

Gender Equality in Law

A Model Policy



The Institute for African Women in Law (IAWL) is a non-profit, nongovernmental organization established in 2015. It is committed to supporting the formidable works of women in law across the continent of Africa and the Diaspora. Our mission is to be a focal point for addressing issues across the legal and judicial professions. The institute is headquartered in Washington, D.C., USA.

This model policy is part of IAWL's Gender Equality in Law Campaign (GELC).

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Executive Director's Note

The Gender Equality in Law Campaign (GELC) by the Institute for African Women in Law (IAWL) aims to dislodge inequitable workplace cultures, attitudes and practices that perpetuate inequities women in law face. Persistent patriarchal attitudes and practices, lack of transparency, dysfunctional accountability structures, and a culture of silence foster gender inequities in the legal workplace. GELC seeks to raise awareness about these institutional challenges by advocating for women-inclusive institutional policy and practice reforms. This Gender Equality in Law Model Policy (Model Policy) is a means to the expected end of a gender-inclusive work environment. In the 2023 GELC survey that informed our research "Gender Equality in Law Across Africa: Is the Glass Half Full?", a gender equality policy was the top recommendation for igniting change, with six out of every ten respondents recommending the creation and adoption of a gender policy.

The Model Policy focuses on four priority areas: equitable hiring and promotion, equal pay for equal work, sexual harassment and gender and bias and stereotypes. The Model Policy has been carefully curated through multiple expert and stakeholder engagements and reviews to comprehensively address all foreseeable considerations that could arise in a work environment. As a Model Policy, law firms, legal institutions, and organizations can wholly adopt and implement this framework in their efforts to promote inclusive work conditions. For other organizations that have a gender policy already, this Model Policy can be used as a reference point in drafting tailor-made gender-inclusive policies or revising existing ones accordingly.

IAWL acknowledges that policymaking and adoption is only a first and necessary step toward advancing gender equality in the workplace. Beyond adopting gender equality policies, we urge law firms and institutions to make an ongoing commitment to ensure full and effective implementation of the provisions in the policies. Enforcing the policy is the only way to protect the equitable interests and rights of women and men in the workplace. A gender-equitable work environment is not just a goal, but a catalyst for positive change. It is crucial for women in law to thrive and for the legal profession as a whole to reach its full potential. Therefore, we call on all law firms, institutions, organizations, and individuals to join us in this Gender Equality in Law Campaign to activate gender-equitable policies that drive institutional change, foster productivity, and lead to at-scale development.



EXECUTIVE DIRECTOR

INSTITUTE FOR AFRICAN WOMEN IN LAW

Policy is a Floor, Not a Ceiling



Harassment and inequality in the workplace [are] not solved by having policies in place. Many anti-harassment and anti-discriminatory policies are complicated and difficult to interpret, and few people read or follow them, even those in leadership, and fewer still find relief by resorting to them. Men deflect such allegations by resorting to jokes, excuses or shaming women as overreacting or being too sensitive. Further, when a woman reports harassment, social and cultural norms mean she is the one [who] becomes the highlight of a scandal. Where a woman is believed or at least has some concrete proof of the incident(s), people are more interested in pitying, infantilising or condemning her than in the fault of the perpetrator. Policies also usually only cover in-house harassment and discrimination even though external actors engaging with the institution are also perpetrators of harassment and discrimination, including partner institutions, clients, service providers, etc.

Having a code of conduct that is signed by staff and externals, as well as imbuing a culture of equality within the institution would help to address the lacunas in policy. Regular engagements, [and] mandatory continuous legal education based on gender equality may work to debunk socio-cultural myths that drive inequality and buttress any policies in place. And not just downward-looking policies, it is assumed that once in leadership, women are immune from discriminatory practices, but this is not so. Male colleagues often find it difficult to accept instructions or correction from female superiors and work to undermine their authority with belittling remarks or names and, in some cases, outright defiance or sexual innuendo. Sometimes external actors will refuse to recognise the woman's authority and speak instead to her male junior even when she is in the room. Many male colleagues will not call out or correct the situation and even take advantage of it.



-Anonymous GELC Survey Respondent, 2023

Executive Summary

The Institute for African Women in Law (IAWL) is a pan-African non-profit, non-governmental organization committed to supporting the formidable works of women in law across Africa and the diaspora. Our goal is to be a focal point for addressing issues across the legal profession—bar, bench, and legal academy—and our vision is to build a network of legal professionals devoted to using the law as a tool for positive societal change and development.

The Gender Equality in Law Campaign (GELC) is a drive to raise awareness of the challenges women face in the legal profession. It has three main goals:

1. **Awareness:** To use evidence-based research to raise awareness about the institutional and structural challenges women in law face.
2. **Advocacy:** A continental advocacy effort for institutional policy and practice reforms to create women-inclusive legal professions where women thrive and lead.
3. **Activation:** Adopt, promote and enforce policies, practices and institutional changes for equitable and women-inclusive work conditions.

Earlier research by IAWL on women in law and leadership identified sexual harassment, unequal pay, low promotion and gender biases as some of the common challenges women face in the legal profession. Consequently, the GEL campaign raises global awareness on these issues, ignites gender consciousness and partners with organizations to achieve institutional changes in prevailing patriarchal practices, culture, and policies within the legal profession across Africa. The campaign also aligns with the global and continental gender equality and inclusivity agenda. It advances through research and advocacy the United Nations' Sustainable Development Goal (SDG) 5 on gender equality, SDG 6 on inclusive societies and institutions at all levels, and goal 17 of aspiration 6 of the African Union's Agenda 2063 on full gender equality in all spheres of life. Therefore, the GELC research report detailing the findings is an output of the campaign.

This Gender Equality in Law Model Policy is another significant output of the campaign. Preliminary desktop research conducted by IAWL showed that a substantial number of publicly available policies on the GELC focal areas within Africa were by Higher education institutions. A significant proportion of existing policies available in the public domain were also by international organizations. The policies readily available in these two sectors - higher education institutions and international organizations- focused mainly on sexual harassment with little attention (and in some cases no attention) given to the equally essential issues of equal pay for equal work, and gender bias and stereotypes.

Gender equality in law-related policies within the legal profession, especially among law firms, was not readily available online. Therefore, the Institute embarked on an empirical inquiry by emailing 60 top law firms across the continent to assess the existence or otherwise and the content of GEL-related policies within the legal profession. The email asked three questions:

1. Does your firm have a policy that covers either or all of these:
 - (a) sexual harassment;
 - (b) equitable hiring and promotion;
 - (c) equal work, equal pay; and
 - (d) gender-based discrimination?YES/NO
2. If "YES", which of the four do you have a policy on?
3. Could you share with us a copy of the above policy if you do?

Our email survey did not yield much results since the response rate was low. While we cannot accurately diagnose the reason for the low response, a possible reason is survey fatigue among lawyers and law firms. However, from the few responses received, it appears that some of the law firms that have such policies consider them "confidential" documents. It is hardly justifiable to classify a policy designed to promote gender equality as private or confidential. IAWL's GEL Model Policy, therefore, makes a public event of a policy framework that supports gender equality in law.

The making of a model policy such as this one requires soliciting and incorporating technical, expert and stakeholder inputs. Consequently, the Institute organized an Expert Forum of independent consultants to review the first draft thoroughly. IAWL sent out invitations to 23 experts, 16 responded to our invitation, and nine confirmed their availability to participate in the review process. The review work of the nine experts spanned a period of seven weeks starting from when they received the draft policy for their expert review till the consultative meeting held on February 23, 2024. Additionally, the Institute engaged with institutional stakeholders. We sent out 42 invitations, 12 institutions accepted our invitation, and seven attended the stakeholder meeting held on March 1, 2024. We also involved our board members, some of whom shared their proposed recommendations to enrich the policy. Thus, this model policy is the result of the collaborative efforts of IAWL, its board members, a team of experts and a meeting of stakeholder institutions in the legal profession across the continent.

The policy serves as a model document to guide firms, institutions and organizations within the legal profession to create comprehensive policy frameworks regarding the (a) prevention of and protection against sexual harassment, (b) equal pay for equal work, (c) equitable hiring and promotion, and (d) protection against other forms of gender bias and stereotyping in the workplace.

While the policy is primarily intended for use within the legal profession and to protect women in law, who are often the victims of the challenges identified, other non-legal institutions may also find it a useful guide to inform their gender equality policies.

Reasons to adopt the GELC model policy

The benefits of an organization, institution or law firm adopting the GELC policy include to:

1. Promote respect for the dignity of all persons in and associated with the organization/institution/law firm in line with international human rights and labor regulations;
2. Demonstrate the organization/institution/law firm's serious commitment to protecting against sexual harassment, equal pay for equal work, equitable hiring and promotion, and protection against other forms of gender bias and stereotyping in the workplace;
3. Implement well-laid-out procedures for reporting and investigating complaints;
4. Provide clear sanctions and disciplinary responses to GEL-related complaints; and
5. Minimize the risk of harm to employees and other persons associated with the organization/institution/law firm and the risk of civil liability against the organization/institution/law firm for sexual harassment, unequal pay for equal work, inequitable hiring and promotion and gender bias and stereotyping.

How organizations/institutions/law firms should approach the GELC model policy

The GELC model policy serves solely as a guide. It should not be taken to represent the ideal or paramount policy on gender equality issues. The model policy has been designed for the legal work environment. In adopting it, organizations/institutions/law firms should look at their specific contexts and tailor the policy to fit their circumstances and structure. We provide some recommendations in text boxes and hyperlinked appendices containing additional sample policies to draw from.

EQUITABLE HIRING AND PROMOTION



Equitable Hiring and Promotion

1. Definition of Equitable Hiring and Promotion

Equitable hiring and promotion refers to creating a fair and just process for hiring and promoting individuals regardless of their gender by acknowledging and addressing existing systematic biases and making intentional efforts to create a diverse, equitable and inclusive environment.

2. Equitable hiring and promotion draft policy statement

[Name of Firm/Organization/Institution] is committed to equitable hiring and promotion practices and intends to use this policy to serve that purpose. The policy applies to all job applicants, potential employees and employees of [Name of Firm/Organization/Institution] and all hiring-related activities and promotions, both lateral and vertical.

3. Equitable Hiring

- 3.1. [Name of Firm/Organization/Institution] is an equal employment opportunity provider that prioritizes diversity, equity, inclusion and belonging in all hiring processes.
- 3.2. The equitable hiring criteria guideline/checklist of [Name of Firm/Organization/Institution] (see appendix) should be strictly adhered to by the hiring personnel/committee.

IAWL'S RECOMMENDATION:

1. The proposed appendix should include both generic and firm-specific questions that should not be asked at interviews, e.g., questions about a person's reproductive health, marital or domestic status, family commitments, tribe/ethnicity, religious affiliation, etc.
2. Indicate the following explicitly:
 - i. The hiring criteria are clear, and the grading for questions is clear.
 - ii. Job postings will be inclusive and free from discriminatory language
 - iii. Interview panels will be diverse, representing different backgrounds and perspectives
 - iv. Questions will focus on assessing skills, qualifications, and relevant experience
 - v. Decisions will be based on merit, and candidates will be assessed fairly without consideration of gender, race, age, etc

3.3. Members of the hiring committee will be trained on conscious and unconscious bias and on the content of a hiring manual to be provided. Human Resource (HR) or recruitment managers should provide guidelines to panel members on conscious and unconscious bias and ensure that staff, trustees, and volunteers undergo relevant training on a regular basis.

IAWL'S RECOMMENDATION:

A hiring manual could be an appendix to this policy.

4. Equitable Promotion Criteria

4.1. Any form of discrimination in considering the promotion of a worker based on sex, gender, race, ethnicity, sexual orientation, religion, or other grounds is prohibited.

IAWL'S RECOMMENDATION:

1. A list of qualifications needed for promotion to each position/rank should be provided. (Detailed criteria could be an appendix to this policy, in the Human Resource Manual or other Promotion Criteria document).
2. Intersectional criteria for equitable promotion should also be clearly stated, such as disability, age, status (married/single/widowed/no children), social class (rich/poor), and orientation. Some of these identities are overlooked in the criteria for promotion even when declared by the applicant: disability, age, and status. It can also affect the wage offered/remuneration for the post.
3. An indication of how promotion decisions will be arrived at and the timelines by the designated committee.

5. Promotion Process

IAWL'S RECOMMENDATION:

1. An itemized list of the promotion process from start to finish should be provided here. For example, it should include how positions will be advertised, how a qualifying candidate can initiate the process, who and how evaluation will be done, timelines, and appeal procedures.
2. Regarding timelines, it is important to mention that while clocking a number of years in some cases may be a promotion criterion, employers should be flexible to allow exceptional candidates who may not meet the stipulated number of years to go through the process.
3. The statement of commitment of the law firm, institution, organization or employer may also state the role that in-house mentors and coaches may play in the promotion process.
4. Explicit statements relating to the following should be included:
 - i. Promotion opportunities will be communicated transparently, and criteria will be clearly defined.
 - ii. Decisions on promotions will be made based on performance, skills, and potential, avoiding any form of favoritism or bias.
 - iii. Persons who have overstayed in a particular position without promotion will be invited to a hearing on why they have overstayed and the assistance they need.
 - iv. Regular reviews of promotion processes will be conducted to identify and rectify any unintentional biases.
 - v. Employers are working to remove bias by ensuring that all work is rewarded in promotions. Employers should offer different pathways to promotion (not just rely on employee applications).

6. Open Communication and Prompt Feedback

[Name of Firm/Organization/Institution] will ensure open communication and prompt feedback throughout the hiring and promotion processes by giving applicants regular updates on the hiring/promotion application and providing feedback at the end of the process indicating the areas for improvement and the necessary professional development programs to undertake.

7. Reporting inequitable promotion

For this section, we recommend that each organization/institution/firm identify what works best for them.

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Establish a designated in-house person, committee or body responsible for receiving and handling inequitable promotion complaints;
- (b) Lay out the options for reporting allowing for informal, formal and legal processes; and
- (c) Guarantee the complainant's right to confidentiality and protection from reprisal.

2. The policy should not prevent the complainant from electing to use a legal means without first engaging the internal procedures.

3. A complaint form can be designed, which complainants can pick up or download to fill.

4. Reporting may also be made orally by the complainant. Whatever form it takes, reporting may also be anonymous.

7.1. The Inequitable Promotion Committee/Disciplinary Committee/Office/Person

Here, the details of the institution's designated committee or person to handle cases of inequitable promotion should be provided, including its purpose, membership, appointment procedures, tenure, processes, etc. The committee's composition should also consider the gender sensitivity of its members and gender representation.

7.2. Avenues for Reporting

A. Formal Reporting Mechanism

A formal reporting mechanism would involve lodging an official complaint with the designated in-house receiving body or committee to trigger official investigations.

B. External Reporting Mechanism

An external reporting mechanism could be a complaint made to a national labor commission, employment tribunal or other similar statutory body or filed at the courts. This external reporting option to rep external reporting should not also preclude the institution/organization/law firm from conducting its independent investigation and reserves the right to defer.

7.3. Confidentiality

All internal disciplinary processes for complaints filed will be kept confidential and will not be revealed to external persons unless the parties involved consent to it or there is a legal reporting obligation to third parties.

8. Investigation Procedures and Mechanisms

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Provide a detailed step-by-step procedure for the various reporting mechanisms listed in section 7 above, and
- (b) Outline internal appeal procedures as appropriate for the firm/institution/organization's context.

2. See appendices for sample policies to draw from to align with the firm/institution/organization's structures.

8.1. Informal Reporting Mechanism

Insert a detailed firm/institution/organization-specific informal reporting procedure here.

8.2. Formal Reporting Mechanism

Insert a step-by-step firm/institution/organization-specific formal reporting procedure here.

8.3. External Reporting Mechanism

Insert external reporting alternative here based on the existing legal avenues available in the specific country.

8.4. Appeal Procedures

Insert a detailed firm/institution/organization-specific appeal procedure here.

IAWL'S RECOMMENDATION:

1. The section on appeals may also include grounds or reasons for considering an appeal, such as new evidence, unfair initial procedures, harsh sanctions, etc.
2. Definite timelines should be included in detailing the procedure to ensure speedy delivery of justice.

9. Policy Enforcement

- 9.1. This policy will be implemented and enforced by [insert name of specific body, committee, or individuals].

IAWL'S RECOMMENDATION:

This section should institutionalize and explicitly detail an internal Monitoring and Evaluation (M&E) mechanism.

- 9.2. Every supervisor is also responsible for ensuring that their team members are fully aware of the policy's content. It is also the responsibility of every supervisor to ensure that their team members are fully aware of the content of the policy.
- 9.3. A copy of this policy will be made available on the [name of firm/institution/organization]'s website. Current employees will receive a [soft/hard] copy of the policy immediately after approval. All new employees will also be furnished with a [soft/hard] copy of the policy upon employment.

10. Policy Review

- 10.1. This policy will be reviewed and updated periodically to reflect best practices regarding job duties, qualifications, performance and legal changes.

IAWL'S RECOMMENDATION:

To ensure accountability, specific timelines (e.g., annually, biennially, etc.) should be stated instead of "periodically."

10.2. The review process will also be informed by anonymous employee feedback on whether the policy is effective.

10.3. The review process shall be initiated as follows:

IAWL'S RECOMMENDATION:

1. The review process should be outlined here, including who can initiate it, the extent of employees' participation, the approval of updated policy, etc.
2. See appendices for examples to draw from.

10.4. The [name of organization/firm] commits to taking appropriate measures to rectify any disparities found after the review process, such as adjusting salaries or benefits.

EQUAL PAY FOR EQUAL WORK



Equal Pay For Equal Work

1. Definition of Equal Pay for Equal Work

- 1.1. Equal pay for equal work requires that all persons in the workplace regardless of sex, gender, race, disability, age, marital status (single, married, civil partnership, cohabiting, widowed, etc), ethnicity, sexual orientation, religion, nationality, or other grounds, should be paid equally for equal work.
- 1.2. Equal work is not strictly synonymous with sameness or identical work but also covers substantially similar work based on the job description or content rather than the job title or completely different work that can be shown to be of equal value based on objective criteria. The objective criteria include skills, effort, levels of responsibility, working conditions and qualifications.
- 1.3. Equal pay applies to forms of all remuneration and benefits, including salary, overtime pay, bonuses, per diem, allowances, life insurance, vacation and holiday pay, cleaning or gasoline allowances, hotel accommodations, and reimbursement for travel expenses.

IAWL'S RECOMMENDATION:

A firm/institution/organization may not reduce the pay of its male or female workers to equalize their pay.

2. Equal pay for, equal work draft policy statement

[Name of Firm/Organization/Institution] is committed to providing equal pay for equal work, transparency, equity in compensation among workers of comparable ranking and suitable conditions for all persons to do equal work. By this policy, [Name of Firm/Organization/Institution] establishes its full dedication to seriously investigate and promptly respond to all complaints of inequitable pay for equal work done. This policy applies to all work-related activities, both in and outside the office, and all forms of compensation, including salaries, bonuses, allowances and other benefits.

3. Prohibited Conduct

- 3.1. Any form of discrimination in providing equal pay for equal work and distribution of equitable workload based on sex, gender, race, disability, age, marital status (single, married, civil partnership, cohabiting, widowed, etc), ethnicity, sexual orientation, nationality, religion, or other grounds is prohibited.
- 3.2. The prohibition of all forms of discrimination set out in 3.1. above aligns with [name and section of existing legislative framework].
- 3.3. There will be zero tolerance for any form of retaliation or victimization of any employee who raises concerns about unequal pay for equal work done.

4. Pay Transparency

To ensure transparency regarding equal pay for equal work, the [name of organization/firm] will employ various ways or means, including:

- a. Publishing salary ranges for the various positions available;
- b. Conducting regular audits of pay equity;
- c. Responding promptly to all equal pay complaints and taking appropriate remedial action;
- d. Providing persons involved in making salary and benefits decisions with an equal pay scheme guide; and
- e. Regularly monitoring and evaluating the impact of the equal pay policy and practices.

5. Remedies

- 5.1. Employees who believe they are not receiving or have not received equal pay for equal work done as their colleague may submit a complaint to the [insert name of specific body, committee, or individuals] for investigation and the necessary redress.
- 5.2. Where the [insert name of specific body, committee, or individuals] finds that an employee was indeed not given equal pay for equal work done as their colleague, it may order any of the following remedies as it finds appropriate: specific performance, compensation, right of action, damages, attorney's fees, cost of litigation, fines/pecuniary sanction, etc.

6. Equitable Work

[Name of Firm/Organization/Institution] commits to providing conditions suitable for women to do equal work as their male counterparts where necessary through means such as remote working to allow for caregiving responsibilities, equitable allocation of work, and other similar measures.

SOMETHING TO NOTE:

Equal work does not mean that the rights of women for maternity and related leave and other rights will be undermined.

7. Reporting unequal pay for equal work

For this section, we recommend that each organization/institution/firm identify what works best for them.

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Establish a designated in-house person, committee or body responsible for receiving and handling unequal pay for equal work complaints;
- (b) Lay out the options for reporting allowing for informal, formal and legal processes; and
- (c) Guarantee the complainant's right to confidentiality and protection from reprisal.

2. The policy should not prevent the complainant from electing to use a legal means without first engaging the internal procedures.
3. A complaint form can be designed, which complainants can pick up or download to fill out.
4. Reporting may also be made orally by the complainant. Whatever form reporting takes, it may also be anonymous.

7.1. The Equal Pay Committee/Disciplinary Committee/Office/Person

Here, the details of the institution's designated committee or person to handle cases of unequal pay for equal work should be provided, including its purpose, membership, appointment procedures, tenure, processes, etc. The committee's composition should also consider the gender sensitivity of its members and gender representation.

7.2. Avenues for Reporting

A. Formal Reporting Mechanism

A formal reporting mechanism would involve lodging an official complaint with the designated in-house receiving body or committee to trigger official investigations.

B. External Reporting Mechanism

An external reporting mechanism could be a complaint made to a national labor commission, employment tribunal or other similar statutory body or filed at the courts. This external reporting option to rep external reporting should not also preclude the institution/organization/law firm from conducting its independent investigation and reserves the right to defer.

7.3. Confidentiality

All internal disciplinary processes for complaints filed will be kept confidential and will not be revealed to external persons unless the parties involved consent to it or there is a legal reporting obligation to third parties.

8. Investigation Procedures and Mechanisms

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Provide a detailed step-by-step procedure for the various reporting mechanisms listed in section 7 above, and
- (b) Outline internal appeal procedures as appropriate for the firm/institution/organization's context.

2. See appendices for sample policies to draw from to align with the firm/institution/organization's structures.

8.1. Informal Reporting Mechanism

Insert a detailed firm/institution/organization-specific informal reporting procedure here.

8.2. Formal Reporting Mechanism

Insert a step-by-step firm/institution/organization-specific formal reporting procedure here.

8.3. External Reporting Mechanism

Insert external reporting alternative here based on the existing legal avenues available in the specific country.

8.4. Appeal Procedures

Insert a detailed firm/institution/organization-specific appeal procedure here.

IAWL'S RECOMMENDATION:

1. The section on appeals may also include grounds or reasons for considering an appeal, such as new evidence, unfair initial procedures, harsh sanctions, etc.
2. Definite timelines should be included in detailing the procedure to ensure speedy delivery of justice.

9. Policy Enforcement

9.1. This policy will be implemented and enforced by [insert name of specific body, committee, or individuals].

IAWL'S RECOMMENDATION:

1. This committee should include the officer responsible for managing the finances of the firm/organization/institution, such as the accounts officer or financial manager.
2. The finance officer will provide input on the available resources earmarked for enforcement.

9.2. Every supervisor is also responsible for ensuring that their team members are fully aware of the policy's content. It is also the responsibility of every supervisor to ensure that their team members are fully aware of the content of the policy.

9.3. A copy of this policy will be made available on the [name of firm/institution/organization]'s website. Current employees will each be given a [soft/hard] copy of the policy immediately after approval. All new employees will also be furnished with a [soft/hard] copy of the policy upon employment.

IAWL'S RECOMMENDATION:

This section should institutionalize and explicitly detail an internal Monitoring and Evaluation (M&E) mechanism.

10. Policy Review

10.1. *This policy will be reviewed and updated periodically to reflect best practices regarding job duties, qualifications, performance and legal changes.*

IAWL'S RECOMMENDATION:

To ensure accountability, specific timelines (e.g., annually, biennially, etc.) should be stated instead of "periodically."

10.2. The review process will also be informed by anonymous employee feedback on whether the policy is effective.

10.3. The review process shall be initiated as follows:

IAWL'S RECOMMENDATION:

1. The review process should be outlined here, including who can initiate it, the extent of employees' participation, the approval of updated policy, etc.
2. See appendices for examples to draw from.

10.4. The [name of firm/institution/organization] commits to taking appropriate measures to rectify any disparities found after the review process, such as adjusting salaries or benefits.

SEXUAL HARASSMENT PROTECTION



Sexual Harassment Protection

1. Definition of Sexual Harassment

Sexual harassment means an unwelcome, offensive, serious or persistent implicit or explicit behavior, suggestion, message, remark, request and/or demand that is sexual in nature or a threat of reprisal or actual reprisal for refusing to comply with a sexually oriented request or other conduct based on sex, or gender. These actions may be by a worker or other person in the workplace or who interacts with the firm/organization/institution (including employers, managers, employees, clients, partners, suppliers, contractors, consultants, volunteers, vendors, guests, board members, job applicants, interns, and others who have dealings with institutions/organizations) to another worker or person in a private or public place, whether physical, verbal, non-verbal, remote or electronic which aim at, result in or are likely to result in physical, psychological, sexual or economic harm.

IAWL'S RECOMMENDATION:

This definition combines definitions from multiple sources in the references. Institutions, organizations and law firms are encouraged to use this definition or any variant of it that encompasses the various modes and forms sexual harassment may take.

2. Sexual Harassment Zero Tolerance Draft Policy Statement

[Name of Firm/Organization/Institution] is committed to providing a working environment that is free from all forms of sexual harassment for all its employees regardless of their rank, location, type or duration of their employment including [a list of other persons within the workplace or who interact with the workplace that may not necessarily be tagged as employees e.g., clients, suppliers, contractors, consultants, volunteers, vendors, guests, board members, job applicants, interns etc]. Through this policy, [Name of Firm/Organization/Institution] establishes a zero-tolerance policy for sexual harassment and is dedicated to seriously investigating and promptly responding to all sexual harassment complaints related to the [Name of Firm/Organisation/Institution]'s work assigned both in and outside of the office (such as off-site meetings, business travel, office-sanctioned social events, electronic communications, and digital spaces) and at all times during and outside of regular working hours.

3. Prohibited Conduct

IAWL'S RECOMMENDATION:

This part should detail the activities that constitute sexual harassment stating that 'sexual harassment includes but is not limited to the following activities...'. Each conduct should have a list of examples of other conduct that fit under that category. Support for such prohibitions in the existing law of the law firm/organization/institution's geographic location or under which it is registered should also be mentioned.

3.1. Physical Conduct

Physical conduct that amounts to sexual harassment may include:

- a. Unwelcome/unwanted and direct/indirect touching, kissing, stroking, hugging, strip-searching, fondling, patting, grabbing, rubbing, or pinching.
- b. Physical violence that is sexual in nature, including sexual assault and rape.
- c. Using intimidating gestures.
- d. Blocking another employee's movement.
- e. Unnecessary close physical proximity or contact which is sexual in nature.

3.2. Verbal Conduct

Verbal conduct that amounts to sexual harassment may include:

- a. Derogatory comments, innuendos, suggestions, hints, and sexual advances with sexual overtones
- b. Jokes or insults that are sex-related or based on a person's sex or gender non-conformity.
- c. Sexually graphic comments about a person's body, appearance, age, etc.
- d. Inappropriate inquiries about a person's sex life.
- e. Making inappropriate sounds that are sexually suggestive, such as kissing sounds, whistling, or smacking lips.
- f. Sending sexually explicit messages by electronic or non-electronic means (such as phone, email, text, notes, letters, etc).
- g. Sexually-oriented cyberbullying, discussing sexual relations/stories/fantasies at work or other inappropriate places, using sexually suggestive nicknames or terms of endearment.

3.3. Non-Verbal Conduct

Non-verbal conduct that amounts to sexual harassment may include:

- a. Leering or other sexually suggestive gestures.
- b. Indecent exposure.
- c. Displaying sexually explicit images.
- d. Blocking a hallway or doorway.
- e. Blowing kisses, winking, or staring
- f. Following or stalking.

3.4. *Quid Pro Quo* Harassment

Quid pro quo sexual harassment involves making conditions of employment or advancement dependent on sexual favors, either explicitly or implicitly. It includes seeking sexual favors or making or coercing sexual advances, usually by a senior worker (owner, manager, senior partner, etc) from a junior worker (associate, pupil, etc) in exchange for a benefit (promotion, pay increment, recommendation, preferential treatment) or avoidance of a sanction or loss (demotion, pay cut, poor performance review, dismissal, disciplinary measure).

IAWL'S RECOMMENDATION:

Where there is an explicit legal prohibition of any of the above in the country concerned it must be stated. E.g. As stated in XYZ law.

3.5. The Use of the Internet

Any prohibited conduct amounting to sexual harassment that occurs via the Internet, social media or other digital platforms is also considered sexual harassment.

3.6. Exceptions

A. Conduct not constituting sexual harassment

Physical, verbal or non-verbal conduct does not constitute sexual harassment, that is, not prohibited by law if it falls into two categories:

1. *Conduct between two or more mutually consenting adults.* There was an express mutual consent between two or more persons of the requisite age and capacity as prescribed by law; or
2. *Everyday non-sexual conduct permissible within the organization:*
 - a. Physical: hugs to greet, comfort or congratulate a person, etc.
 - b. Verbal: compliments about their dress/hairstyle/cut, request to go on a date, etc
 - c. Non-verbal: thumbs up gesture in appreciation of something said/done, etc.

B. Withdrawal of complaint

A complainant may withdraw a complaint of sexual harassment if it was between consenting adults unless there is reason to believe that the withdrawal was influenced by vitiating factors like undue influence, duress, misrepresentation about the conduct in question, or a power differential in the work relationship.

C. Withdrawal of consent after the conduct.

1. Where consent is withdrawn after the conduct, the matter may still be investigated as sexual harassment in order to establish the circumstances under which the consent was withdrawn.
2. The investigation will establish whether any vitiating factors, such as undue influence, duress, or a power differential in the work relationship, may have affected the withdrawal of the consent.
3. Unwelcome conduct perpetrated after the withdrawal of consent would amount to sexual harassment.

4. Reporting Sexual Harassment

For this section, we recommend that each organization/institution/firm identify what works best for them based on its size, available human and financial resources and internal structures of power.

IAWL'S RECOMMENDATION:

1. The section on reporting sexual harassment should:
 - (a) Establish a designated in-house person, committee or body responsible for receiving and handling sexual harassment complaints;
 - (b) Lay out the options for reporting allowing for informal, formal and legal processes; and
 - (c) Guarantee the complainant's right to confidentiality and protection from victimization and retaliation.
2. A complaint form can be designed that complainants can pick up or download to fill out. For a sample complaint form, see the University of Pretoria Anti-Discrimination policy and Amnesty International USA Code of Conduct in the appendix.
3. Reporting may also be made orally and by the complainant, third party or bystander.
4. Reporting in whatever form it takes may also be anonymous. For such samples, see the WHO Policy on Preventing and Addressing Sexual Misconduct.
5. See appendices for additional sample policies to draw from.

4.1. The Sexual Harassment Committee/Disciplinary Committee/Office/Person

Here, the details of the institution's designated committee or person handling sexual harassment cases should be provided, including its purpose, membership, appointment procedures, tenure, processes, etc.

The committee's composition should also take into consideration the gender sensitivity of its members and gender representation.

4.2. Avenues for Reporting

A. Informal Reporting Mechanism

An informal reporting mechanism would involve an informal settlement between the complainant and the alleged harasser by a neutral third party within the institution or from outside the institution at the complainant's request. Informal reporting may also be done orally.

Where there is informal reporting, a firm/organization/institution may provide some documentation of the informal process for its records.

B. Formal Reporting Mechanism

A formal reporting mechanism would involve lodging an official complaint with the designated in-house receiving body or committee to trigger official investigations.

C. External Reporting Mechanism

An external reporting mechanism could be a complaint made to a national labor commission, employment tribunal, the police, or other similar statutory body or filed in court.

This external reporting option should not also preclude the institution/organization/law firm from conducting its independent investigation and reserves the right to defer.

External reporting should be after exhausting all internal means of remedy or where the case involves criminal aspects.

4.3. Confidentiality

All internal disciplinary processes for complaints filed will be kept confidential and will not be revealed to external persons unless the parties involved consent to it or there is a legal reporting obligation to third parties.

4.4. Protection from Reprisal

No hardship, loss, benefit, or penalty will be imposed on an employee in respect of any of the following actions: filing or responding to a bona fide complaint of discrimination or harassment, appearing as a witness in the investigation of a complaint, or serving as an investigator of a complaint. Employees are protected from any negative consequences for engaging in these protected activities.

5. Investigation Procedures and Mechanisms

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Provide a detailed step-by-step procedure for the various reporting mechanisms listed in section 4 above, and
- (b) Outline internal appeal procedures as appropriate for the firm/institution/organization's context.

2. See appendices for sample policies to draw from to align with the firm/institution/organization's structures.

5.1. Informal Reporting Mechanism

Insert a detailed firm/institution/organization-specific informal reporting procedure here.

5.2. Formal Reporting Mechanism

Insert a step-by-step firm/institution/organization-specific formal reporting procedure here.

5.3. External Reporting Mechanism

Insert external reporting alternative here based on the existing legal avenues available in the specific country.

5.4. Appeal Procedures

Insert a detailed organization-specific appeal procedure here.

IAWL'S RECOMMENDATION:

1. The section on appeals may also include grounds or reasons for considering an appeal, such as new evidence, unfair initial procedures, harsh sanctions, etc.
2. Definite timelines should be included in detailing the procedure to ensure speedy delivery of justice.
3. Where necessary and available, actions such as temporarily transferring the complainant or the alleged harasser to separate the two parties from working in the same space until the investigation is completed should be considered as a way of protecting the complainant.

6. Sanctions and Disciplinary Measures

Based on the nature of the offense for which a person is found liable for sexual harassment, any of the following sanctions or disciplinary measures may apply, subject to the conditions in the official communication with the said person:

- a. Verbal or written warning
- b. Apology to the complainant
- c. Adverse performance evaluation
- d. Reduction in wages
- e. Transfer¹
- f. Demotion²
- g. Suspension
- h. Dismissal

¹ Reduction of wages should be excluded from this list where the laws of the country in which a firm/institution/organization is located prohibit the imposition of pecuniary penalties for employee misconduct.

² Transfers (of the alleged harasser or at the request of the complainant) are administrative measures that may be used mainly to protect the complainant from feeling safe in the workplace.

IAWL'S RECOMMENDATION:

The section should explicitly state that:

1. Despite these measures, in deserving cases, the organization/institution will refer the matter to relevant professional disciplinary bodies, regulatory bodies or law enforcement agencies. Such deserving cases include egregious conduct like sexual assault and rape or other criminal conduct that is sexual harassment.
2. Where sexual harassment is prohibited by law, the complainant may in addition to the internal processes, directly file a complaint with any appropriate formal agency authorized to receive such complaints by law.
3. The firm/institution/organization will offer appropriate support to lawful external processes. However, a violation of this policy may exist even when the conduct in question does not violate the law

7. False, Vexatious or Unsubstantiated Complaints

- 7.1. Complaints that are found or assessed to be false or vexatious (made in bad faith and without the complainant's belief in the truth of the allegation) by the sexual harassment/disciplinary committee will be dismissed.
- 7.2. False or vexatious complaints may result in any of the sanctions and disciplinary measures as contained in section 6 above against the complainant.
- 7.3. Complaints that are unsubstantiated (not supported by evidence gathered) will be dismissed.

8. Prevention and Education

- 8.1. This [name of firm/institution/organization] is committed to preventing and educating its employees on sexual harassment in the workplace because the absence of it creates a safe and healthy working environment for all workers and enhances productivity.
- 8.2. For the above reason, the [name of firm/institution/organization] has and will continue to take steps to keep the workplace free from sexual harassment, including instituting this policy and regularly or periodically training and educating all staff.
- 8.3. Workers will be periodically trained and educated on sexual harassment at least once a year, at a time to be decided by the leadership and communicated to all staff.

IAWL'S RECOMMENDATION:

1. The minimum requirement should be an annual training. Training should also be held as and when necessary. For example, when a new set of employees come on board or after a sexual harassment incident occurs or is reported in the workplace.
2. It should be incorporated into the employees' contracts that they must attend and participate in the training.
3. Employees should sign a clause on sexual harassment and related training. This policy should be part of the annexes to the contracts signed.

9. Policy Enforcement

- 9.1. This policy will be implemented and enforced by [insert name of specific body, committee, or individuals].

IAWL'S RECOMMENDATION:

1. This committee should include the officer responsible for managing the finances of the firm/organization/institution, such as the accounts officer or financial manager.
2. The finance officer will provide input on the available resources earmarked for enforcement.

- 9.2. Every supervisor is responsible for ensuring that their team members are fully aware of the policy's contents.
- 9.3. A copy of this policy will be made available on the [name of firm/institution/organization]'s website. Current employees will receive a [soft/hard] copy of the policy immediately after approval. All new employees will also be furnished with a [soft/hard] copy of the policy upon employment.

IAWL'S RECOMMENDATION:

This section should institutionalize and explicitly detail an internal Monitoring and Evaluation (M&E) mechanism.

10. Policy Review

10.1. This policy will be reviewed and updated periodically to reflect best practices and legal changes.

IAWL'S RECOMMENDATION:

To ensure accountability, specific timelines (e.g., annually, biennially, etc.) should be stated instead of "periodically."

10.2. The review process will also be informed by anonymous employee feedback on whether the policy is effective.

10.3. The review process shall be initiated as follows:

IAWL'S RECOMMENDATION:

1. The review process should be outlined here, including who can initiate it, the extent of employees' participation, the approval of updated policy, etc.
2. See appendices for examples to draw from.

GENDER BIASES AND STEREOTYPES



Gender Bias and Stereotypes

WHAT TO THINK ABOUT:

Gender bias and stereotypes are context-specific, so each firm/institution/organization should consider their country-specific contexts in drafting the policy. We recommend defining gender bias and stereotypes with as many examples as possible that fit a country's context. The following may serve as a guide:

1. Definition of Gender Bias

- 1.1. **Gender bias** is the tendency to provide preferential treatment, without lawful justification, toward one gender over another or exhibit prejudice against a certain gender.
- 1.2. **Unconscious gender bias** is defined as the unintentional and automatic mental associations of a person based on gender, stemming from traditions, norms, values, culture and/or experience.

2. Definition of Gender Stereotype and Stereotyping

- 2.1. **A gender stereotype** is a generalized and simplistic view or preconception about attributes or characteristics that are or ought to be possessed by women and men or the roles that are or should be performed by men and women. A gender stereotype is harmful when it limits women's and men's capacity to develop their personal abilities, pursue their professional careers and/or make choices about their lives. Gender stereotypes can be both positive and negative, for example, "women are nurturing" or "women are weak".

MORE ON GENDER STEREOTYPES FROM UN WOMEN:

"Stereotypical characteristics about men are that they are competitive, acquisitive, autonomous, independent, confrontational, concerned about private goods. Parallel stereotypes of women hold that they are cooperative, nurturing, caring, connecting, group-oriented, concerned about public goods. Stereotypes are often used to justify gender discrimination more broadly and can be reflected and reinforced by traditional and modern theories, laws and institutional practices. Messages reinforcing gender stereotypes and the idea that women are inferior come in a variety of "packages" – from songs and advertising to traditional proverbs."

2.2. **Gender stereotyping** is the practice of ascribing to an individual woman or man specific attributes, characteristics, or roles by reason only of her or his membership in the social group of women or men.

3. Protection against gender bias and stereotyping policy statement

[Name of Firm/Organisation/Institution] is committed to protecting against implicit and explicit forms of gender biases and stereotyping in the workplace to establish a fair, equitable, and inclusive work environment for all individuals, irrespective of gender. It intends to use this policy to serve that purpose. The policy applies to all employees of [Name of Firm/Organisation/Institution], regardless of their rank, location, type or duration of their employment, including [a list of other persons within the workplace that may not necessarily be tagged as employees e.g. or who interacts with the firm/organization/institution (including employers, managers, employees, clients, partners, suppliers, contractors, consultants, volunteers, vendors, guests, board members, job applicants, interns, and others who have dealings with institutions/organizations) etc]. This policy applies to all work-related activities both in and outside the office and at all times during and outside regular working hours.

4. Training and Education

To protect against gender bias and stereotyping, [Name of Firm/Organisation/Institution] will regularly/annually train and educate all employees on various conduct that amount to gender bias and stereotyping, including:

- a. Mansplaining or dismissing others' ideas based on their gender
- b. Bias towards being receptive to new ideas/contributions from men than women
- c. Stereotypical jokes about women
- d. Microaggressions towards men
- e. Use of stereotypical language like man up or comments on masculinity
- f. Speaking up against gender-based discrimination in the workplace.

IAWL'S RECOMMENDATION:

1. Training should cover four stages: raising awareness of gender bias and stereotyping, employees managing their own gender bias, employees changing their behavior, and how to track their progress in the workplace and beyond.
2. Other positive steps that firms/organizations/institutions can undertake in addition to training include providing mentors, a buddy system, open forums, counseling, and leadership coaching for staff.

5. Reporting Gender Bias and Stereotypes

For this section, we recommend that each organization/institution/firm identify what works best for them.

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Establish a designated in-house person, committee or body responsible for receiving and handling gender bias and stereotype complaints;
- (b) Lay out the options for reporting allowing for informal, formal and legal processes; and
- (c) Guarantee the complainant's right to confidentiality and protection from reprisal.

2. The policy should not prevent the complainant from electing to use a legal means without first engaging the internal procedures.

3. A complaint form can be designed, which complainants can pick up or download to fill out.

4. Reporting may also be made orally by the complainant. Whatever form reporting takes, it may also be anonymous.

5.1. The Equal Pay Committee/Disciplinary Committee/Office/Person

Here, the details of the institution's designated committee or person to handle cases of gender bias and stereotypes should be provided, including its purpose, membership, appointment procedures, tenure, processes, etc.

The committee's composition should also take into consideration the gender sensitivity of its members and gender representation.

5.2. Avenues for Reporting

A. Informal Reporting Mechanism

An informal reporting mechanism would involve an informal settlement between the complainant and the perpetrator by a neutral third party within or outside the institution at the complainant's request. Informal reporting may also be done orally.

B. Formal Reporting Mechanism

A formal reporting mechanism would involve lodging an official complaint with the designated in-house receiving body or committee to trigger official investigations.

C. External Reporting Mechanism

An external reporting mechanism could be a complaint made to a national labor commission, employment tribunal or other similar statutory body or filed at the courts. This external reporting option to rep external reporting should not also preclude the institution/organization/law firm from conducting its independent investigation and reserves the right to defer.

External reporting should be after exhausting all internal means of remedy or where the case involves criminal aspects

5.3. Confidentiality

All internal disciplinary processes for complaints filed will be kept confidential and will not be revealed to external persons unless the parties involved consent to it or there is a legal reporting obligation to third parties.

5.4. Protection from Reprisal

No hardship, loss, benefit, or penalty will be imposed on an employee in respect of any of the following actions: filing or responding to a bona fide complaint of gender bias or stereotype, appearing as a witness in the investigation of a complaint, or serving as an investigator of a complaint. Employees are protected from any negative consequences for engaging in these protected activities.

6. Investigation Procedures and Mechanisms

IAWL'S RECOMMENDATION:

1. The section should:

- (a) Provide a detailed step-by-step procedure for the various reporting mechanisms listed in section 5 above, and
- (b) Outline internal appeal procedures as appropriate for the firm/institution/organization's context.

2. See appendices for sample policies to draw from to align with the firm/institution/organization's structures.

6.1. Informal Reporting Mechanism

Insert a detailed firm/institution/organization-specific informal reporting procedure here.

6.2. Formal Reporting Mechanism

Insert a step-by-step firm/institution/organization-specific formal reporting procedure here.

6.3. External Reporting Mechanism

Insert external reporting alternative here based on the existing legal avenues available in the specific country.

6.4. Appeal Procedures

Insert a detailed firm/institution/organization-specific appeal procedure here.

IAWL'S RECOMMENDATION:

1. The section on appeals may also include grounds or reasons for considering an appeal, such as new evidence, unfair initial procedures, harsh sanctions, etc.
2. Definite timelines should be included in detailing the procedure to ensure speedy delivery of justice.

7. Policy Enforcement

7.1. This policy will be implemented and enforced by [insert name of specific body, committee, or individuals].

IAWL'S RECOMMENDATION:

This section should institutionalize and explicitly detail an internal Monitoring and Evaluation (M&E) mechanism.

7.2. It is also the responsibility of every supervisor to ensure that their team members are fully aware of the content of the policy.

7.3. A copy of this policy will be made available on the [name of organization/firm]'s website. Current employees will each be given a [soft/hard] copy of the policy immediately after approval. All new employees will also be furnished with a [soft/hard] copy of the policy upon employment.

7.4. Where a person is found liable for engaging in an activity that amounts to gender bias or stereotyping, any of the following sanctions and disciplinary measures may apply subject to the conditions in the official communication with the said person:

- a. Verbal or written warning
- b. Adverse performance evaluation
- c. Reduction in wages⁴
- d. Transfer⁵
- e. Demotion
- f. Suspension
- e. Dismissal

8. Policy Review

8.1. This policy will be reviewed and updated periodically to reflect best practices regarding job duties, qualifications, performance and legal changes.

IAWL'S RECOMMENDATION:

To ensure accountability, specific timelines (e.g., annually, biennially, etc.) should be stated instead of "periodically."

8.2. The review process will also be informed by anonymous employee feedback on whether the policy is effective.

8.3. The review process shall be initiated as follows:

IAWL'S RECOMMENDATION:

1. The review process should be outlined here, including who can initiate it, the extent of employees' participation, the approval of updated policy, etc.
2. See appendices for examples to draw from.

IAWL'S ADDITIONAL RECOMMENDATIONS:

1. The law firm, institution, organization or employer should have a written maternity (and paternity leave) policy in accordance with the existing legislative framework.
2. The policy should also include in its concluding parts an effective date when it was approved, adopted and entered into force. Where there is a review, the date when the review was conducted should also be indicated.
3. Extracts of relevant national and international laws on the four constituents may also be provided as an appendix to the policy

⁴ Reduction of wages should be excluded from this list where the laws of the country in which a firm/institution/organization is located prohibit the imposition of pecuniary penalties for employee misconduct.

⁵ Transfers (of the alleged harasser or at the request of the complainant) are administrative measures that may be used mainly to protect the complainant from feeling safe in the workplace.

Works consulted

1. Amnesty International USA Code of Conduct
2. Institute of Community of Directors Australia Equal Employment Opportunity Policy.
3. International Labour Organization ACT/EMP Research Note, Breaking barriers: Unconscious gender bias in the Workplace
4. International Labour Organization Sample Sexual Harassment Policy.
5. International Labour Organization Violence and Harassment Convention 2019 (C 190).
6. Nigerian Bar Sexual Harassment Policy, 2021.
7. Sonke Gender Justice Sexual Harassment Policy.
8. South African Code of Good Practice on the Handling of Sexual Harassment
9. The Law Society of British Columbia Policy.
10. UNHR Office of the High Commissioner document on gender stereotypes and stereotyping and women's rights.
11. United Nations Women Gender Equality Glossary.
12. United States Equal Employment Opportunity Commission
13. University of Pretoria Anti-Discrimination Policy.
14. World Health Organization Policy on Preventing and Addressing Sexual Misconduct

Additional list of policies ⁶

1. [African Union Policy on Prevention and Response to Sexual Exploitation and Abuse for Peace Support Operations](#)
2. [Amnesty International USA Code of Conduct](#)
3. [Institute of Community of Directors Australia Equal Employment Opportunity Policy](#)
4. [International Bar Association Harassment Policy](#)
5. [International Criminal Court - Addressing Discrimination, Harassment, Including Sexual Harassment, and Abuse of Authority](#)
6. [International Labour Organization ACT/EMP Research Note, Breaking barriers: Unconscious gender bias in the Workplace](#)
7. [International Labour Organization Convention concerning Discrimination in Respect of Employment and Occupation, 1958 \(C111\)](#)
8. [International Labour Organization Equal Remuneration Convention, 1951 \(C100\)](#)
9. [International Labour Organization Sample Sexual Harassment Policy](#)
10. [International Labour Organization Maternity Protection Convention, 2000 \(C183\)](#)
11. [International Labour Organization Workers with Family Responsibilities Convention, 1981 \(No. 156\)](#)
12. [International Labour Organization Violence and Harassment Convention 2019 \(C 190\)](#)
13. [Johannesburg Society of Advocates Harassment policy](#)
14. [Kenyatta University Policy on Sexual and Gender Based Violence](#)
15. [KNUST Anti-Sexual Harassment Policy](#)
16. [KNUST Equality and Diversity Policy 2018](#)
17. [Law and Society Association Anti-Harassment & Anti-Discrimination Policy](#)
18. [Law Society of Kenya Sexual Harassment Policy](#)
19. [Legal Assistance Center Namibia Gender Policy](#)
20. [New York State Sexual Harassment Prevention Model Policy](#)
21. [Nigerian Bar Sexual Harassment Policy, 2021](#)
22. [Pan African Bar Association of South Africa Sexual Harassment Policy](#)
23. [Prevention of Sexual Harassment Policy of the Cape Bar](#)
24. [Sonke Gender Justice Sexual Harassment Policy](#)
25. [The Law Society of British Columbia Policy](#)
26. [The University of Nairobi Sexual Harassment Prevention and Procedure Policy](#)
27. [UNHR Office of the High Commissioner document on gender stereotypes and stereotyping and women's rights.](#)
28. [United Nations Women Gender Equality Glossary](#)
29. [UN System Model Policy on Sexual Harassment](#)
30. [United States Equal Employment Opportunity Commission](#)
31. [University of Cape Town Policy on Sexual Misconduct](#)
32. [University of Ghana Sexual Harassment Policy](#)
33. [University of Pretoria Anti-Discrimination Policy](#)
34. [World Health Organization Policy on Preventing and Addressing Sexual Misconduct](#)

⁶ The list of policies provided here is not exhaustive. They are for informational purposes and should not be construed as IAWL's endorsement.



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