THE KVINNA TILL KVINNA FOUNDATION

PREVENTION AND RESPONSE TO SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT: GOOD PRACTICE HANDBOOK FOR THE PRIVATE SECTOR IN RWANDA

KVINNA KVINNA

Acknowledgments

This Handbook is a revised and adapted version of the Good Practice Handbook on Prevention of and Response to Sexual Exploitation, Abuse, and Harassment (SEAH), authored by Anja Taarup Nordlund (Senior Gender Expert, Nordic Consulting Group) and Johanna Förberg (GBV and SRHR Advisor, Kvinna till Kvinna), for and in collaboration with Swedfund.

Special appreciation is extended to FATE Consulting Ltd, whose leadership in adapting this Handbook and associated tools to the Rwandan context was instrumental in ensuring its relevance and applicability. FATE Consulting provided technical expertise in aligning the content with local legal frameworks, institutional mechanisms, and social realities. Their engagement also included the contextualisation of case studies, refinement of the SEAH risk assessment model, and development of practical mitigation tools tailored to private sector actors in Rwanda.

This Handbook reflects a collaborative effort among diverse partners committed to gender equality, human rights, and responsible business conduct. Drawing on international standards, Rwandan policies, and field experience, it provides practical, actionable guidance for private-sector actors in fostering safe and inclusive workplaces and communities. It offers specific guidance on integrating SEAH prevention into context analysis, risk assessment, and business operations. It also highlights the vital role external stakeholders especially local women's rights organisations can play as partners in this work. Involving them strengthens risk identification, enhances mitigation strategies, and builds community trust.

List of Abbreviations

ACHPR	African Charter on Human and People's Rights
AU	African Union
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CSR	Corporate Social Responsibility
E&S	Environmental and social
ESAP	Environmental and Social Action Plan
ESG	Environmental, Social and Governance
GBV	Gender-Based Violence
IFC	International Finance Corporation
ILO	International Labor Organisation
KPIs	Key Performance Indicators
MIGEPROF	Ministry of Gender and Family Promotion
NGO	Non-Governmental Organisation
NPPA	National Public Prosecution Authority
NST1	National Strategy for Transformation 1
NST2	National Strategy for Transformation 2
RIB	Rwanda Investigation Bureau
SEAH	Sexual Exploitation, Abuse and Harassment
SDG	Sustainable Development Goal
UNGP	UN Guiding Principles on Business and Human Rights
UNSCR 1325	United Nations Security Council Resolution 1325

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1. Introduction

Sexual exploitation, abuse, and harassment (SEAH) remain critical human rights challenges in Rwanda, which is linked to unequal power dynamics and gender discrimination. Within the country's growing investment and project sectors, these risks can undermine personal safety, community trust, and the sustainability of development efforts.

The Good Practice Handbook on the Prevention of and Response to SEAH has been developed to assist Rwandan organisations, particularly private sector companies, in integrating effective SEAH risk management into their operations and partnerships.

Grounded in international standards and aligned with Rwanda's legal framework on gender-based violence and human rights, the handbook provides a practical framework tailored to the realities of the private sector. It clarifies what SEAH can be in workplace and community settings, underscores the importance of prevention and response to meet Rwanda's legal obligations and societal expectations, and offers tools for identifying and mitigating risks.

Including local case studies, diagnostic tools, and adaptable action plans, this handbook aims to support Rwanda's diverse private sector companies in fostering safer, more equitable environments that promote sustainable and inclusive development.

While it draws on good practices and international standards, not all recommendations may be immediately feasible for smaller enterprises with limited capacity or resources. Rather than serving as a rigid compliance manual, this handbook is intended as a source of inspiration and guidance, adaptable to different organisational contexts.

2. What is sexual exploitation, abuse, and harassment

Sexual exploitation, abuse, and harassment (SEAH) is a form of Gender-Based Violence (GBV) that involves acts that hurt, threaten, violate, force, or restrict a person based on a gendered power structure. SEAH in the workplace is unwanted, intimidating, offensive and illegal behavior that is harmful. Gender equality in the workplace is linked to lower risks of SEAH, as it fosters an inclusive understanding of all people's equal values. Individuals in vulnerable situations, such as those migrating due to conflict, climate change, or poverty, are at higher risk of SEAH.

Victims of SEAH can be both women and men, and the perpetrator may be a man or woman. SEAH occurs in all layers of society and can involve individuals irrespective of socio-economic status, education level, age, ethnicity, sexual orientation, religious beliefs, and other parameters. SEAH can occur between persons of the opposite sex or the same sex, but in most cases it is perpetrated by men with women/girls as the target. GBV, including SEAH, often increases further in fragile contexts, such as areas experiencing conflict, economic crises, natural disasters, resource scarcity, and pandemics.

Sexual exploitation in the workplace involves abuse of vulnerability, power, or trust for sexual purposes, including threatening or profiting from the exploitation of another person, such as transactional sex. This can involve offering money, gifts, or jobs in exchange for sex; withholding services; blackmailing; threats of sexual exploitation; and

sextortion, which is only one form of sexual corruption.

Sexual corruption occurs when someone abuses entrusted authority to obtain sexual favors in exchange for a service or benefit tied to that authority. It requires three elements:

- Abuse of power for personal gain
- Quid pro quo exchange of service/ benefit for favor
- Sex as the currency

This definition holds regardless of whether the benefit is a right or undue advantage, whether it involves extortion or bribery, or who initiates the exchange, emphasizing the duty of those in power to act fairly.

Sexual abuse in the workplace involves physical intrusion of a sexual nature, either by force or under unequal conditions. This can include unwanted acts like kissing, touching, or threats, and includes all sexual activity with a minor, as they are legally incapable of consent.

Sexual harassment in the workplace involves unwelcome advances, requests for favors, and other sexually explicit behavior that creates an intimidating or offensive environment. Examples include unwanted touching, leering, suggestive

comments, explicit pictures, invitations, intrusive questions, excessive familiarity, insults, physical contact, and explicit emails or text messages.

According to the International Labor Organisation (ILO) Convention 190:
"The term 'violence and harassment' in the world of work refers to a range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment."

2.1. Key SEAH risk factors

The following section outlines key internal risk factors that may increase the likelihood of SEAH incidents.

2.1.1. Internal SEAH risks

A company's internal SEAH risks are influenced by how its workforce is structured and organised,, particularly in terms of composition, culture, and leadership. These risks can be assessed through indicators like gender balance and diversity. High- risk situations include:

- Gender imbalances in management: Minority managers may feel isolated or pressured and may avoid raising sensitive issues;
- Gender imbalances in the workforce: Employees in the minority group may be more vulnerable to pressure or exclusion;
- Lack of diversity in the workplace: Limited representation across gender, age, ethnicity, or socio-economic background affects where and how people work, reinforcing power imbalances and silencing voices;
- Predominantly young workforce: Young employees may lack awareness of rights and confidence to report SEAH, making them more vulnerable to exploitation by older or senior staff;
- Isolated or remote offices: Distance from head office can lead to unchecked sub-cultures, with managers feeling less accountable and less equipped to handle SEAH issues properly;
- Other risk factors include normalising sexualised banter and alcohol consumption, which may be harder to detect in other sectors.

CASE STUDY: Part 1 – WHAT

Title: "She Was Just Trying to Earn a Living"

Uwera, a 20-year-old woman from Nyagatare District, had completed her Senior Three and, like many young women in her rural community, was struggling to find employment. Through a neighbor, she was introduced to a small family-owned catering business in Kigali that specialised in supplying food for events and offices. The owner offered her a job as a kitchen assistant, with a promise of RWF 40,000 per month, meals during shifts, and shared accommodation with other staff.

At first, Uwera was happy to have a job, but after two months, the situation began to deteriorate. The business owner, a 45-year-old man, started making inappropriate comments laced with sexual innuendos. Uwera felt uneasy but didn't know how to react, especially given the power dynamics at play. His behavior gradually escalated, he began brushing against her unnecessarily and touching her inappropriately when they were alone in the kitchen. When Uwera tried to avoid him, he warned her not to speak out, threatening to fire her and "send her back to the village with nothing."

Afraid of losing her only source of income and uncertain of who to trust, Uwera remained silent. She feared being blamed or not believed, especially since she had no formal employment contract. Eventually, after a particularly distressing encounter, she fled the workplace and sought refuge with a friend from the village who has been living longer in the city. The friend connected her to a local civil society organisation that supports victims of Gender-Based Violence.

The organisation provided Uwera with trauma counselling, medical assistance, and helped her file a complaint with the police. However, because there was no written contract and the employer was a well-known and respected figure in the local business community, her case was dismissed for "lack of sufficient evidence." With nowhere else to turn, Uwera returned to her home district, emotionally scarred, unemployed, and still unsure of her rights as a worker.

3. Why prevention and response to SEAH matters

Private sector companies should take action to prevent and respond to SEAH because it is a basic human right, a legal requirement in Rwanda, and increasingly expected by stakeholders such as customers, partners, funders, and communities. Proactive efforts can also lead to financial benefits, including better workplace environments, stronger recruitment and retention, and enhanced brand reputation – all of which are linked to higher profitability.

3.1. Human rights

Human rights are safeguarding the right to live a life free of violence, discrimination, and SEAH at work, to and from work, and at home. This is expressed in various international and regional conventions and treaties.

The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) was adopted in 1979 and came into force in 1981. It admits that women continue to face discrimination and underlines the violation of human rights and dignity. The Convention mandates nations to take steps to guarantee women's full growth and advancement, including the exercise of human rights and basic freedoms on an equal basis with men. Rwanda ratified CEDAW through Presidential Order No. 431/16 of 10 November 1981.

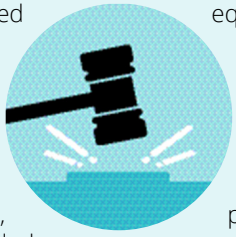
As a signatory to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), Rwanda has enacted key policies including the 2003 Constitution, the Revised National Gender Policy (2020), Vision 2020, the National Strategy for Transformation (NST1), the GBV Policy, and the Second National Action Plan for UNSCR 1325 (2018–2022).

Complementing CEDAW's objectives, the ILO Convention No. 190 is the first international convention to acknowledge everyone's right to a safe and harassment-free workplace, including gender-based violence and harassment. It defines violence as behaviors causing harm, including gender-based violence. The Convention covers all workers, sectors, and work-related contexts. It emphasizes state obligations to respect the right to a safe work environment. Prevention is emphasized through policies, awareness-raising, and capacity building. Enforcement mechanisms, access to justice, and targeted protection are required. Rwanda ratified the ILO Convention on November 1, 2023.

At the regional level, In July 2003, Maputo accepted the Protocol to the African Charter on Human and People's Rights (ACHPR) on the Rights of African Women. The AU's approval of the Protocol is a great step forward in addressing discrimination and violence against women, as well as in efforts to promote and assure respect for African women's rights. The Protocol mandates African states to abolish all types of discrimination and violence against women in Africa, as well as to promote gender equality. Rwanda ratified the Protocol on the 25th of June 25, 2004.

In addition to binding legal instruments, the UN Guiding Principles on Business and Human Rights (UNGP) emphasise the obligations of states to respect human rights, the specialised role of business enterprises, and the need for effective remedies when rights are breached, applicable to all states and business enterprises.

3.2. Legal obligations



Rwanda has enacted legislation which requires employers to respect workers' rights to equality and non-discrimination, and to protect workers' safety and health in the workplace. In addition, workers are typically compelled by law to comply with health and safety regulations.

National efforts include Law No. 59/2008 of 10 September 2008, which specifically targets the prevention and suppression of gender-based violence (GBV).

In line with Rwanda's legal commitments, law n° 66/2018 of 30/08/2018, which regulates labor in Rwanda, establishes strong protections against sexual harassment and workplace discrimination. Article 8 prohibits sexual harassment in any form against supervisees and protects employees from being dismissed for reporting or testifying about such incidents. Where there is tangible evidence that an employee resigned due to sexual harassment by a supervisor, the resignation is legally considered an unfair dismissal. Article 9 further obligates employers to ensure equal opportunities in the workplace and prohibits discrimination based on ethnicity, clan, sex, race, disability, religion, language, or any other characteristic. It also requires equal pay for work of equal value, free from any form of discrimination.

Complementing this, Article 121 of Rwanda's Organic Law n° 01/2012/OL of 02/05/2012 instituting the penal code stipulates that any person who commits crimes against humanity, as defined under specific provisions of Article 120, is subject to life imprisonment with special provisions. Among these crimes, particular emphasis is placed on acts of rape, sexual slavery, forced prostitution, forced sterilisation, and any other form of sexual violence of comparable gravity, as outlined in item 7° of Article 120.

Institutionally, the Ministry of Gender and Family Promotion (MIGEPROF) plays a central role in coordinating national policies, strategies, and programs related to gender equality, family welfare, and the protection of children's rights. MIGEPROF leads the implementation of the Revised National Gender Policy, whose vision is to position Rwanda as a nation that upholds gender equality and equity as drivers of sustainable national transformation.

The policy's mission is to close gender gaps across all sectors by enhancing the effectiveness of gender mainstreaming, implementing gender-responsive interventions, and promoting gender accountability.

Operationally, several key institutions in Rwanda play critical roles in the prevention of and response to gender-based violence, including sexual exploitation, abuse, and harassment (SEAH).

- Rwanda Investigation Bureau (RIB) is mandated to carry out professional criminal investigations, including those related to gender-based violence.
- National Public Prosecution Authority (NPPA), through its specialised unit in charge of gender-based violence cases, is responsible for prosecuting all forms of gender-based violence, including sexual violence and crimes involving drug use. The unit's vision is to fight against and prosecute all forms of gender-based violence, whether committed against children or adults.
- Isange One Stop Centers, such as the one located at Gisenyi Hospital, aim to provide comprehensive services including psychosocial, medical, Rwanda Investigation Bureau, and legal support to adult and child victims of gender-based violence and child abuse, whether occurring within families or in the broader community.

3.3. Stakeholder expectations

Stakeholders like customers, partners, funders, and communities increasingly expect private sector companies to address SEAH risks, recognising gender equality as a key element of sustainable development, aligned with SDG 5 on eliminating all forms of gender-based violence and SDG 8 on promoting safe and decent work for all. Rwanda is committed to these global goals and has integrated them into national priorities. The National Strategy for Transformation (NST2) promotes gender equality by prioritising equal access to resources and enhancing women's participation in male-dominated sectors to drive inclusive economic growth.

There is also a growing recognition of the need for the private sector to contribute to gender equality and the prevention of SEAH, particularly through the integration of these issues into Environmental, Social, and Governance (ESG) frameworks. The International Finance Corporation (IFC), for example, has provided guidance under its Environmental and Social Performance Standards to support private sector efforts in addressing SEAH and advancing gender equity.

3.4. Business benefits

Studies show that equal opportunities and a safe working environment can lead to substantial benefits for companies, some examples are:

- The IFC and the World Bank estimate that companies can lose up to 9% of their wage bill due to lost productivity, absenteeism, medical, security, and re-recruitment costs caused by gender-based violence (GBV). Supporting staff affected by SEAH can create a safe and respectful workplace, reduce violence-related costs, increase staff engagement, and become employers of choice;
- Investing in women's employment also provides a competitive advantage, with private equity and venture capital funds with gender-balanced senior investment teams generating higher returns;
- Companies with a higher share of women at top levels deliver strong organisational and financial performance, with more women on their boards outperforming rivals;
- Mixed groups of women and men have twice as good innovation conditions.

A workplace that prioritises equal opportunities in recruitment, retention, and promotion must also address and prevent SEAH, as it can lead to mental and physical health issues, decreased productivity, and increased turnover. SEAH can also negatively impact external stakeholders, such as local community members, who may face exclusion particularly when victims are stigmatised, disbelieved, or face retaliation. These risks are heightened in tightly knit or patriarchal societies. Additionally, if companies fail to prevent or address SEAH involving community members, they may face legal consequences, such as lawsuits or regulatory sanctions. Companies that ignore community-level risks linked to SEAH risk losing their social license to operate, potentially causing serious business implications.

CASE STUDY: Part 2 – WHY

Uwitonze's Story: A Silent Struggle in the Workplace

Uwitonze, a 22-year-old graduate from a vocational training center in Rwamagana, was overjoyed to secure her first stable job as a waitress at a growing catering company in Kigali. The company, which provided meals for schools, workshops, and events, employed over 50 young women and held contracts with reputable NGOs and government institutions. Earning RWF 80,000 per month, Uwitonze was determined to build a better future. However, within a few months, her excitement turned into fear and distress. She began receiving inappropriate late-night messages from her supervisor—messages that quickly escalated into suggestive comments and unwanted advances. When she refused to comply, she noticed retaliation in the form of unfavorable shifts and denied overtime. The situation peaked during an assignment in Huye when the supervisor attempted to force his way into her room at the staff accommodation. Though she managed to protect herself physically, the emotional toll was immense.

When Uwitonze confided in a colleague who had faced similar harassment, the two approached the HR manager, only to discover that the company lacked a Sexual Exploitation, Abuse, and Harassment (SEAH) policy, a confidential reporting mechanism, or any internal system to address such complaints. Their case was dismissed as a "misunderstanding," and the supervisor remained in his position. Feeling unsafe and unsupported, Uwitonze resigned without a formal reference, her confidence shattered. The company, which had no safeguarding or protection measures in place, failed not only to protect a vulnerable employee but also to uphold its duty of care. This neglect highlighted serious structural gaps and an organisational culture that enabled abuse and silenced victims.

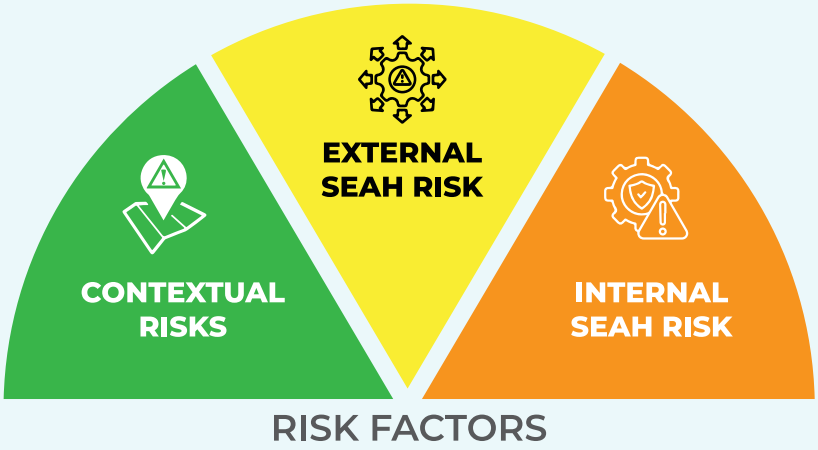
The aftermath of this incident extended far beyond Uwitonze's personal loss. Word of the harassment and the company's inaction quickly spread within the local community, leading to reputational damage and public backlash. Local leaders, parents, and youth organisations began warning young women against seeking employment at the company. Recruitment efforts stalled as potential hires declined offers, and existing female staff began resigning in large numbers. One international client suspended its contract, demanding an internal safeguarding review. The case became a cautionary tale, prompting civil society to call for better worker protection across the private sector. Uwitonze's story serves as a powerful reminder that companies which ignore SEAH risks not only endanger individuals—they also undermine their credibility, sustainability, and community trust.

4. How to prevent and respond to SEAH

SEAH risks can be significantly mitigated by building a company's overall capacity to prevent and respond to SEAH risks. To prevent and respond to Sexual Exploitation, Abuse, and Harassment in employment it is important to identify what risks exist.

SEAH risks can be divided into three different levels:

- the general context;
- the external sphere of the company work (risks which may exist in external relations);
- the internal sphere of work (risks which may exist in internal relations).



4.1. Risk factors

4.1.1. Contextual risks

In Rwanda, significant progress has been made in closing the gender gap, with 80.5% of the overall gap closed to date. The country ranks 6th globally on the Global Gender Gap Index and is a leading African nation in promoting gender equality and women's empowerment.

Women currently hold 61% of parliamentary seats and 55% of cabinet positions, making Rwanda the only country in sub-Saharan Africa to have achieved full parliamentary parity. However, gender-based violence (GBV) remains a persistent challenge. According to the most recent Demographic and Health Survey, 46% of women aged 15–49 have experienced intimate partner violence. More broadly, 45% of women in this age group have experienced physical or sexual violence; 23% physical only, 9% sexual only, and 14% both. Among men aged 15–49, 32% have experienced some form of physical or sexual violence.

In sum, one can conclude that the risk of SEAH is relatively high in Rwanda.

4.1.2. External SEAH risk factors

A company's external risks are shaped by the nature of its operations, which influence interactions with customers and stakeholders, potentially creating or reinforcing power imbalances.

Key risk factors include:

- **The company's staff works out in the field, engage with local communities far away from home or in an isolated setting, where perpetrators potentially have easier access to their targets and there may not be witnesses;**
- **The company's staff or customers/other stakeholders carry characteristics which situates them in a situation of less power, for example, being a female, young, disabled, of an ethnic/indigenous/religious or sexual minority, poor, displaced person/refugee/migrant or asylum seeker;**
- **The company's staff have access to sensitive information about individuals;**
- **The company's staff provides goods and services to individuals in need;**
- **The company provides a service which requires either the company's staff to seek approval from public authorities or clients/other stakeholders to seek approval from the company's staff, which can open a situation where sextortion can occur.**

4.1.3. Internal SEAH risk factors

- Gender imbalances in senior management. A male-dominated leadership structure (e.g. less than 30% women and more than 70%) may increase SEAH risks. Managers who are part of the gender minority may feel isolated and could be, or appear to be, more vulnerable to pressure from the majority group.
- Gender imbalances in the workforce. A workforce with less than 40% women and more than 60% men can create a similar risk. Employees in the gender minority may feel isolated and may be more vulnerable to inappropriate pressure from the majority.
- A historic and current lack of diversity in the workplace includes, for instance, a lack of employees of different sex, age, sexual orientation, gender identity, ethnicity, socio-economic status, educational background, and similar characteristics.

This can affect where women and men of different ages and ethnicities work within an organisation. It may also

involve a lack of diversity across different organisational levels, such as top management, management, middle management, administrative staff, and workers, as well as in the types of positions people hold. For example, women belonging to the majority ethnicity may work as HR managers, in communications, or in administrative roles, while women belonging to minorities may be employed as cleaners. "Majority men" are CEOs or CFOs, while "minority men" are blue-collar workers and drivers.

This situation represents a risk because employees who belong to minority groups may feel isolated and may actually be, or at least appear to be, vulnerable to pressure from others.

- A predominantly young workforce. This is a situation of risk because:
- Employees in their first or second jobs may be less aware of laws and workplace norms and regulations;

- Young employees may lack the self-confidence to report or challenge unwanted conduct, such as SEAH cases;
- They may also be more susceptible to being taken advantage of by co-workers or superiors, particularly those who may be older and more established in their positions.
- Isolated workplaces such as small groups isolated from the headquarters office for instance. This could result in increased risk because:
- Workplaces isolated from the headquarters office can develop sub-cultures of unwanted behavior;
- Managers may feel (or may actually be) unaccountable for their own or their staff behavior and may act outside the bounds of workplace rules;
- Managers may also be unaware of how to address harassment issues and may be reluctant to call headquarters for direction.
- An organisational culture which normalizes sexualized banter. Opinions of employees and managers on what kind of jokes are ok and not.
- An organisational culture which tolerates/encourages alcohol consumption. Obvious examples are places where alcohol is served such as bars, restaurants serving alcohol, events and similar. However, alcohol-encouraging cultures can also exist in other sectors and lines of business. This may be less obvious to detect.

Internal risk traits identified in Rwanda's private sector

Without deliberate and structured action, companies risk perpetuating inequality, normalising harassment, and exposing staff to exploitation and abuse. The lack of effective policies and safeguards further undermines business credibility, reduces competitiveness, and can lead to reputational or legal consequences. Internal risks were evidenced in Rwanda, where a Gender Equality and Social Inclusion (GESI) assessment of six companies, undertaken by Kvinna till Kvinna, revealed the following systemic weaknesses:

- Significant gender pay inequities, with women often earning far less than men in comparable roles, compounded by the absence of pay audits or transparent remuneration frameworks;

- Underrepresentation of women in leadership and decision-making, with many boards and senior positions remaining male-dominated;
- Absence of codified workplace policies, including those addressing sexual harassment, promotions, work-life balance, and inclusive communication.
- Weak or non-existent sexual harassment systems, with many companies lacking confidential reporting channels, victim support mechanisms, or formal links to state services such as RIB or Isange One Stop Centers;
- Limited welfare provisions, such as breastfeeding rooms, childcare facilities, separate sanitation facilities, and disability-friendly infrastructure.
- Occupational segregation, where women are concentrated in lower-paid, caregiving, or support roles, while men dominate leadership, security, or technical positions;
- Low staff awareness of gender equality and safeguarding, reflecting the absence of training or regular sensitisation;
- Corporate Social Responsibility (CSR) and partnership initiatives that are not systematically aligned with gender equality or safeguarding objectives.

4.2. Maturity for the prevention of and response to SEAH

The most important mitigation measure is to build the companies capacity to prevent and respond to SEAH.

One way of understanding company maturity to manage and respond to SEAH is the use of the Maturity Index which can help companies to assess and strengthen their systems in key areas such as policy, resources, and communication ensuring that awareness of SEAH risks leads to meaningful action.

Key areas for SEAH risk management include:

- **Commitment:** A clear mandate for the company to work with SEAH prevention and response is essential. This includes a SEAH policy and action plans.
- **System:** A system should be in place to support SEAH prevention and response, including risk analysis instructions, Key Performance Indicators (KPIs), monitoring systems, grievance and referral mechanisms.
- **Knowledge:** Staff and managers need to have a dialogue about SEAH, its importance, and its link to gender equality.
- **Resources:** Company resources should be allocated to prevent and respond to SEAH, including staff and external experts.
- **Communication:** SEAH should be systematically raised during internal meetings, in oral and written communication, and visible throughout the organisation.

Please find the maturity index annexed to this Handbook.

4.2.1. SEAH Response Systems

To effectively prevent and respond to Sexual Exploitation, Abuse, and Harassment (SEAH), companies must embed clear and victim-sensitive systems within their operations. In Rwanda, where national gender equality efforts are strong, but GBV remains prevalent, the following concepts are especially relevant and critical to local implementation:

- Grievance mechanism: A grievance mechanism is a transparent, clear procedure for addressing grievances, encompassing both internal and external SEAH procedures, adapted to local context and legislation, including data protection laws, making no one-size-fits-all solution.
- Referral mechanism: A referral mechanism is a structured process to link victims of SEAH to external support services, such as healthcare, legal aid,

psychosocial support, and protection. In Rwanda, this can involve:

- Partnerships with Isange One Stop Centers, which exist in all district hospitals and provide free, confidential care;
- Coordination with the Rwanda Investigation Bureau (RIB) for legal follow-up in cases of sexual violence;
- Clear, documented procedures that frontline staff understand and can act on, including referral forms and contact points.
- Victim-centered Approach: A victim-centered approach prioritises the rights, safety, dignity, and choices of the person affected by SEAH. It ensures that victims are listened to, believed, and supported without judgment or coercion.

As per the law 66/2018 of 30/08/2018 regulating labor in Rwanda, it is clear that all companies should have the internal rules and regulations, as well as other policies including the prevention and response to SEAH policy, which clearly states how to report on the SEAH with a high level of confidentiality and how a SEAH victims are protected.

4.3. Actions to mitigate SEAH risks

The institutionalization of the company capacity should be accompanied by actions directly relevant for the work being undertaken. This can be ensuring employees, interns, short term contracted staff and managers have signed Code of Conducts, to having visible material in the office explaining what unwanted behavior is, how to report etc.

Annex 2 provides a list of mitigation actions the company can have in place to both prevent and to respond to SEAH. The annex has both actions the company should do, as well as actions which requires individual responsibility.

CASE STUDY: Part 3 – HOW

Case Scenario: SEAH Risks in a New Coffee Processing Plant in Rwanda

A private equity firm recently invested in a coffee processing plant located in Rwanda's Northern Province. The plant employs around 150 workers, many of whom are women recruited from nearby rural communities. These women often have limited formal education and few alternative employment opportunities. Within the first six months of operation, several female employees began reporting uncomfortable experiences involving supervisors and managers. These incidents included inappropriate sexual comments, offers of job promotions in exchange for sexual favors, and an overall hostile work environment. One worker, Uwera, confided in a local NGO that she felt pressured to accept these "favors" to retain her job, while others faced threats of dismissal if they refused. Despite these serious concerns, the company lacked formal policies addressing sexual exploitation, abuse, and harassment (SEAH), and no grievance mechanisms existed. Female workers feared retaliation if they spoke out, and the local community expressed growing concern over the negative social impact.

Recognizing the risks of sexual exploitation, abuse, and harassment (SEAH), the company decided to implement a comprehensive set of measures to prevent and address SEAH in the workplace. The company developed and clearly communicated a robust SEAH and gender equality policy, translated into local languages and made accessible to all employees. This policy emphasized zero tolerance toward any form of harassment or abuse and outlined clear expectations for workplace behavior.

Confidential grievance mechanisms were established, including a dedicated hotline, suggestion boxes, and trusted focal points trained to handle complaints sensitively and confidentially. Workers felt safe to report concerns without fear of retaliation, which helped build trust between employees and management.
All staff, from supervisors to general

workers, participated in regular, context-specific training sessions on SEAH awareness and prevention. These trainings covered employees' rights, company policies, reporting procedures, and consequences for perpetrators. Supervisors were also screened carefully before recruitment to ensure they adhered to ethical standards and respect for gender equality.

Human resource practices were strengthened by promoting gender-balanced hiring and leadership, along with clear codes of conduct that every employee signed upon joining. This reinforced a culture of respect and accountability throughout the organisation.

Beyond the workplace, the company actively engaged the local community through awareness campaigns and partnerships with local leaders, NGOs, and labor offices. This engagement helped address community-level SEAH risks and fostered stronger social cohesion and support for victims.

The company integrated these SEAH mitigation efforts into the Environmental and Social Action Plan (ESAP) tied to the investment agreement. They regularly monitored the company's progress and compliance with these commitments.

As a result, the coffee processing plant cultivated a safe, inclusive, and respectful work environment. Female employees reported increased confidence and job satisfaction, absenteeism and turnover decreased, and overall productivity improved. The company's positive reputation among local communities was strengthened, securing its social license to operate and meeting key Environmental, Social, and Governance (ESG) standards.

Annex 1. Maturity index on prevention of and response to SEAH.

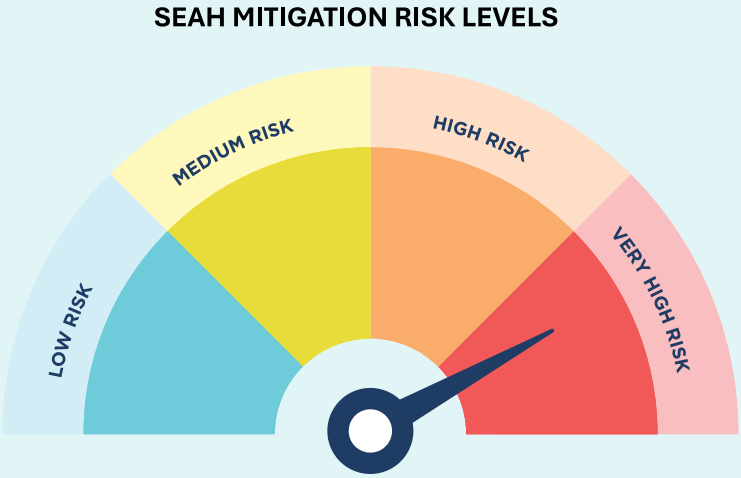
The Maturity Index for the Prevention and Response to SEAH can be utilised by private sector companies to set a baseline for improvement. It can also serve as a basis for developing action plans to enhance capacity in SEAH prevention and response.

*The scores 1-4 on maturity presented in the table below can be made use of in the overall risk assessment. The higher the number, the higher the risk.

	Low capacity (Score 4 for risk assessment*) (Low capacity to identify SEAH risks)	Improvements towards good capacity (Score 3 for risk assessment*) (Can identify SEAH risks)	Good capacity (Score 2 for risk assessment*) (Can identify and have some measures in place to respond to SEAH risks)	Excellent capacity (Score 1 for risk assessment*) (Can identify, and respond to SEAH risks)
Commitment	• No mandate to work with SEAH prevention and response within gender equality and equal opportunities. • Lack of a gender equality or equal opportunity policy addressing SEAH or a SEAH stand-alone policy. • Lack of strategies to implement policy addressing SEAH.	• Unofficial mandate to work with SEAH prevention and response within gender equality and equal opportunities. • Policy addressing SEAH, as a stand-alone or alongside gender equality and equal opportunity, under development.	• Mandate to work with SEAH prevention and response within gender equality and equal opportunities is clear. • Policy addressing SEAH, as a stand-alone or alongside gender equality and equal opportunity, in place. • Strategy addressing prevention and response to SEAH in place.	• Mandate to work with SEAH prevention and response within gender equality and equal opportunities is clear and widely communicated. • SEAH policy in place alongside, or clearly integrated in, gender equality and equal opportunity policy. • Strategies to implement policies funded and active.
Systems in place	• No SEAH analysis takes place. • Lack of gender equality, equal opportunities and/or SEAH-specific KPIs. • Lack of a monitoring system that can capture SEAH. • Lack of grievance mechanism (internal and external). • Lack of referral mechanisms.	• SEAH analysis carried out as a result of individual staff interest. • Some gender equality, equal opportunities and/or SEAH-specific KPIs in place. • Monitoring system (which goes beyond self-reporting) is under development. • Grievance mechanism (internal and external) under development. • Referral mechanism under development/ being identified.	• Instructions for SEAH analysis in place. • SEAH-specific KPIs in place. • Monitoring system (that goes beyond self-reporting) in place/integrated e.g. into E&S Management System. • Grievance mechanism (internal and external) in place and communicated. • Referral mechanisms in place/ identified, for staff as well as for local community members (as needed).	• SEAH analysis incorporated into the investment process and made use of by staff on all investments. • SEAH-specific KPIs in place, updated regularly and used to evaluate progress. • Monitoring system that can capture SEAH in place/integrated e.g. into E&S Management System and used on all investments. • Grievance mechanism (internal and external) in place and communicated. • Referral mechanisms in place/identified for staff as well as for local community members (as needed).

Knowledge	• There is a lack of knowledge among staff and managers about: • What SEAH is, • Why it is important to work with SEAH prevention and response. • How to prevent and respond to SEAH. • No awareness raising sessions on SEAH carried out.	• Awareness raising sessions on SEAH are carried out. • There is knowledge among staff and managers about: • Basic knowledge about what SEAH is. • Basic knowledge about prevention and response to SEAH's relevance for work is under development. • Basic knowledge on how to prevent and respond to SEAH is under development.	• Training sessions on SEAH are carried out. • There is knowledge among staff and managers about: • Basic knowledge about what SEAH is and how it links to gender equality and equal opportunity. • Basic knowledge about prevention and response to SEAH's relevance for work in place. • Basic knowledge on how to prevent and respond to SEAH in place.	• Training sessions on SEAH are regularly carried out. • There is knowledge among staff and managers, and they report feeling comfortable having dialogues around: • What SEAH is, how it links to gender equality and equal opportunities. • Why it is important to work with SEAH prevention and response. • How to develop the work of preventing and responding to SEAH.
Resources	• No resource allocation to work to prevent/respond to SEAH. • No staff or external expert support on SEAH prevention and response is available. • No referral mechanism in place. • No SEAH prevention and response tools in place.	• Ad hoc resources/funds are allocated to the prevention of and response to SEAH. • Ad hoc resources/time is allocated for SEAH prevention and response work amongst dedicated staff. • External resources are being identified, including women's rights organisations with expert knowledge (for support) and as a potential partner in a referral mechanism (for victims of SEAH). • SEAH prevention and response tools for staff and managers under development.	• Resources are allocated for the prevention of and response to SEAH in proportion to the risk assessment carried out. • Resources/time is allocated for SEAH prevention and response work amongst dedicated staff and for trainings for all staff/managers. • External resources are identified, including women's rights organisations with expert knowledge (for support) and as a potential partner in a referral mechanism (for victims of SEAH). • SEAH prevention and response tools for staff and managers available.	• Resources are allocated for the prevention of and response to SEAH in proportion to the risk assessment carried out. • Staff or external expert support is available for questions and support and their knowledge is being requested. • External SEAH resources (experts, organisations) are identified and partner agreements in place, including women's rights organisations with expert knowledge (for support) and as a potential partner in a referral mechanism (for victims of SEAH). • SEAH prevention and response tools for staff and managers in place and made use of and are regularly updated.
Communication	• Lack of internal oral, written and/or visual communication on SEAH. • Lack of communication with external stakeholders around SEAH. • Lack of communication with a vision to increase learning around SEAH.	• Internal meetings with staff/managers include SEAH prevention and response on an ad hoc basis. • Written communication on SEAH is under development (to be considered in line with communication in general). • Preventive SEAH messages under development internally as well as externally where the organisation operates.	• Internal meetings with staff/managers include SEAH prevention and response. • Written communication on SEAH in place (to be considered in line with communication in general). • Preventive SEAH messages are visible internally (such as posters) as well as externally where the organisation operates (as relevant).	• Internal regular meetings with staff/managers on SEAH prevention and response with a learning objective (how to improve work), taking in expert knowledge and/or evidence- based publications. • SEAH is raised in written and oral communication. • Preventive SEAH messages are visible internally as well as externally where the organisation operates, are updated regularly (as relevant).

Annex 2. Examples of SEAH mitigation actions



The annex with 'SEAH mitigation actions' provides examples of appropriate mitigation actions for different risk level, ranging from low to very high. The list is cumulative, meaning that higher risks require more mitigation actions. The actions are arranged according to risk levels and are tied to risk assessment and maturity index. By focusing on the organisational capacity of the company or organisation, risks can be significantly reduced. These measures are inspirational and built on best practices but must be aligned with the company's context and management processes, including those of private sector companies.

Examples of Low-risk mitigation measures (A-D)

A. Have gender equality, equal opportunity and non-discrimination policy or the same expressed in other documented policies and procedures, which is clearly communicated

Organisational level: DDevelop a gender equality, equal opportunity and non-discrimination policy or integrate into other policies and procedures. The policy(ies) must state how the organisation will ensure that downstream partners (sub-contracted entities or individuals) will comply. Preferably policy(ies) are developed with management and parts of staff, representing the diversity of the

organisation including female staff in different positions across teams and levels. A broad consultation should be part of the policy development process to ensure possible gaps/risks are addressed as well as increasing ownership, use and awareness of issue.

- A gender equality, equal opportunity and non-discrimination policy developed or incorporated into other documented policies and procedures (e.g. human resources guidelines, code of conduct) that explicitly include equal opportunities in recruitment, retention and promotion procedures and practices.
- Dedicated gender equality, equal opportunity and non-discrimination resources (budget and personnel). Staff aware of the organisation's gender equality, equal opportunity and non-discrimination policy (e.g. through internal communication and training).
- Plan for ensuring that supply chain/partners meet minimum standard on gender equality, equal opportunity and non-discrimination and comply with partners' policy(ies).
- Procedures are in place to receive partners' written agreement that they are aware of and abide by the policy statements.
- A dedicated focal point with responsibility for gender equality, equal opportunity and non-discrimination implementation and documents (preferably head of Human Resources).
- Provide basic gender equality, equal opportunity and non-discrimination training to staff and managers.
- Develop policy with a broad set of staff and managers (stakeholder engagement).
- Individual level: Read and sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of the gender equality, equal opportunity and non-discrimination policy.
- Read and sign a Code of Conduct that is compliant with the requirements of the Policy (contractual requirement).
- Complete gender equality, equal opportunity and non-discrimination training.

B. Have a Prevention and response SEAH policy or the same expressed in other documented policies and procedures, which are clearly communicated.

Organisational level: Develop a SEAH Policy or integrate into

other policies and procedures. The policy(ies) must state how the organisation will ensure that downstream partners (sub-contracted entities or individuals) will comply. Preferably policy(ies) are developed with management and parts of staff, including female staff in different positions across the organisation.

- A SEAH Policy developed or incorporated into other documented policies and procedures (e.g. human resources guidelines, code of conduct) that explicitly include SEAH and meet the expectations of this policy, including ensuring support for victims and whistle-blowers, guaranteeing anonymity, to protect against retaliation.
- Dedicated SEAH resources (human, money, time).
- Staff are aware of the organisation's SEAH Policy (e.g. through internal communication and training).
- Plan for ensuring that supply chain/ partners (equity, loan or fund), meet minimum standard and comply with Swedfund/ partners policy(ies).
- Procedures are in place to receive partners' written agreement that they are aware of and abide by the policy statements.
- A dedicated focal point with responsibility for gender equality, equal opportunity and non-discrimination and SEAH implementation and documents
- Provide basic SEAH training to staff and managers.
- Develop policy with a broad set of staff and managers.
- Identify quality support services to which GBV/SEAH victims can be referred (financial, psychological, medical, legal).

Individual level: Read and sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of the SEAH Policy.

- Read and sign a Code of Conduct that is compliant with the requirements of the SEAH Policy.
- Complete SEAH training.

C. SEAH reporting and investigation process in place.

Organisational level: The SEAH Policy, or equivalent, documents how SEAH incidents will be managed, reported and investigated in a victim-centered approach. Reporting and investigation processes must include engagement of and reporting to senior management and executive boards. Preferably female staff in different types of positions are consulted about the design of the reporting and

investigation measurements. Should include aspects such as leave for victims, flexible work arrangement, temporary protection against dismissal (ILO C190).

- Have documented victim-centered processes in place to report and investigate concerns or allegations of SEAH, and policy non-compliance.
- Have a process in place to ensure staff are aware of the reporting procedures/processes (on-boarding).
- Ensure reporting processes are publicly available and that downstream partners and community members are aware of and can access these.
- Have documented evidence outlining incident management of SEAH concerns or allegations.
- Reporting and investigating processes for SEAH include engagement with and reporting to senior management and executive boards on at least an annual basis.
- Have documented evidence outlining the organisation's provisions for managing policy non-compliance.
- Investigations are undertaken by experienced and qualified professionals who are trained in sensitive investigations and on a victim-centered approach, which includes respecting confidentiality.
- Policy documents with reference to SEAH are subject to regular review.
- Individual level: Confirm awareness of SEAH reporting requirements or incidents of non-compliance with the Policy.
- Read and sign a Code of Conduct outlining the reporting and investigation processes.
- Aware of the reporting procedure and their responsibilities in regard to SEAH Policy.
- Contractual agreements include clauses regarding reporting on and implications of policy non-compliance.

D. Prevention of and response to sextortion in place (see definition in Handbook)

Organisational level: Sextortion prevention, detection and reporting mechanism in place. Sextortion is treated as a separate risk but included in both SEAH as well as anti-corruption policy and measures.

- Procedures in place (SEAH and anti-corruption) which incorporate the aspect of sextortion.
- Basic training on the nature of sextortion and how it relates to SEAH as well as corruption.
- Focal points for SEAH and/or corruption include sextortion as part of this work.

Individual level: Read and sign a document outlining appropriate and enforceable standards of conduct, compliant with the requirements of the SEAH Policy, in which also sextortion is defined.

- Code of Conduct refers to SEAH Policy, and anti-corruption policy (which includes sextortion).

Examples of Medium risk mitigation measures (A-D + E-F)

E. Have risk management processes that include the risk of SEAH.

Organisational level: Have effective SEAH risk management processes. The process must document the mitigation measures in place or to be implemented to reduce or remove risks.

- Undertake a risk assessment, prior to entering into an agreement, that explicitly takes the risk of SEAH into account.
- The risk of SEAH is included in broader risk management plans, which also identify mitigation measures to reduce or remove these risks.
- Documented evidence that senior management and executive boards have visibility of the management of the risk of SEAH.
- Documented evidence of the organisation's expectations for downstream partners and how those downstream partners will manage SEAH risk.
- Documented evidence risk plans/assessments are active and reviewed/updated as required.
- Individual level: Fulfil reporting requirements in alignment

with a SEAH Policy.
- An individual is not required to have a risk management system in place however they are required to understand and actively manage risk including the risk of SEAH.
- Individuals are required to identify, manage and be vigilant about reporting risks, including the risk of SEAH arising during their work.

F. In depth gender equality, equal opportunity and non-discrimination and SEAH training in place.

Organisational level: Gender equality, equal opportunity and non-discrimination and SEAH training for staff/managers, including downstream partners and individuals.

- Provide gender equality, equal opportunity and non-discrimination and SEAH training that raises awareness, which builds workplace cultures of respect and accountability, and support prevention efforts.
- All staff and managers attend mandatory gender, equal opportunity and SEAH training including all new staff.
- All staff undertake regular gender and SEAH refresher training at least every 3 years.
- Internal communications detailing the expectations regarding awareness raising efforts of gender equality, equal opportunity and non-discrimination and SEAH are both internally and externally focused.

Individual level: Complete gender equality, equal opportunity and non-discrimination and SEAH training and provide evidence of this.

- Undertake SEAH training.

Examples of High-risk mitigation measures (A-D + E-F + G)

G. Recruitment and screening processes and employment practices address and manage the risk of SEAH.

Organisational level: Can demonstrate recruitment and screening processes for all staff, managers and consultants, which includes an appropriate and enforceable standard of conduct.

- Documented criminal records checks for all staff for all countries/ies of residence or citizenship within the previous five years and updated regularly.
- Documented verbal reference checks (at least two) for staff working in high-risk environments or with people in vulnerable situations (see sheet for examples 3).
- A documented request for an applicant to disclose whether or not they have ever been charged with any SEAH related offences.
- Employment contracts contain provisions for the suspension or transfer of staff to other duties while under investigation and have provisions to dismiss staff if allegations are substantiated.
- Supervision and performance appraisals include adherence to the SEAH Policy or related documents.
- Individual level: Assurances could include recent police check and that local labor legislation must also be followed.
- Individuals are required to provide a current criminal record check (or local equivalent), as well as references during recruitment.
- Through a Code of Conduct, are required to disclose whether or not they have ever been charged with any SEAH related offences.
- Individuals are required to inform about any changes to their circumstances in regard to SEAH related offences, during the term of their engagement.

Examples of Very high-risk mitigation measures (A-D + E-F + G + H-I)

I. Strongly discourage intimate relationship with people in vulnerable situations which involves sex, including with persons in prostitution. Buying sexual services does not just include "cash purchases" of sexual services from persons in prostitution, visits to brothels and similar, but also "private support" in the form of payment of bills, rent and school fees in exchange for sexual services which could lead to sextortion.

Organisational level: Strongly discourage intimate relationship involving sex in the field for all staff and downstream partners.

- Documented policies and procedures specific to this requirement (e.g. contracts, agreements).
- Documented procedures for ensuring compliance of downstream partners with this minimum standard.

Individual level: Employment agreements might need to include clauses strongly discouraging intimate relationship involving sex while at work or in conjunction with work (travelling, after work with colleagues or clients)

- Agreements might need to include clauses for staff away from 'home' and in conjunction to work (meeting with colleagues, clients etc.)
- Code of Conduct.

H. Strongly discourage outside work sphere engagement (with local communities, between staff and managers).

Strongly discourage intimate relationship with people in vulnerable situations which involves sex, including with persons in prostitution. Buying sexual services does not just include "cash purchases" of sexual services from persons in prostitution, visits to brothels and similar, but also "private support" in the form of payment of bills, rent and school fees in exchange for sexual services.

Organisational level: Discourage fraternisation for all non-national personnel in the field.

- Employment agreements might need to include clauses discouraging/prohibiting fraternisations for all non-national personnel in very high-risk settings.
- Documented procedures for ensuring compliance of downstream partners with this minimum standard.

Individual level: Employment agreements might need to include clauses encouraging against fraternisation for all non-national individuals.

- Clauses might need to be included in employment agreements for non-national individuals.

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