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Developing a Workplace Sexual Harassment Policy:

Lessons from Engendering Industries' partner, [Eko Electricity Distribution Company](#), in Nigeria.

THE ROLE OF WORKPLACE POLICIES IN PREVENTING AND ADDRESSING SEXUAL HARASSMENT

Eighty-five percent of women globally have experienced sexual harassment in the workplace,¹ which has traumatic consequences for survivors and reputational, financial, and legal costs for companies. A study from Nigeria showed that workplace sexual harassment is common, with over 60 percent of respondents reporting that they had experienced sexual harassment.² Despite this, few organizations in Nigeria have formal sexual harassment policies.³

When the Eko Electricity Distribution Company (EKEDC), a leading power distribution company in Nigeria, joined the United States Agency for International Development's Engendering Industries Program in 2015, the organization did not have a sexual harassment policy. With the support of the Engendering Industries team, EKEDC developed a sexual harassment policy with several survivor-centered elements. This achievement represents progress in Nigeria, where few companies have workplace sexual harassment policies. These efforts were part of a broader approach to increase gender equality across EKEDC, including comprehensive

¹ Daley, Lauren P., Travis, Dnika J., Shaffer, Emily S. (2018). *Sexual Harassment in the Workplace: How Companies Can Prepare, Prevent, Respond, and Transform Their Culture*. Catalyst. ([Link](#))

² Stand to End Rape Initiative. (2021). *Research Brief: Examining the Prevalence, Context, and Impact of Workplace Sexual Harassment in Nigeria*. ([Link](#))

³ Ibid

WHAT IS GBV?

Gender-based violence is an umbrella term for any harmful threat or act directed at an individual or group based on actual or perceived biological sex, gender identity and/or expression, sexual orientation, and/or lack of adherence to varying socially constructed norms around masculinity and femininity. GBV can include physical, emotional, and socio-economic violence as well as sexual and verbal assault that is more commonly associated with sexual harassment.

Survivor-Centered Approach to Gender Based Violence (GBV), including Sexual Harassment

A survivor-centered approach is one in which the survivor's best interest, dignity, experiences, and needs are at the center of GBV (including sexual harassment) prevention and response.⁴ Survivor-centered approaches should be used in developing workplace GBV policies, during formal investigations into alleged incidents of GBV, and in ensuring accountability for perpetrators. A survivor-centered approach restores power to the victim, allowing them to decide when and how to respond to GBV.

organizational policy reform, recruitment and succession planning changes, and other human resources (HR) and change management initiatives.

WHAT IS A SURVIVOR-CENTERED APPROACH TO GBV?

A survivor-centered approach is one in which the survivor's best interest, dignity, experience, and needs are at the center of the entire grievance management mechanism and process. Organizations should use survivor-centered approaches to develop sexual harassment and GBV policies and investigate and respond to alleged incidents of workplace GBV. A survivor-centered approach returns power to the victim and facilitates a process in which a victim can become a survivor.⁵ When organizations lack survivor-centered sexual harassment policies and approaches, they compromise their employees' health, safety, and well-being and, thus, their business performance. Sexual harassment negatively impacts corporate reputation, brand, and culture and hampers recruitment, hiring,

and retention efforts. It also can increase operating costs through costly legal settlements and increased costs for the provision of medical care to employees. Conversely, organizations that prioritize survivor-centered approaches see business performance benefits, like improved reputation, reduced turnover, and increased employee satisfaction and retention. For these reasons, organizations should develop and implement survivor-centered policies and practices that prevent and address sexual harassment and other forms of GBV.

DEVELOPING A SURVIVOR-CENTERED SEXUAL HARASSMENT POLICY

Conduct a Situation Analysis

For years there were no official reports of sexual harassment at EKEDC, which was a red flag for management. Data shows⁶ sexual harassment is common in Nigeria, and lack of reporting could indicate distrust in reporting structures instead of a low rate of sexual harassment.

"We'd hear about sexual harassment by word of mouth," said Oyinlola Osinubi, EKEDC's Head of Organizational Development. "But, in official channels, people were silent. We recognized that we didn't have the necessary reporting mechanisms. When someone is deciding whether to report sexual harassment, they begin asking themselves, 'How do I report this? To whom should I report? What will happen to me if I report?' When people don't know the answers to these questions, they shrink away and choose not to talk. Every organization in the world should have a sexual harassment policy."

Use a Participatory Design Process

The utility used a strategic and participatory approach to draft, test, review, and finalize the policy. While the HR department spearheaded

⁴ Adapted from: USAID. (2020). *Protection from Sexual Exploitation and Abuse (PSEA) Frequently Asked Questions*. Washington, D.C.: USAID. ([Link](#))

⁵ Ibid

⁶ Ibid

THE BUSINESS CASE FOR PREVENTING AND RESPONDING TO SEXUAL HARASSMENT

Sexual harassment policies help create a safe workplace for employees and an optimal operating environment for businesses. Without these policies in place, sexual harassment and GBV can negatively impact business performance, including staff productivity and retention, company reputation, and costs of operation. Data from the [International Center for Research on Women](#) found that:

- Sexual harassment reduces productivity. When sexual harassment occurs within a team, companies lose an estimated \$22,500 in productivity per harassed individual.
- GBV increases turnover. Recruitment costs to replace employees who leave a company due to GBV can range from \$5,000 - \$211,000 per employee, depending on the industry and level of the employee
- Sexual harassment creates legal fees. Settling allegations of sexual harassment out of court can cost an average of \$75,000, while litigation costs for cases that go to trial average around \$217,000.

the policy, they engaged employees across the organization to ensure an inclusive design process.

“When you have interventions coming only from HR, people might not feel ownership,” Oyinlola explained. “So, we ensured that members of other departments were nominated to the policy team so they could share what they have learned and get buy-in from others in their departments. We included our legal, auditing, customer service, commercial, and compliance representatives, and technical teams.”

Engendering Industries provided examples of survivor-centered sexual harassment policies and conducted trainings that helped them to frame and draft the policy. The process allowed EKEDC to clarify common misconceptions about sexual harassment, such as what types of actions are considered sexual harassment or who might experience it within the organization.

“We had assumed that harassment was just male-on-female, but we learned that it could go both ways. So, we incorporated that in the policy,” Ms. Osinubi recalled.

When the policy was ready for review, the utility used focus groups and presentations to socialize and solicit employee feedback from across the organization, including men and women, at all levels.

“During the review process, we found that employees were most concerned about confidentiality in the reporting channels,” said Ms. Osinubi. “Other issues came up as well. For example, there was debate about whether to identify the individuals who would be receiving and managing the reports. Ultimately, we decided yes, our employees have the right to know who receives their complaints. This is a critical part of building trust in the system.”

With employee feedback incorporated, the HR department presented the policy to the leadership team and management.



Oyinlola Osinubi, EKEDC's Head of Organizational Development

Use of Terminology – Victim vs. Survivor

“Victim” describes someone who has experienced sexual harassment or other forms of GBV and has not yet regained power or entered the recovery and healing process. The term “survivor” describes someone who has experienced harm but has entered or completed either a personal or facilitated process to regain their power and heal.

Finally, with the support of senior leadership, HR sent the policy to the CEO for approval.

Iterate the Sexual Harassment Policy

EKEDC’s first sexual harassment policy included sound approaches, like voluntary reporting and access to multiple anonymous reporting channels (including a web form, an ethics committee phone number, and an ethics committee email address). The policy also empowered victims of sexual harassment with decision-making control, including whether to initiate an internal investigation via formal or informal procedures.

But over time, EKEDC found opportunities to strengthen its sexual harassment policy by including more survivor-centered approaches that better support victims, such as providing access to internal counselors and external counseling services by the Institute of Counseling of Nigeria. Victims can also be temporarily moved to a safer workspace while the case is being investigated. The organization also rolled out sexual harassment trainings for mid- and senior-level managers to ensure that supervisors and staff understand the importance of prioritizing the needs of the victim by referring them to a counselor as the first course of action.

“In our approach, the survivor understands their options, and nothing is imposed on them,” explained Wola Joseph, the Head of Legal at EKEDC. “Our goal is for the survivor to feel safe at work going forward. They have already had a traumatic experience. So, we are cautious. When sexual harassment is reported, we ask the complainant whether they are comfortable with escalating. The survivor drives the process and determines the steps we take and can choose at any time to stop an investigation once it has started. Sometimes, the survivor wants to take time off work, which is allowed.”

In addition to the Sexual Harassment Policy, Engendering Industries supports EKEDC’s goal of building a gender-equitable and safe workplace by improving adjacent policies and practices that impact workplace culture. For example, it is common practice in Nigeria for organizations to enact workforce dress code policies. However, dress code policies can be harmful if they unfairly target women or are used to prevent sexual harassment, as this can place blame on the victim rather than the perpetrator. Engendering Industries has supported EKEDC to ensure its Dress Code Policy is gender equitable, does not disproportionately target women, and is not used as a means to prevent sexual harassment. To help achieve this, EKEDC renamed the policy Professional Attire and Grooming Policy, reflecting the policy’s main purpose. Additionally, Engendering Industries is supporting the organization to draft and roll out a larger gender-



Wola Joseph, Head of Legal at EKEDC

based violence policy, using survivor-centered approaches to address GBV.

Create a Rollout Strategy

With approval from the CEO, EKEDC's HR department shared the sexual harassment policy with employees via email and made it publicly available on the company's intranet site. They soon realized, however, that they needed to do more.

"Creating and sending a policy by email is one thing," said Ms. Alero Olayiwola, Head of Learning and Development at EKEDC. "Getting people to read, understand, internalize, and care about it is another. Unfortunately, not many people took the time to read it. Many knew they had received it but didn't know what it was about or why it mattered."

Engendering Industries supported EKEDC to create a sexual harassment training for all staff that included an overview of the behaviors that constitute sexual harassment, services available to victims, reporting procedures, and consequences for perpetrators, including possible termination. Then, using a training of trainers approach, Engendering Industries supported EKEDC in rolling out the policy to the utility's 2,000 employees.

Department managers nominated employees who met the criteria of effective facilitators, such as those with excellent communication skills. The HR department, with the support of an external consultant, trained these employees to facilitate sexual harassment trainings across the organization. With support from the Engendering Industries coach, EKEDC created a list of anticipated questions from training participants and developed answers to ensure all trainers had the correct knowledge, capacity, and skills to navigate difficult and sensitive discussions. Additionally, EKEDC incorporated sexual harassment training into the onboarding protocol for all new employees.

EKEDC's primary objective was to create an approach that would result in high employee attendance and engagement levels. Therefore, the team developed a logistical approach that considered factors that could increase or reduce employee engagement, ensuring high levels of training participation.

"There were many factors to consider, and we needed to think strategically about how to roll these training sessions out," said Ms. Olayiwola. "We had to consider schedules, locations, and times of the day. We had to generate buy-in from district managers so that they would allow their employees to participate. We described the policy, the training, and the importance of employee participation, reassuring them that we would hold trainings during the first week of the month when the workload was lighter. Finally, we located the trainings in a central location, eliminating concerns about traffic and reducing absenteeism."

Engage Staff in Dialogue about the Policy

EKEDC trainers approached the sessions as an opportunity for two-way dialogue among employees on all aspects of sexual harassment. The HR Department provided examples of behaviors that constitute sexual harassment, and the ensuing conversation revealed gendered differences in how men and women perceived these behaviors. Some behaviors that men thought were innocuous were perceived as



Alero Olayiwola, Head of Learning and Development at EKEDC

harmful by women. For example, women shared that being casually touched by men during workplace conversations, receiving hugs at work, hearing men comment on the appearance of their female colleagues, and being stared at and “looked up and down” by men in the workplace were all behaviors that made them uncomfortable.

In addition to increasing knowledge, the trainings gave male and female employees a chance to express themselves freely, share their personal experiences and concerns related to sexual harassment, and relate to each other. This honest sharing helped break the mindset that sexual harassment is a woman’s issue and improved understanding between male and female staff. The utility found that the benefits of the training extended beyond simple information sharing and had therapeutic value for participants.

“This two-way communication not only allowed us to ensure our employees understood everything, but it also allowed us to understand what particular issues were unfolding at the district level,” said Ms. Osinubi. “It also gave us an opportunity to reassure our staff that our reporting mechanisms were safe, that anonymity would be protected, and that we would follow the wishes and protect the individual filing the complaint.”

Trainers also asked employees how the policy and training sessions could be improved and if anything required further clarification. Finally, the organization used post-surveys to evaluate learning and analyze the effectiveness of the training. This information was used to strengthen future trainings.

Provide Ongoing Training and Evaluate Policy Efficacy

EKEDC has made the policy available on its corporate intranet and has incorporated it as one of the mandatory policies for onboarding every new staff member. The team has also held additional company-wide trainings to keep current employees informed. EKEDC also regularly monitors the impact of the sexual harassment policy and trainings.

IMPACT OF THE POLICY AND TRAININGS

Since improving its sexual harassment policies grievance mechanisms and holding the trainings, EKEDC has seen a slight uptick in reporting, which is an early sign that the changes are working. It shows that employees trust the process and people feel safer coming forward.

“Before the policy implementation and awareness programs, there were no formal complaints [of sexual harassment] where a case was investigated and adjudicated formally. After, I think we’ve had three,” reflected Ms. Osinubi, “We had the first one, and we were like, ‘Ok, that was new and, by following our policy, we handled it well.’ Then we had another two and knew we had a good model to follow.” In total, four cases have been elevated to the complete disciplinary process, which has resulted in one termination, two redeployments, and one resignation.

“The policy has helped greatly,” said Ms. Joseph. “I have seen men behaving better and women feeling safer. The company’s reputation has improved as word spreads that we are a gender-friendly and gender-protecting organization. Between 2015 and now, there has been an increase, almost a doubling, of women working at the company. In my assessment, people perceive us as a gender-friendly company, and the bottom line will reflect that.”

EKEDC also recognizes that every organization still has room to grow in improving reporting rates and creating a safer environment for both female and male employees. The company plans to continue improving the content and implementation of its existing policy, and will expand it to include other

forms of GBV beyond sexual harassment such as domestic violence. EKEDC also plans to find new ways to measure the effectiveness of policy implementation, including the application of workplace climate surveys.

BEST PRACTICES AND SURVIVOR-CENTERED APPROACHES FOR PREVENTING AND RESPONDING TO WORKPLACE SEXUAL HARASSMENT

Engendering Industries works with 100 organizations in nearly 40 countries to advance workplace gender equality, including creating policies and practices that create a safe and productive environment for all employees. Developing survivor-centered policies and practices that prevent and address sexual harassment and other forms of GBV are critical for advancing workforce gender equality, particularly in male-dominated industries. Engendering Industries recommends the following approaches to building workplace sexual harassment and GBV policies:

Key Strategies for Preventing Workplace Sexual Harassment and Other Forms of GBV

- Provide workplace sexual harassment and GBV trainings
- Institutionalize best practices that foster a safe work environment
- Ensure policies and procedures are clearly and regularly communicated
- Hold managers and other leaders accountable for enacting workplace policies

Key Strategies for Responding to Workplace Sexual Harassment and Other Forms of GBV

- Prioritize psychological & emotional support
- Recognize, enable, and protect the victim's inherent right to control the response process
- Use robust grievance mechanisms
- Establish clear disciplinary action for perpetrators
- Establish an independent investigation process
- Strengthen pre-employment checks

To learn more about implementing survivor-centered approaches to workplace sexual harassment and other forms of GBV in Engendering Industries' new guide [here](#). Visit the [Engendering Industries website](#) to learn more about the program's approach to advancing gender equality in workplaces worldwide.

ABOUT ENGENDERING INDUSTRIES

USAID's Engendering Industries program increases economic opportunities for women in traditionally male-dominated sectors. Expanding women's workforce participation in male-dominated industries leads to tangible economic outcomes for women, such as formal employment opportunities and higher income. Increased gender equality in the workforce also improves business performance by increasing employee retention and satisfaction, reducing turnover, driving productivity, and enhancing an organization's resilience to crises and economic shocks. USAID's Engendering Industries program works with 98 organizations across 38 countries to improve gender equality in male-dominated sectors. Engendering Industries uses a comprehensive approach to improving gender equality in male-dominated sectors and supports organizations to implement gender equality initiatives at each phase of the employee lifecycle. In addition, Engendering Industries supports companies in designing and implementing survivor-centered approaches to preventing and responding to workplace sexual harassment and other forms of GBV.