTEE] Employees, such action may include a change in the responsibilities of the individuals involved in such relationships or transfer of location within [NAME OF INVESTEE] to diminish or eliminate the supervisory relationship and workplace contact that may exist. Any supervisory employee involved in such a relationship is required to report the relationship to [THEIR SUPERVISOR AND/OR HUMAN RESOURCES OR OTHER DECISION-MAKING STAFF MEMBER]. If the relationship is between a [NAME OF INVESTEE] Employee and a Related Personnel or a Client, disciplinary action will be taken with regard to the [NAME OF INVESTEE] Employee involved.

Unintended Consequences of [NAME OF INVESTEE]'s Programs, Products, or Services

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

Standard 2: Child Protection

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

Child Abuse

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

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



Standard 3: Labor Protection and Counter-Trafficking in Persons

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

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

Child Labor and Unacceptable Conditions of Work

[NAME OF INVESTEE] acknowledges that children have the right to be protected from harm. Given engagement with [MICROFINANCE SERVICES/ECONOMIC STRENGTHENING PROGRAMMING/NAME INVESTEE'S SPECIFIC PROGRAMMING] can increase the likelihood of risk to a Client's child or child under their care, such as increased exposure to workplace safety hazards and in the most extreme cases child labor,¹³ [NAME OF INVESTEE] commits to take measures to ensure the safety and welfare of the children and, to the best of its ability, ensure compliance with local child welfare and protection legislation or international standards, whichever gives greater protection. [NAME OF INVESTEE] Employees, along with Related Personnel, will not knowingly [DEVELOP PROJECTS/ PROVIDE LOANS/OTHER SUPPORT SERVICES] or for Clients who use child labor or unsafe work practices that put children or employees in harm's way [AS ARTICULATED IN INVESTEE'S SUSTAINABILITY POLICY/EXCLUSION LIST, IF APPLICABLE. SEE THE [INTERNATIONAL FINANCE CORPORATION EXCLUSION LIST](#) AS AN EXAMPLE]. [PROGRAMS/BUSINESSES] that typically fall into high-risk areas include [NAME THE SECTORS THAT ARE RESTRICTED FOR PROGRAMMING / LENDING].

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

¹³ See [research](#) conducted by the RICHES project which establishes the research base for the relationship between economic strengthening programming and child labor:



Trafficking in Persons

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

Standard 4: Non-Discrimination, Diversity, and Inclusion

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

Standard 5: Safety and Security

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

Standard 6: Privacy and Confidentiality

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

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

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



Standard 7: Whistleblower Protections

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

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

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

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

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

Standard 8: Digital Safeguarding

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

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

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

Tool 5: Field Visit Business Diagnostic

Background: Research suggests investor site visits benefit both the investor and the investee.¹⁴ This tool will help an investor assess harmful working conditions among investee clients during onsite due diligence visits.

¹⁴Hu Y, Shan J, Zhan P. 2020. Institutional Investors' Corporate Site Visits and Firms' Sustainable Development. Sustainability, 12:7036; [doi:10.3390/su12177036](https://doi.org/10.3390/su12177036)



Process Description: The purpose of using this tool is to identify business safety and health risks among investee clients during due diligence visits. Before using this tool, it should be reviewed, adapted, and integrated into an investor's due diligence processes.

To use this tool, follow these steps:

- **Step 1:** Prior to the field visit, print out copies of the tool.
- **Step 2:** Ask the investee to schedule visits with clients. Depending on the characteristics of the clients, recommend that they be chosen to reflect those characteristics. For example, if there are differences regarding micro and small enterprises, urban and rural, or enterprise type (ex. agriculture, petty trading), setting up a site visit is recommended to ensure you visit a client representing each persona.
- **Step 3:** Assess the business using the tool. **Rule of Thumb: If something is dangerous for an adult, it is dangerous for a child.**
- **Step 4:** Once the assessments are complete, work with the investee to identify the priority actions that should be taken and discuss the risks, as well as the possible mitigation strategies that can be explored to improve working conditions among clients.
- **Step 5:** In the Action Plan box, document up to three priority actions that the entrepreneur agrees to take along with a timeline and any resources that may be needed from your organization. (Depending on the commitment of the organization, as well as the financial services that can be promoted/offered to support the entrepreneur's' financial capability to cover the costs associated with the action plan, these action items can be adapted to match that reality.)

Materials Needed: At least 1 printed copy per business visited.

Time Needed: If this site visit tool is integrated into existing due diligence processes, the additional time to apply this tool may be minimal. It is estimated that approximately 30 minutes to 1 hour per business, plus preparation/travel time.

Adaptations Needed: The diagnostic tool is designed to be generic, applying to any business type. However, if there are common businesses that women own, specific examples can be added to Tool 1. [Specific occupational hazard publications](#) often highlight the types of hazards to a worker. A few examples that may be consistent with women's businesses are noted below:

1. [Baker](#)
2. [Farmer, Dairy](#)
3. [Farm worker, Poultry](#)
4. [Diver, Indigenous Fisherman](#)
5. [Hair or Nail Salons](#)
6. [Handler, Animal](#)
7. [Mason](#)
8. [Mechanic, Automobile](#)
9. [Worker, field crop](#)
10. [Seaman/Seawoman, \(Merchant marine\)](#)
11. [Sewing](#)

Businesses where children might work, provided by the [Safe Work for Youth](#) kit developed by the ILO, are noted below.

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1. [Car repair](#)
2. [Construction](#)
3. [Garments](#)
4. [Hotel cleaning](#)
5. [Housekeeper](#)
6. [Restaurant](#)
7. [Small factory](#)
8. [Store](#)
9. [Wood working](#)

The *Promoting and Protecting the Interests of Children who Work* (PPIC-Work) project implemented in Egypt has also provided [business-specific hazards](#) for the following business types: Small Workshop, Bakery, Carpentry, and Restaurant.

The USDOL [Occupational Safety and Health Administration](#) (OSHA) has also provided key risks for Retail/Grocery Stores/Convenience Stores, Food Service/Fast Food, Maintenance, Office/Clerical Work, Outdoor Work, Construction and Agriculture. Given this is US-based, the risks may not cover all risks faced in other contexts.

Cost Drivers in Use of Tool: Costs are minimal if an investor's due diligence process already involved client site visits. The primary cost driver from use of this tool is staff time to make any specific adaptations or integration of the tool into existing site visits tools as well as the time needed to conduct the assessment. In addition, costs for printing the tools is an important consideration.

Risks to Consider: **Caution:** The use of this tool is not meant to be punitive and should be used to facilitate conversation with clients to identify both simple and more complex improvements to the business to reduce the risks of harm to all those involved (or present) in or at the business. The use of this tool, if not properly facilitated or introduced, can cause a client to feel guilty about a situation that cannot be easily changed. Depending on the severity of the risks identified, additional or earmarked financial support may be needed to support investees in addressing the risks. This can be achieved either through raising awareness among investee clients, developing new financial products or services that assist in making business safety improvements, among others. These, and other ideas, can also be explored through the other tools mentioned in the Annex to this guide.

Languages: While the Investor's Guide is only available in English, the tool presented here is also available in French and Spanish. Please see the [RICHES Business Diagnostics Guide](#) for these translations. Please note that when using these translations, the adaptations mentioned above will likely be needed, e.g., the Investor's Guide uses terms like "investee" and "client" more than "service provider/organization" and "participant," which are terms used in the [RICHES Business Diagnostics Guide](#).



Business Safety and Health Risk Diagnostic

Frontline-level Staff: _____
 Participant: _____
 Number of children (18 and under) present: _____

Date: _____
 Type of Business Assessed: _____
 Ages (estimated) of children: _____

Instructions:

Step 1: At the participant’s place of business, discuss and observe each of the safety risks mentioned in Column B, and in Column C mark with an **X** if the risk is observed/present.

Step 2: For all risks that have been marked with an **X** in Column C, note in Column D the **seriousness**, or **priority of action**, using the following descriptions and codes:

- Serious (S): Can cause death, short-term or permanent disability, and/or experienced frequently (daily/weekly)
- Moderate (M): Can cause illness, frequent pain, and/or happens at least once or twice a year
- Low (L): Treatable, temporary discomfort, and/or infrequently/rarely happens

Step 3: Discuss with the participant the possible mitigation strategies for any risks identified and note these in Column E. See the **RULES of THUMB** to the right for the strategies. Each risk below also provides examples of mitigation strategies that can be considered.

Step 4: Once the assessment is complete, review how many of the risks have been marked with an “S”. These should be prioritized first, followed by those with an “M” and then “L.” Develop a plan of action with the participant that considers the participant’s ability to cover the costs of the mitigation strategies.

Rules of thumb for mitigation strategies:

In taking preventive and protective measures, develop mitigation strategies and address the risk using the word **WISE: Warn, Isolate, Substitute, Eliminate.**

Elimination is the most effective strategy, and warning about hazards is the least effective strategy to address risks in a business. Using an example risk of “working at night,” sample strategies are provided in parentheses.


WARN: Communicate about, train, and supervise those working or present at their business to avoid hazards (*Ex. Teach workers to wear high visibility (light colored or reflective) clothing when performing night work; utilize warning lights to bring more attention to nighttime physical hazards.*)

ISOLATE: Put distance or other barriers between workers, equipment, or certain areas to protect workers and others from encountering risks. (*Ex. Social distance, use personal protective equipment (PPE) such as gloves and masks, use gates, barricades, or ropes to block access to worksite areas that are unsupervised at night.*)

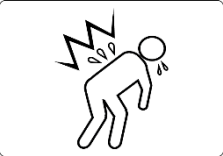
SUBSTITUTE: Make changes to personnel, equipment, supplies, processes, or other factors to decrease risks in the business (*Ex. Substitute lower with brighter lighting to improve visibility in workspaces.*)

ELIMINATE: Completely remove a work task or condition; or stop a specific person, such as a child, from engaging in risky work (*Ex. Eliminate nighttime work performed by children (generally from 8 p.m. to 6 a.m.)*)




Assessment				Recommendations
A. Type of Risk	B. Concerns	C. X if yes	D. If yes, Priority of Action: Serious (S), Moderate (M), Low (L)	E. Possible Mitigation Strategies Proposed actions to take to reduce risk? Remember: WISE Solutions (Warn, Isolate, Substitute, Eliminate)
<p>Physical</p> 	Are there any wet or uneven surfaces?			<i>(Suggestions: Keep floors clean and dry. Where wet processes are used, maintain drainage, and provide platforms, non-slip mats, or other dry standing places. Post warning signs to mark wet or uneven surfaces. Use non-slip footwear. Remove/block uneven surfaces.)</i>
	Are there any extremes in heat or cold present in the business?			<i>(Suggestions: Adjust working temperatures where possible. Improve ventilation, provide plentiful supplies of clean drinking water, and/or provide temporary physical shelter. Even in outdoor work, working hours can also be adjusted to avoid working at the hottest/coldest parts of the day. Provide protective clothing. Provide adequate resting periods where exposure is reduced.)</i>
	Is there any poor lighting?			<i>(Suggestions: Increase natural light with high windows and skylights. Improve the way lighting and work is arranged. Paint walls and ceilings a light color. Keep light sources clean.)</i>
	Is there any exposure to bites/kicks from farm animals?			<i>(Suggestions: Teach animal safety, i.e., do not put fingers near mouths of animals, do not approach from behind or stand behind an animal.)</i>
	Are there any unsafe electrical outlets or wires present?			<i>(Suggestions: Make electrical improvements in the business. Ensure appropriate grounding of electrical machinery/appliances. Create barriers to minimize children’s access to and use of outlets and wiring.</i>


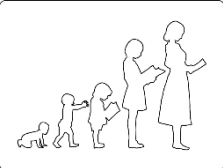


<p>Physical</p> 	Are there any power or cutting tools present/used in the business?			<i>(Suggestions: Mark hazardous equipment, tools and supplies with warning labels and providing training to adults on proper use. Do not permit children access to hazardous machines, instruments, and substances. Give children hand tools that are age-appropriate and sized to fit them. Train children to use machines and tools safely.)</i>
	Is there any exposure to vehicles or other machinery?			<i>(Suggestion: Keep children at a safe distance from vehicles that are in operation.)</i>
	Is there any loud, repetitive noise or vibration present in the business?			<i>(Suggestions: Enclose the machine. Create a sound barrier between it and anyone present. Provide protective equipment such as ear plugs.)</i>
	Does the work involve any repetitive motions?			<i>(Suggestions: Provide workers a chance to move around and change position. Limit children and pregnant women’s exposure to repetitive work.)</i>
	Is there any lifting/carrying heavy loads?			<i>(Suggestions: Train workers to lift heavy objects using their legs or to share the burden with other adults. Break up loads into smaller loads. Use carts and trollies to move heavy loads. Make sure storage shelves are the right height for children. Do not let children use mechanical lifting equipment. Prevent children from carrying heavy loads by breaking them up or having them share the burden with another person, i.e., carry together.)</i>
	Is there any use of awkward postures?			<i>(Suggestions: Provide footrests and platforms for all workers who are short. Give children a chance to move around and change position. Place tools and controls so they can be reached without reaching, bending, or twisting the body.)</i>
	Is there any potential contact with biological			<i>(Suggestions: Provide a place for washing and changing so workers can wash right after handling farm animals, their supplies, or anything in the areas where they live and roam, as well as prior to and after</i>

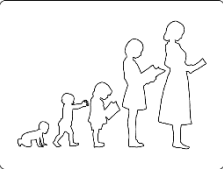



<p style="text-align: center;">Chemical</p> <div style="text-align: center;">  </div>	<p>waste/germs and viruses (animals or plants)?</p>			<p><i>contact with customers to limit the spread of illnesses, such as COVID-19. Do not let children 5 years of age or younger handle or touch chicks, ducklings, or live poultry.)</i></p>
	<p>Is there any potential exposure to poor sanitation?</p>			<p><i>(Suggestions: Promote good hygiene. Provide a place for washing and changing so workers do not take dangerous substances home. Supervise handwashing of children. Provide clean drinking water and personal protection equipment, such as masks, gloves, and hand sanitizers. Specific to COVID-19: move workstations outside where there is better ventilation, and work to maintain at least 2 meters between workers and/or customers for effective social distancing.)</i></p>
	<p>Is there any potential contact with toxic chemicals?</p>			<p><i>(Suggestions: Don’t allow children to mix, handle, or use hazardous chemicals. Store toxic/hazardous chemicals in a safe place. Replace a dangerous substance with one that is safe.)</i></p>
	<p>Is there any potential contact with cleaning solutions, dyes, pesticides, or fertilizers?</p>			<p><i>(Suggestions: Label containers of hazardous substances. Ensure that hand sanitizers and other hand-cleaning solutions have been approved by local health departments and are not toxic. Train children on risks associated with cleaning, and don’t allow them to mix, handle, or use hazardous chemicals.)</i></p>
	<p>Is there any potential contact with crop or mineral dust?</p>			<p><i>(Suggestion: Agricultural or household dust can be moistened and then swept up to limit exposure. Vacuum large particles of dust. Do not allow children near mineral dust.)</i></p>
	<p>Is there any potential contact with smoke or exhaust or poor ventilation?</p>			<p><i>(Suggestion: Ensure ventilation. Move smoke/exhaust source to an open area. Purchase upgraded materials, solar cook stoves, etc. Move workstations outside, where possible, to limit exposure to COVID-19. Restrict children’s exposure and rotate adult workers to limit exposure.)</i></p>



<p>Emotional</p> 	<p>Is there any exposure of workers to abuse (sexual, physical, financial, and emotional) or humiliation?</p>			<p><i>(Suggestions: Ensure there is adequate lighting throughout the work areas and that none are working alone or far away from others. Know how to report and log incidents of threats or violence. Create a safety plan when dealing with unsatisfied customers, robbery, or theft. Know where to turn for help by keeping emergency numbers nearby. Remove children from exposure/limit contact with customers. Model positive communication with children in front of customers. Talk to children periodically to make sure that they are not facing problems. Keep an eye on children to detect changes in their behavior, mood, and motivation.)</i></p>
	<p>Is there any exposure to stress?</p>			<p><i>(Suggestions: Create a positive work environment. Discuss and agree to the volume of work and the pace of work. Give children some measure of control, i.e., where to sit, when to take a break.)</i></p>
<p>Growth and Developmental</p> 	<p>Is the business owner pregnant or are any of her workers pregnant?</p>			<p><i>(Suggestions: While pregnant, women should limit their exposure to chemicals.)</i></p>
	<p>Does a pregnant woman come into contact with any chemicals, or is she exposed to any physical threats that could put her or her unborn child in danger?</p>			<p><i>(Suggestions: Consider leveraging other adult workers to handle chemicals while a woman is pregnant and breastfeeding or providing PPE to mitigate chemical and/or physical risks, such as gloves, masks, helmets, shields, goggles, etc., ensuring that this equipment is properly fitted, and its use is appropriate during pregnancy/breastfeeding.)</i></p>
<p>Growth and</p>	<p>Are children subjected to long work hours?</p>			<p><i>(Suggestions: Reduce work hours, split the child's workload across multiple days, or transfer part of the child's workload to an adult worker to stay within safe and legal limits. For older children who can</i></p>



<p>Developmental</p> 	<p>Are there any children with too much responsibility (i.e., caring for infants or small children, responsible for money/business activities alone, etc.)?</p>		<p><i>work longer shifts, provide at least one ten-minute break in the morning and afternoon and a longer break at lunch; provide a safe rest area for breaks.)</i></p> <p><i>(Suggestions: Transfer all or part of work to an adult worker. Identify local resources that can assist with caretaking responsibilities, such as care cooperatives.)</i></p>
<p>Educational</p> 	<p>Are there children under the age of ___ (Enter maximum age range for compulsory education, often age 18) present in the business during school hours?</p> <p>Depending on age of child, does the child work more than legally allowed limits (ex. More than 4 hours a day for a child under age 15 or</p>		<p><i>(Suggestions: Shift work hours to allow children to attend school. If tasks must be performed during school hours, substitute children's work with adult labor. If necessary, identify safe, age-appropriate tasks that a child can perform outside school hours. Explore government programs or local services that can support your household in keeping school-aged children in school, or business-support and financial institutions to invest in paying adult workers for the work children are doing.)</i></p> <p><i>(Suggestions: Reduce the number of hours children work to keep them within safe and legal limits, and to allow children adequate time and rest to fully participate in their education. Explore government programs or local services that can support your household in keeping school-aged children in school, or business-support and financial institutions to invest in paying adult workers for the work children are doing.)</i></p>



	more than 8 hours for a child between ages 15-17)?			
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IMPORTANT | No one under the age of 18 should work on the following:

- high structures (roofs, trees, walls) or equipment where they might fall (ladders, scaffolding, steep slopes)
- underground (caves, tunnels, pits) or under water (diving, standing in water or on damp ground for more than a few minutes)
- small spaces (tunnels, boxes, refrigerators)
- alone and away from others, or isolated from parents, adult caregivers, or trusted adults
- lifting heavy items or carrying loads for long distances
- operating or working close to heavy or dangerous machinery, such as equipment that cuts or crushes, equipment that is motorized or powered by an engine, machines that can trap the hand, foot, hair, or garment
- long hours or at night
- with or near toxic chemicals
- places where there is risk of attack going to and from work
- demanding heavy responsibility for others’ safety (such as a young child caring for an infant) or goods (such as a young child manning a business while an adult is absent)

If any of these conditions are identified, immediately address these with the business owner. If at any time a child is in physical danger or is showing signs of deprivation (not enough sleep, food, and clothing), intimidation, or fear that cannot be addressed directly with the business owner, contact: _____.

ACTION PLAN

What mitigation strategies can be implemented as a result of this consultation?	What support, training, resources are needed to fully implement these strategies?	What is the timeline needed to see results?	How will the impact or result of these strategies be measured?



ACTION PLAN

What mitigation strategies can be implemented as a result of this consultation?	What support, training, resources are needed to fully implement these strategies?	What is the timeline needed to see results?	How will the impact or result of these strategies be measured?



Investment Decision

Tool 6: Loan Covenants Recommendations

Background: In 2012, The International Finance Corporation (IFC) published an update to its [Performance Standards on Environmental and Social Sustainability](#). Performance Standard 2 focuses on Labor and Working Conditions within workplaces and supply chains, inclusive of investment supporting actors along a value chain. These IFC Performance Standards influence the investments the IFC makes, as well as with other investors such as the U.S. International Development Finance Corporation (DFC, previously known as OPIC). [Eligibility](#) to receive funds from DFC includes exclusion lists of activities it will not fund, including those that are high at risk of child or forced labor or those that can have adverse impacts on clients. This tool provides example language that can be included in investor loan covenants that is consistent with the IFC principles.

Process Description: This tool is designed such that an investor can integrate the language provided in this tool into contract language, along with articulation of their mission and specific service provider information, objectives, goals, etc.

Materials Needed: Copy of current contract or agreement templates.

Time Needed: The loan covenant language will only take 5 minutes to review. To adapt it verbatim could take up to 1 hour to several weeks depending on how contract language is reviewed and adopted by firm leadership.

Adaptations: Where the standard language can be adapted is noted with ALL CAPS and brackets '[.]'. Most adaptations required are references to internal policies, how the investee references its stakeholders and primary beneficiaries (in this example, reference is made to “Clients” but other words can be used, such as “Participants”), and contacts for complaints or other internal support mechanisms for employees.

Cost Drivers: The primary cost driver from the use of this tool is firm staff time to review and make adaptations to firm contracts.

Risks to Consider: No known risks.

Languages: This tool is currently available in English.



Standard Loan Covenants

The [Project Company/BORROWER] shall

- a) Comply with the IFC Performance Standards, especially its principles set out under Standard 1 related to the assessment and management of social and environmental risks and impacts, as well as Standard 2 related to Labour and Working Conditions; and
- b) Monitor and review procedures to include physical monitoring of downstream borrowers related to environmental, social, and labor risk identification/mitigation plans in addition to including an internal process to report these periodic reviews to senior management.

The [Project Company/BORROWER] and each of its borrowers shall

- c) Observe applicable laws relating to minimum age for employment of children, acceptable conditions of work with respect to minimum wages, hours of work, and occupational health and safety;
- d) Not use forced or compulsory labor, including, but not limited to any form of slavery or bonded labor;
- e) Not employ persons, formally or informally, under the age of eighteen (18) for any work that is economically exploitative, is likely to be hazardous or to interfere with the person's education, or likely to be harmful to the person's health or physical, mental, spiritual, moral, or social development;
- f) Not use the Loan proceeds to make a loan (directly or indirectly) to any downstream borrower that uses such proceeds for a project or investment that employs persons under legal age [AS DEFINED BY NATIONAL LEGISLATION IN THE COUNTRY OF THE WORKPLACE] for any form of labor or under the age of eighteen (18) for work involving hazardous labor activity;
- g) Not use the Loan proceeds to make a loan (directly or indirectly) to any micro-, small- or medium- enterprise (mSME) that violates applicable labor laws and regulations, including those related to the right of association, organization and collective bargaining, forced labor, harmful child work, wages, hours of work, and occupational health and safety; and
- h) Require each Third Party Contractor to comply with the foregoing requirements.



Monitoring

Tool 7: Example 'Unintended Consequences/Negative Coping Mechanisms' Survey Questions

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

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

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

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

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

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

Time Needed: It is estimated that it would take approximately 25 minutes to conduct the survey questions if all the questions are used.

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

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

Adaptations:

- Recall periods for the questions can be adapted based on a WEE Actor's interest in comparing different time periods. A period of six months has been set in the questions below. No more than a one-year recall period is advised. Where these adaptations are needed, these are noted with brackets '[SPECIFY TIME PERIOD, ex. PAST 6 MONTHS]'.



- Where other survey questions adaptations are anticipated, they are also noted in ALL CAPS and with brackets [...]. In most cases, the adaptations needed are the name of the investee, the specific product/service being referenced, and how the investee references its clients. Currently the term Client or Clients is used, but it can be replaced by words such as participants, beneficiaries, or using other relevant terms.

Languages: While the Investor's Guide is only available in English, the tool presented here is also available in French and Spanish. Please see the [RICHES SPM Guide](#) for these translations. Please note that when using these translations, the adaptations mentioned above for this tool will likely be needed. For example, the Investor's Guide uses terms like "investee" and "client" more than "service provider"/"organization" and "participant," which are terms used in the RICHES SPM Guide.



Survey Questions

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

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



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



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



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



Questions	Acceptability	Frequency
Unacceptable Sacrifices		
<p>6. I am going to list a series of strategies a business owner may or may not use to either start, manage, or grow a business. You will be asked your opinion on how acceptable the strategy is to you and then the frequency in which you use the strategy.</p> <p><i>(Note: Since questions may appear repetitive, the words in bold font are how to identify the difference from one question to the next. You may need to emphasize these words when asking the question.)</i></p>	<p>Please indicate on a scale of 1 to 4 how acceptable the strategy is to you. (1 is Very acceptable, 2 is Acceptable, 3 is Not very acceptable, and 4 is Not acceptable at all.)</p>	<p>How often have you had to use this strategy in the [SPECIFY TIME PERIOD, ex. PAST 6 MONTHS]? Please indicate on a scale of 1 to 5 how often you had to use this strategy, where 1 is Never in the last year, 2 is Once in the last year, 3 is A few times, and 4 is Very often in the last year.</p>
<p>A. Asking older children (ages 15-18) to support the business before or after school or on the weekends and holidays</p>	<p>1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all</p>	<p>1. Never 2. Once 3. A few times 4. Very often</p>
<p>B. Asking older children (ages 15-18) to care for others or take over your chores at home before or after school or on the weekends and holidays</p>	<p>1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all</p>	<p>1. Never 2. Once 3. A few times 4. Very often</p>
<p>C. Asking older children (ages 15-18) to support the business, care for others, or take over your chores at home during school hours</p>	<p>1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all</p>	<p>1. Never 2. Once 3. A few times 4. Very often</p>
<p>D. Asking younger children (14 and younger) to support the business before or after school or on the weekends and holidays</p>	<p>1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all</p>	<p>1. Never 2. Once 3. A few times 4. Very often</p>
<p>E. Asking younger children (14 and younger) to care for others or take over your chores at home before or after school or on the weekends and holidays</p>	<p>1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all</p>	<p>1. Never 2. Once 3. A few times 4. Very often</p>
<p>F. Asking younger children (14 and younger) to support the business, care for others, or take over your chores at home during school hours</p>	<p>1. Very Acceptable 2. Acceptable 3. Not very acceptable 4. Not acceptable at all</p>	<p>1. Never 2. Once 3. A few times 4. Very often</p>



Questions	Answer Options
Experience with Investee	
7. Do you feel treated with respect from [NAME OF INVESTEE]?	1. Yes 2. No
8. Have you ever felt like you were treated “differently” (for example, mistreated, slighted, ignored) by [NAME OF INVESTEE] due to your sex and/or other characteristics, including race, disability, national origin, or others?	1. Yes 2. No
9. Have you ever felt threatened (for example, made you afraid of retribution such as withholding a service or loan) by a representative from [NAME OF INVESTEE]?	1. Yes 2. No
10. Have you ever been asked to pay for a bribe from a representative from [NAME OF INVESTEE]?	1. Yes 2. No
11. Have you ever faced unwanted attempts to establish a romantic or sexual relationship with you despite your efforts to discourage it from a representative from [NAME OF INVESTEE]?	1. Yes 2. No
12. If you have a grievance or complaint about services provided by [NAME OF INVESTEE], do you know what to do to file a complaint with or about [NAME OF INVESTEE]?	1. Yes 2. No
13. Have you ever filed a complaint with or about [NAME OF INVESTEE]?	1. Yes 2. No
14. When you filed the complaint or provided input, did you find the processes easy to follow?	3. Yes 4. No 5. Don’t know 6. Not applicable
15. How satisfied are you with how the complaint was resolved?	1. Very satisfied 2. Somewhat satisfied 3. Not satisfied at all 4. Complaint was not resolved
Financial Stress <i>(Note: The questions in this section are designed to let your organization select which financial product is being referenced. Like the questions above regarding coping with use of different financial products, questions 16 and 17 could be repeated for each individual product, if desired.)</i>	
16. How much time did you spend over the last 24 hours thinking about [SELECT: paying your next loan installment, making your next savings contributions,	1. All day 2. More than one hour 3. Less than 1 hour



Questions	Answer Options
making an insurance payment, or making a bill payment]?	4. No time
17. Do you currently feel worried, tense, or anxious about [SELECT: paying your next loan installment, making your next savings contributions, making an insurance payment, or making a bill payment]?	1. Yes, a little worried, anxious or tense 2. Yes, very worried, anxious, or tense 3. No
18. Did you argue with your spouse over finances today?	1. Yes 2. No
19. “How stressed do you feel about your personal finances?” Score from 1-10, where 1 represents low financial stress and 10 represents high financial stress.	1 Very little stress 2 3 4 5 Somewhat stressed 6 7 8 9 10 Very stressed
18. In the last 12 months, how often were you afraid of your husband/partner? Never, some of the time, most of the time?	1. Never 2. Some of the time 3. Most of the time



Annexes

Acronyms

Acronym	Definition
ABA ROLI	American Bar Association - Rule of Law Initiative
IFC	International Finance Corporation
ILO	International Labour Organization
MIS	Management Information System
MSME	Micro, Small, and Medium Enterprises
NGO	Non-Governmental Organization
SDGs	Sustainable Development Goals
SEMS	Social and Environmental Management Systems
SFDR	Sustainable Finance Disclosure Regulation
SPI-4	Social Performance Indicators Tool, Version 4
SPM	Social Performance Management
UACW	Unacceptable Conditions of Work
UN	United Nations
USDOL	U.S. Department of Labor
WEE	Women's Economic Empowerment

Glossary of Terms

Terms for the Investor's Guide

Term	Definition
Child Work	Household chores and forms of legal work, including light work. This type of work does not interfere with schooling. According to international standards, the minimum age for work is 14 or 15, depending on the country, as some developing countries have lower minimum ages for work.
Clients	Clients refer to women receiving services provided by WEE Actors. Clients can be women living in developing economies that own businesses, engage in livelihood activities, are clients of financial service providers, or participate in trainings to increase their access to economic opportunities. Depending on the WEE Actor, they can also be referred to as clients, beneficiaries, or members.
Frontline-level Staff	Frontline-level staff refers to WEE Actor staff who work directly with women to help achieve WEE objectives and are primarily based at the frontline-level. Frontline-level staff may be trainers, community agents, credit officers, social workers, agricultural extension agents, among others.



<p>Harmful Child Work (Child Labor)</p>	<p>Harmful work for children, or child labor, is any work that hinders a child’s development and work that is: a) physically, mentally, or morally dangerous and harmful for children; and b) interfering with a child’s schooling. The term harmful child work is also used interchangeably with harmful work for children or child labor. The RICHES Toolkit also identifies harmful child work as any child work that is Difficult, Dangerous, or Dirty (also known as the 3 Ds).</p>
<p>Harmful Work for Adults (Unacceptable Conditions of Work or UACW)</p>	<p>Any conditions of work that are considered to be detrimental, such as wages that do not provide for a decent living for workers and their families, hours of work that exceed eight hours a day/48 hours per week, and poor occupational health and safety conditions. Harmful working conditions are most present in the informal sector, where many female-run enterprises are run, vulnerable work, such as contract work and work in environments that lack or have limited legal protections, in forced labor, which is the most egregious form of work and is particularly common in domestic work, construction, and manufacturing, agriculture, horticulture, and in the hospitality and sex industries, or precarious work, which includes unstable work situations such as temporary and/or informal work such as the domestic care work sector, the cleaning sector, kitchen work, market work, and manufacturing.</p>
<p>Management-level Staff</p>	<p>Management refers to WEE Actor staff who are primarily based at the headquarters level of the organization and lead strategy and program development and oversight.</p>
<p>RICHEs Toolkit</p>	<p>A collection of tools that seek to assess the risks of, raise awareness about, and mitigate the risks of child labor and harmful working practices among WEE Actors and their clients. The RICHES toolkit includes: an online portal for accessing the toolkit, risk assessments and diagnostics for assessing risks of child labor and harmful business practices, market research and monitoring and evaluation tools, paper-based and video-based dialogue-based curriculum, management and frontline-level staff training, guides for linking out to child protection organizations and facilitating intra-household and community dialogues.</p>
<p>Women’s Economic Empowerment (WEE)</p>	<p>Women’s economic empowerment is a process by which women increase their power to succeed as equal and active participants in the economy. This includes women’s enhanced access to and control of human, economic, and social resources (power over); individual agency to make independent decisions that benefit themselves, their families, communities, and nations (power to); personal assets, including knowledge, skills, self-confidence, resilience, and ability to take and manage risk (power within); and collective assets, such as support services and networks (power with). WEE is critical to achieving gender equality, poverty reduction, economic growth, and other sustainable development goals.</p>



<p>Women’s Economic Empowerment (WEE) Actor or Initiatives</p>	<p>Broadly refers to entities or individuals that support the development or expansion of women’s businesses, provide livelihood or financial services and/or support women (globally) in efforts to increase their access to economic opportunities, especially those living in developing economies. WEE Actors can be microfinance institutions, savings group support organizations, non-governmental organizations, donors, investors, or government programs.</p>
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Safeguarding Policy Template Terms

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



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



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



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

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RICHES Investor's Guide



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