



WORKERS RIGHTS WATCH, with support from Women Working Worldwide

Tackling Sexual Harassment in the Horticulture Industry: End of Project Report

April 2016

10.04.2016

1. Background

In autumn 2013, Workers Rights Watch (WRW) undertook research across 20 horticulture farms, documenting incidence of sexual harassment on the farms and the effectiveness of companies' policies and procedures to prevent and to respond to complaints of SH. The findings were shared with Kenyan growers and certification bodies. As a result, some growers made verbal commitment to work collaboratively to address the issues identified.

WRW was requested to draft a model sexual harassment policy that incorporated WRW's key research findings, legal requirements as established by Kenyan Law(s) and by international conventions. The policy was drafted and validated by workers and Human Resource (HR) managers from over 40 farms.

The pilot initiative builds on the commitment made by seven Growers to implement the Model policy and to assess its effectiveness in reducing sexual harassment.

Between April and November 2015, WRW has:

- 1) Developed training material and provided training on sexual harassment and on the Model policy and procedures to general workers as well as complaint-handling officials, (viz. gender committee members, supervisors and HR managers);
- 2) Provided training and capacity-building support to gender committee members across the farms;
- 3) Conducted baseline and end-line surveys to assess the impact of the project activities in improving prevention and remediation of sexual harassment across the seven farms
- 4) Produced and disseminated Farm-specific research findings reports as well as minutes of training sessions and workers' key recommendations to Management to support the Pilot Farms in their effort to improve of prevention and handling of sexual harassment.

2. Purpose of the End of Project Report

The purpose of this report is to document the following:

- 1- The progress made across the Pilot Farms
- 2- Outstanding challenges/gaps, after completion of project activities;
- 3- Lessons learned from implementation of the project.

3. Methodology

The findings presented in this report draw on the information generated through the following methods and tools:

- i.) Administration of survey questionnaires to general workers, gender committee members, supervisors, managers¹
- ii.) Focus group discussions held with general workers and gender committee members: 2 meetings in September (off-farm), 1 meeting again in November (off farm)²
- iii.) Pre and post training tests
- iv.) End of Project workshops, held end of November and early December with workers, GCMS, managers and certifications (KFC and FTA) respectively, to validate the research findings
- v.) Discussions during on-the-farms refresher training.

4. Limitation of this study

Sample size: A small sample took part in both the survey questionnaire and in the focus group discussions.

Sample selection bias: The employees, who completed the survey questionnaires, had been selected by the Farm (i.e. the Farm selected the employees to take part in WRW's training).

While WRW clarified that all information would be treated confidentially and the respondents' identity would not be disclosed, employees might have felt hesitant to share information that would put the Company under a negative light.

In addition to this, the overwhelming majority of the sample had permanent employment contracts. This may affect the generalizability of the responses, as permanent workers are more likely to have received training and/or be more informed on the Company's workplace policies, including the sexual harassment (SH) policy.

5. Summary of findings:

5.1. To what extent has the Model policy be implemented?

This section outlines the progress observed on the pilot farms in implementing the sexual harassment Policy. Table 1 (annexed) summarises the progress made in each Farm against the Policy's main clauses.

5.1.1 Progress against clause 4: Communication of the Policy

While the baseline survey revealed limited preventative action across over half of the pilot farms (i.e. policies were in place, but these were not communicated to employees), the FGDs reveal that in 5 farms multiple communication channels are now used to make employees aware of the SH policy.

These include:

- ✓ A clause on sexual harassment included in the employment contracts (Farms A and G).
- ✓ In farms A, C, D and F the policy has been included in their training manuals used during induction.
- ✓ Only farm C has scheduled cascade training by trained GCMs: between 30 to 40 minutes *per week*, on what constitute sexual harassment and on the Model policy, within each farm blocks. In farms A and F, all employees have been trained on the policy and though no time has been allocated for refresher trainings by GCMs, farm F allocates time for this during parades and department meetings. Farms D and G allocate training time upon the request of committee members while no action on this reported by farms B and E

¹Survey questionnaires were administered to 219 general workers, 43 gender committee members, 155 supervisors, 43 managers.

²Off-the-farms focus group discussions were held in September and in November with 47 general workers and 30 gender committee members.

- ✓ Using the GC members to take new employees through the Company's sexual harassment policy during new employees' orientation sessions (C, D, F and G).
- ✓ All farms have incorporated the Model policy into their existing and affixed it on the notice boards. Farm F has put up a banner on the gate. Farms C, D and F have affixed the policy on the notice boards in each department.
- ✓ A clause on sexual harassment in the Employee's Handbook/ HR handbook (A, C and G);
- ✓ Although farms F and D do not have an existing Human Resources handbook, they have a clause on SH in their standard operating procedures (SOPs) guidebook. In farm A, a clause on sexual harassment was included in HRM Manual/Rules and Regulations.

Limitations of the action undertaken to date

The FGD and on-the-farm refresher training revealed that while action had been taken to make workers aware of the Companies' Policy and Procedures, limited action has been taken to ensure that **Managing Directors, Heads of Department, HR and non-HR Managers, supervisors** are aware of their responsibilities as spelt out in of the Model Policy (section 5), and are able to fulfil these.

The following had been noted;

- ✓ In only one farm (G), a memo was circulated to all departments informing managers about the consequences for breaching the policy.
- ✓ In none of the farms, the Management has requested/allocated time for managers and supervisors, who were trained by WRW, to cascade training to their colleagues. However, trained managers and supervisors in farms C, D and G participate in addressing the topic on SH to workers and colleagues in their department while those in farm F attend trainings by the GCMs.
- ✓ Workers in farms B, D and G insist that managers/supervisors in their farms need more training on the policy as some have not changed their inappropriate behaviors (especially on the dress code), while others are not aware of their roles in implementation.
- ✓ In most of the farms, (5/7) new managers/supervisors are not taken through induction training on the policy.
- ✓ Only managers/ and supervisors in farms C, F and G have forwarded concerns or filed complaints with the GC, showing knowledge and trust in the committees and the procedures for filing complaints
- ✓ Only the directors in farms C, D, F and G have signed a directive on the policy.

This is crucial considering the key role, which supervisors and HRMs play in receiving and in adjudicating complaints.

Farms committed to take steps necessary to ensure that there is a clear system for ensuring all workers are represented in the GC, workers are well informed on the policy and the management offers adequate support to the committee members. The following was noted;

- ✓ The HRM in only one farm, D, sent out a questionnaire to measure the level of understanding of employees on the policy, noted benefits from the implementation and the changes observed by workers from the way in which the policy is being handled by the management.
- ✓ Farm G has engaged GCMs in a training offered by an external team to build on their skills, and has offered contacts for accessibility of support groups outside the farms. Farm D GCMs have engaged their district hospital in offering guidance and counselling services.

- ✓ Only Farms A and F have translated the policy to their workers on all cascading equipment (incl. the notice board and employee handbook) for greater understanding.
- ✓ Only HRMs in Farms C and F have scheduled regular meeting with the gender committee members to summarize progress and review their work plans.
- ✓ In farm A, the HRM has changed the procedures for employment and contract renewal to prevent events of SH arising from these. They have come up with an evaluation form where employee, supervisor and HRM evaluate/verify an employee's credibility as opposed to initially where only the supervisor did the renewal
- ✓ All farms have re-elected the GCMs and included male representatives in the GC. Farms D and E have established a separate male GC, but workers in farm E are not aware of their male gender representatives while some male GCMs in farm D have not been trained on their roles. Farm G raised the need to have a union member as part of the committee.

5.1.2 Progress against clause 6: Procedure to report and to resolve allegations of SH

At focus group discussions, general workers and the GCMs reported that improvements had been observed in the way in which complaints are now received and dealt with by the GCMs and by HRD. They raised the following points:

Promptness of investigations

- GCMs are now aware of their responsibility to respond to SH complaints and to ensure that the GC Chair institutes investigations. And in 4 out of the 7 farms, they have reportedly acted on this responsibility (i.e. at farm C, D, F and G). GCMs in 5 farms (A, C, D, F and G) have reported to have successfully handled other gender related cases that were not of a SH nature using the procedures laid out on the guidelines for resolving complaints.
- The GCMs, in all farms except farm B, reported that communication and collaboration between the GC and managers has greatly improved. The surveyed GCMs stressed that there is now greater understanding amongst managers of the mandate of the GC and greater respect towards its members.
- According to both the GW and the GCMs, on four out of the 7 pilot farms (i.e. at G,C,F and D), the GC Chair has been prompt at requesting permission from HRM to investigate reported complaints and HRM has been prompt at giving authorisation. The GCs are given time to investigate the complaints/meet with the parties involved and when required, HRD on these farms have provided support to the GC.
- The process whereby complaints are investigated has become more transparent/accountable. For instance on most farms, complainants and witnesses are now asked by the GCMs to read and to sign their statements; before being trained by WRW, complainants were not able to verify the accuracy of the information gathered by the complaint-handling officials.
- Greater awareness of the different behaviour that constitute SH has allowed the GCMs to now accept and investigate complaints that involve hostile environment forms of SH – such as sexually explicit text messages (text messages accepted as evidence).
- Communication between the GC and the general workers has also improved: the surveyed general workers stated that complainants and observers/witnesses seem content with the way the GC is handling arising matters and that their trust in the committee has been “fully won”.

Impartiality of investigations of complaints

- On most farms, workers report that cases involving managers and supervisors as the offenders have been investigated with impartiality.
- Inaction on reported incidents of SH– especially those involving managers and supervisors as the alleged offenders- which emerged as a critical issue in the baseline survey in over half of the pilot farms, has reportedly decreased.

Limitations

According to the workers and the GCMs, gaps are still observed in the way complaints are handled across two Farms (B and E). On farm B, the workers and the GCMs who took part in the FGDs raised that impartiality is not always observed when supervisors and managers are implicated in a case. The GCMs explained that the Committee Chair and HRD interfere with the investigation process, when certain managers and/or supervisors are implicated. The Chair has reportedly approached witnesses and put pressure on them to either decline to cooperate with the investigations or to provide a statement in support of the accused.

On farm E, the GCMs explained that the Human Resource Managers are still taking up the role of the gender in handling complaints. Workers hesitate to file complaints involving managers and supervisors to HR managers, for fear of victimisation.

While most farms report decrease in SH complaints and consistency in other Gender based complaints to the GCMs,

On farm A, the GCMs are not confident enough in handling their responsibilities, besides the adequate support offered to them by the HRM. This is mainly due to the fact that some complaints filed prior to the Farm's involvement in the Pilot Initiative had been ineffectively handled by the management, which has caused some reluctance from the workers in filing complaints and the GC in handling these especially when managers and supervisors are involved, for fear of retaliation.

Workers and the GCMs on all farms raised that the burden of proof is often a great challenge. They shared a number of incidents that were observed and reported to the GCMs, but no action could be taken because of lack of evidence.

Limited knowledge among committee members in handling reported complaints. HRMs in farms A, D and G explained that most cases reported to the GC after the pilot extended from SH to domestic conflict, which altered the procedures used in handling the complaints, as the GCMs weren't skilled enough to handle such cases.

5.1.3 Progress against clause 10: Confidentiality

According to both the general workers and the GCMs, observance of confidentiality, which emerged as an issue in the baseline survey, has greatly improved. GCMs are now aware of the importance not to share information about a complaint with any other parties than those involved in a case.

However, challenges were still reported across 2 farms (F and B), by both the GCMs and the general workers. Here, individual GCMs were said to breach confidentiality and/or spread malicious rumours for personal reasons. GCMs raised that their behaviour may affect the credibility of the GC *as a whole* vis-à-vis the workers. In farm F, several measures have been put in place to counter this challenge.

5.1.4 Progress against clause 11: *Retaliation*

On most farms, victimisation of complainants, which had emerged as an issue in the baseline survey on over half of the pilot farms – is no longer a concern.

Workers and GCMs explained that the following actions taken by Management have been particularly helpful:

- HRD at Farm C has issued a warning against any form of victimization against complainants
- At Farm C, F and D, supervisors have taken part in GCMs' policy cascade training and reiterated the point that victimisation of complaints constitutes a breach of the SH policy.

5.1.5 Progress against clause 7: *Remedial Action towards the proved harasser*

- General workers on 6 farms, made the point that they are satisfied with the way in which both the GCs and HRD are handling arising matters.
- By contrast, workers and GCMs at B and explained that significant challenges persist. At farm B, *some cases are left pending by HRD after GC's recommendations are received.* The GCMs explains that failure by HRD to remedy these cases reflects personal disagreements and lack of collaboration between the GC Chair and HRD.

5.1.6 Progress against clause 9: *Counselling*

The Model policy states that

'Management may seek appropriate professional advice and arrange for counselling for the complainant, during and after the investigation of the complaint, as required. Leave of absence may also be necessary, and Management will give permission for this, and if the complainant's compassionate leave entitlement is exhausted, additional compassionate leave may be granted.'

Only farms A and E report the presence of a trained counsellor within the HRD and health departments. Farms C, D, F and G confirmed that actions to have a qualified team of counsellors were underway.

WRW was unable to gather information on the scale, quality and accessibility of counselling and other support services for complainants and proved victims of sexual harassment. No leave of absence has been awarded, as none of the complaints reported required need for that.

5.2 Impact of the Action Undertaken by Management, GCMs and WRW

- ***Has sexual harassment decreased within the pilot farms?***

According to the respondents in the focus group discussions, the prevalence/frequency of certain forms of sexually harassing behaviour had decreased. They indicated that workers are treating fellow workers with greater respect and sensitiveness, refraining from behavior, which were once widespread, such as making sexually suggestive jokes and touching colleagues and subordinates inappropriately.

Workers attribute the reduction in the frequency of sexual harassment to the following factors:

- ❖ Employees are now wary of the behavior that can be construed as sexual harassment and of the possible consequences of committing sexual harassment;
- ❖ HRDs on most farms are now resolving cases of SH complaints promptly, thus reinforcing the

- ❖ message that SH won't be condoned;
- ❖ The training, the follow up meeting/FGDs and the refresher meeting have provided an opportunity for workers to discuss their experiences of SH and to establish solidarity and greater mutual support, in the event that incidents of SH occur, including sexual offences from line managers.

However, **challenges** were also reported to persist, on farm B. Workers on this farm reported that while sexually harassing behaviour by managers has decreased, this has not ceased. The issues raised by the workers and the GCMs were the following:

- Employees are sometimes deliberately assigned excessive workload so that line managers can promise workers to reduce their workload, if they comply with a sexual request;
- Promise of promotion, allocation of overtime, and threat of non-renewal of contract and of demotion are still used by supervisors and managers to get subordinates to comply with sexual requests.
- Cases of line managers using their authority to request dates to subordinates were still observed;

Workers and GCMs employed at farm B stressed a lack of commitment by some managers and supervisors in complying with the SH policy.

➤ ***Has workers' confidence in Farms' reporting mechanisms increased?***

At the November focus group discussion, general workers were asked if they would report an incident of SH that they observed or experienced. Workers on most farms indicated that they would: they expressed that they had confidence in the new procedures being used by the GC to handle SH issues.

By contrast, workers from farm B stated that they would weigh the nature of the case and the position of the offender before filing a complaint: fear of victimisation would still deter them from reporting.

6: Sustainability of the progress made

➤ ***Have trained employees cascaded policy training to fellow workers?***

GCMs have cascaded training to a high number of workers: approximately 4,100 workers, across the seven farms. At farm C, the GC trains a team of workers for 30 min each week. Farms F and G were allocated time for weekly trainings until all employees were aware of the policy, then this was narrowed down to briefings on the policy during meetings and parades.

A, B and D GCMs have cascaded training on their free time (after work, during trade union meetings, during lunch breaks), as Management has still not allocated time for the GCM to conduct *regular* employees' training.

In farm E, some old employees still unaware of the nature of SH as only new employees are taken through the policy during induction.

While trained general workers have not been allocated time to cascade training, they have been doing so on their free time, during work breaks, or during weekly departmental meetings.

- ***Are managers committed to continue to provide support to trained GCMs, as well as to trained supervisors and managers to cascade training within the farms?***

In early December, WRW held an End of Project Workshop with Human Resource managers from the pilot farms and certification bodies. Representatives from five Farms took part in the workshop. These have pledged to ensure that trained GCMs, trained supervisors and managers are given time to cascade training to their peers. Please refer Section 9: *Next steps* at the end of this document for details of the commitments made.

- ***Which are the gaps in knowledge/skills/competencies, which Management need to address?***

On all 7 farms, the GCMs have requested periodical refresher training to be scheduled by the Management. In three Farms (C, D, F and G) GCMs have raised that workers asked difficult questions, to which they were not able to respond.

A degree of uncertainty and confusion appears to exist on issues such as how to establish the boundary between sexual harassment and consensual relationship, in cases in which acceptance of sexual requests is made a condition for preferential treatment in employment. While they are more confident in their abilities, some GCMs made the point that they need additional and more focused/specific training.

- ***What additional support will GCMs need from Farms Management after the project ends?***

In most farms, the GCMs explained that time allocated for cascade training is not enough – as the issues to explain are complex.

On all farms, the GCMs requested more training on their roles to improve their skills as well as links with support groups to help them handle all reported complaints.

On 5 farms (C, B, G, D and F), GCMs raised a need for Management to hold regular meetings of GCMs- Management- trade union representatives, to review the work undertaken and discuss issues/concerns that arise in performing their duties.

7. Lessons learned from running this pilot project

- ***Have the Model policy and the Detailed Guidelines for Complaint-Handling officials been effective tools to improve prevention and remediation of SH? How?***

WRW compiled a guide for Gender Committee members to plan and conduct investigations into complaints, and to evaluate the evidence they gathered (*The Detailed Guidelines for Complaint-handling Officials*). GCMs from most farms explained that they found this useful.

They also reported that the Model Policy provides a clear framework and clear standards on how reported incidents should be handled by them and by Management.

On the 4th of December WRW requested Managers' input on the changes that should be made to the Policy before this is shared more widely within the sector. Unfortunately, no feedback has been received.

➤ ***Has the involvement of certification bodies contributed to achieving project objectives? How?***

Certification bodies have played a key role in convincing the seven farms to take part in the pilot, and in allowing Workers Rights Watch to access the farms and to train their workforce. They helped the organisation to build a relationship with the management on those farms, and to raise awareness of the problems being faced by workers.

8. Conclusions and Recommendations

Key actions have been taken on a number of farms towards implementing the Model Policy.

Most farms have used different channels to inform employees on the SH policy and on the consequences for breaching it. These channels include Employment contracts and using the GCMs to cascade training to existing and new employees.

While action has been taken to educate general workers, limited action was taken to ensure that junior and senior managers are also fully aware of the *Model Policy* and of the *Detailed Guidelines for Handling SH Complaints*. This is a major concern, considering the crucial role that managers are expected to play in ensuring that the Policy is implemented and SH eradicated (Clause 5 of the Model Policy).

Great progress has been recorded on most farms in the way complaints of SH are now received and resolved: inaction on reported incidents has decreased, observance of confidentiality improved, cases are generally resolved within 4-week timeframe and in most farms (4 out of 7 farms) complaints involving supervisors and managers as the alleged offenders are reportedly handled with impartiality.

However, progress is uneven across and within the pilot Farms.

- Remediation of SH complaints continue to be an issue on one farm (Farm B)
- Trust in the Farm's mechanisms to report and deal with complaints is still low on farms A, B and E where the GCs are still reported to be inactive (haven't proven determination in their work.)
- Sexual harassment by supervisors and managers, particularly implied or expressed promises of preferential treatment in employment or threat of detrimental treatment are still common across four farms, though not direct is still a concern for workers in (Farms B, E and G)

Another key concern is that while counselling support is offered by individuals in farms A and E, there are no defined group of specialists to offer this support within all the farms. Information to employees on relevant community services outside the Farms is only provided to farm C and G.

There are still significant gaps in the knowledge/skills/competencies of complaint handling officials, which need to be tackled. While they are more confident in their abilities, some GCMs felt that they needed additional and more in-depth/ specific training.

Only GCMs in farms C and F were provided with information and guidelines (from HRD) on remedying cases of SH– including the Employer’s accepted standards for disciplinary action.

WRW’s recommendations to the Management are as follows:

(a) Communication of the Policy:

- Farms to endeavor to use all the channels indicated in Model policy to inform employees on the policy (please refer to clause 4 of the Policy);
- Farms to ensure all existing employees are aware of the policy by adequately supporting cascade training;
- Supervisors and managers play a key role in preventing and responding to SH complaints. Moreover quid pro quo is still a strong concern across over half of the pilot farms. It is crucial that senior and junior managers are made aware of their responsibilities as stated in the SH Policy. Farms to organize periodic training for senior and junior managers on their legal duties and specific responsibilities. Farms also to use the supervisors and managers trained by WRW to cascade information to fellow supervisors and managers.

(b) Training and support to the GCMs:

- GCMs are appointed every 2- 3 years. It is important that new GCMs are systematically taken through the Model Policy and *Guidelines*.
- Management should provide information and guidelines on remedying cases of SH– including the Employer’s accepted standards for disciplinary action.
- WRW have compiled the questions and answers discussed at training and refresher training with workers, managers, supervisors and GCMs and hired a legal consultant to review and elaborate on the answers provided. The document, which has been shared with the Management from all farms, should be used as resource material in periodic training of the GCMs and the Management;

(c) Counselling and medical support and/or referral:

- Confidential, free counselling and medical support and/or referral should be available on all farms for complainants and proved victims. Where, these services are not available on the farms, Management should provide information on - as well as transport to/from -local community services, including medical and psychosocial counselling, as required.

(d) Monitoring compliance with the Policy:

- HRD to schedule periodical meetings with the GCMs to review reports on the complaints received and responded to and to ensure that complaints are handled in accordance with the Company's policy and *Detailed Guidelines*;
- Farms/HRD to periodically review the effectiveness of the actions undertaken in reducing sexual harassment, through meeting with workers and workers’ representatives.

(e) Certification bodies to:

- Advice and support the Farms in which significant concerns persist.
- Consider circulating this Report among their auditing teams and encourage their use in monitoring the extent to which progress is sustained and outstanding gaps addressed across the concerned farms.

- Consider circulating this *initial* Report and the model Policy and *Detailed Guidelines* to Farm clients and Farm members, with an aim to raise awareness on sexual harassment at the workplace and strategies and tools to address this.
- Review/Revisit the process whereby Farm clients are audited on the systems that they have in place to deal with sexual harassment.
For instance, certifications to consider using the indicators in the *Self-Audit Checklist* compiled by WRW to assess the extent to which the Policy that certified farms are required to have is implemented 'on the ground'.

9. Next steps: Actions that Management and Certification bodies who attended the End of Project workshop have committed to take, over the next 12 months (i.e. December 2015 to November 2016).

Representatives from 5 farms attended a workshop held on the 4th of December to present and discuss WRW's draft End of Project Report. At this meeting, Growers committed to take the following actions:

- 1. To endeavor to reach out and inform all employees – workers and managers alike- on the SH policy.** Specifically:
 - ❖ To consult with senior managers to add a clause on SH to both the Employee's Handbooks and the Human Resources Manual/Rules and Regulations, in the Farms in which this has not been done yet;
 - ❖ To affix extracts of the Model policy on notice boards and other visible places;
 - ❖ To make arrangements for the GCMs to continue to provide training on SH and on the SH policy (first time training and refresher training);
 - ❖ To ensure managers are given time to cascade information to fellow managers, during meetings;
 - ❖ To request supervisors to attend the training offered by the GCMs;
 - ❖ Farm to schedule time for the GCMs to cascade training.

2. To build and support the capacity of the GCMs to deal with SH

Manager Representatives of the 5 farms have committed to:

- ❖ Ensure that newly appointed GCMs receive adequate training
- ❖ Locate resources in next year's budget for periodic training of the GCMs, supervisor and managers in complaints-handling and paralegal matters, to improve their competency in carrying out their duties;
- ❖ Schedule time for the GCMs to meet with workers and review progress and challenges periodically
- ❖ HRD to schedule periodical meetings with the GCMs to review reports on the complaints received and responded to and to ensure that complaints are handled in accordance with the Company's policy and *Detailed Guidelines*;
- ❖ At Farm B, HRM committed to hold election of the GCMs and of its Chair. No confirmation on whether this was done.

3. To take steps towards putting counselling support in place on the farm for victims of SH:

- ❖ HRMs expressed a need to have a counselling unit in place to support victims of SH.

- ❖ Farms A, C, and F committed to select and train a team of workers who will be offering this type of support.
- ❖ HRMs from Farm B and D pledged to locate resources to provide counselling training to the GCMs.

4. To improve workers-management relationships:

- ❖ HRMs expressed a need for HRD to hold periodical meetings with the workers, to give workers an opportunity to voice their concerns.
- ❖ All Farms have committed to schedule regular HRD/GCMs meetings to learn about workers' concerns and grievances.

At the End of Project workshop, **certification bodies** have committed to take the following actions:

- The certification bodies will keep monitoring the seven pilot farms, to see what progress is made in addressing outstanding problems presented in this Report;
- In July 2016, they will contract an external consultant to review progress on the 7 farms and write another report
- To share the findings from the review by an external consultant with a number of growers who are already certified with them.

Annexes

Table 1: Model Sexual Harassment Policy, recap of main clauses and progress made on the pilot farms according to the workers and the GCMs.

Policy clauses	Target/standard established in the Policy	Progress made
Clause 4: Communication of the Policy to Employees	<ol style="list-style-type: none"> 1. Farms to use multiple channels to inform Employees on the Policy; 2. Farms to organize periodic training for senior and junior managers on their legal duties and specific responsibilities to prevent and respond to complaints of SH. 	<ol style="list-style-type: none"> 1. Good: At A, C, D, F and G- multiple channels used. 2. Limited: It appears that in none of the 7 farms, periodic training is offered to senior and junior managers on their legal duties and specific responsibilities organised by HRD across the 7 farms.
Clause 6: Procedure to report and to resolve allegations of SH	<ol style="list-style-type: none"> 1. GCMs are given time to investigate reported incidents. 2. Complaints of SH are investigated and resolved within a 4 weeks timeframe 	<ol style="list-style-type: none"> 1. Good on all farms, except from farm B and E where cases are mainly handled by the HRD 2. Limited at Farm B: remediation is sometimes delayed
Clause 7: Remedial Action towards Proved Offender	The remedial action is administered by HRMs in consultation with the Gender committee and/or other designated workers' committees.	<ul style="list-style-type: none"> ▪ Good at C,D, G and F ▪ Limited at farm E and B. ▪ In farm A, no case forwarded to the HRM by the GC.
Clause 9: Counselling	Professional advice and psychological counselling for complainants and proved victims are available on all farms.	Support provided by skilled HRO and nurse in farms A and E respectively. Outsiders contracted for support services in farms C and G <ul style="list-style-type: none"> ▪ Limited in farm B, D, F
Clause 10: Confidentiality	Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation.	<ul style="list-style-type: none"> ▪ Good progress at C, D, F and G
Clause 11: Retaliation	Retaliation against any individual who reports an incident of sexual harassment or who participates in an investigation of a claim of	<ul style="list-style-type: none"> ▪ Good progress at C, D,F and G ▪ Limited at Farm B(No case to ascertain this from A and E)

	sexual harassment is prohibited and represents a serious violation of this policy.	
--	--	--

Workers' recommendations to KFC/FTA/WRW

1. Training to be offered to the gender committee (GC) members on how to investigate cases, during which they should be provided with materials especially case studies and pictorials, translated training materials, to aid them during cascading and analyzing complaints.
2. To be in attendance of the GC meetings at least once annually and advocate for exchange forums between GCMs from pilot farms through focus groups in order to share ideas and skills.
3. To help in ensuring top cadre employees understand the policy
4. Add more topics to the trainings e.g. life skills and legal framework for different policies
5. Offer refresher trainings to ensure new members of the committee know their roles and responsibilities, and to help the committee members evaluate themselves and progress made.
6. To ensure the policy caters for managers by ensuring the Directors sign a directive on the policy. The GC might not necessarily have power/feel free to investigate managers and the directors