

Diversity Toolkit

How to strengthen diversity integration in the renewable energy sector



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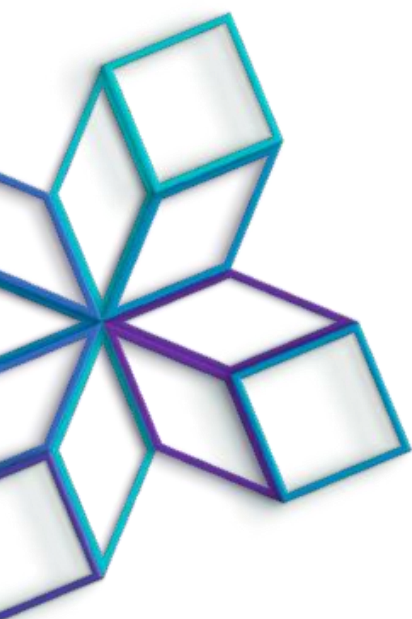
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Diversity is integral to achieving sustainable energy for all. This requires embedding gender and other diversity considerations in energy initiatives' design and implementation stages, which this toolkit is designed to assist with. A Diversity Action Plan at the investee level is required for REPP 2 and TIDES investees.

Citation

Camco and REPP 2 TAF, 2024. Diversity Toolkit.



Introduction

Camco is working to stimulate the development of a vibrant, networked and viable market for small and distributed renewable energy projects. These projects contribute to Sustainable Development Goal (SDG) 7 – ensuring access to affordable, reliable, sustainable and modern energy for all, and SDG 13 – taking urgent action to combat climate change and its impacts.

Diversity is integral to the goal of achieving sustainable energy for all. This requires, in the design and implementation stages of initiatives, that women are actively included in discussions around decisions that affect them, without discrimination. Women in many developing countries are key to energy production and consumption. Across rural communities, in particular, women are primarily responsible for sourcing fuel, paying for it and managing its use.¹ Access to modern energy and appropriate appliances can have a transformative impact on women's lives by reducing drudgery, saving time, improving livelihoods and building community resilience to climate change, extreme weather events and other shocks. A reliable, affordable, safe and clean electricity supply can improve access to information, like health, weather and market data, and technology such as refrigeration, cooling systems and water pumps for remote and rural communities.

Women's capacity to benefit from new economic opportunities from sustainable energy initiatives is often limited. Compromised agency and personal decision-making power, lack of management and technical skills and STEM competencies, lack of access to child-care and risks to their safety and security can present barriers for women's engagement in formal employment, including on projects and sites. Lack of knowledge on how to maintain local energy systems, of energy efficiency and of how to manage electricity use for potential income streams (such as home-based micro-enterprises) can mean lost opportunities for economic self-reliance. Moreover, access to energy services can be hampered by affordability, particularly in rural communities.

Some population groups are more vulnerable to hardship and disasters due to characteristics such as age, gender and sexual identities, ethnicity, race, culture, religion, disability, socio-economic status, geography and/or migration status. Gender equity in the context of energy services development is about increasing opportunities and benefits for both men and women and minimising any adverse impacts from infrastructure developments – taking into consideration realities and differences around needs, constraints, interests and priorities. Gender equity embraces young and old, rural and urban, with and without disabilities, and all ethnic, kinship and socioeconomic groups. This implies that the diversity of different groups is recognised.

There are three main entry points for addressing gender equity in terms of energy infrastructure:

1. **Increasing women's access to electricity.**
2. **Increasing the participation of women in the energy sector workforce.**
3. **Mitigating adverse impacts related to energy infrastructure projects that disproportionately affect women and other vulnerable groups**, such as loss of land, environmental degradation, involuntary resettlement, and sexual exploitation, abuse and harassment (SEAH)...

Achieving diversity is central to more inclusive, prosperous and sustainable communities and to alleviating hardship and economic disparity. Renewable energy companies that incorporate the needs and interests of women into their business plans, can expect to better serve their target energy market as well as improve their own profitability and sustainability. Including women and other marginalised people in energy-system supply chains leads to increased productivity, greater social cohesion, organisational effectiveness, higher returns on investment and consumer satisfaction. Companies with a governing board and/or senior management team that reflects the makeup of their

¹ ENERGIA, World Bank, Energy Sector Management Assistance Program (ESMAP) and UN Women. Accelerating Achievement of SDG7. Policy Brief 12 (2018). Available: <https://sustainabledevelopment.un.org/content/documents/17489PB12.pdf>

consumers demonstrate better environmental, social and governance performance, more ethical business practices, enhanced workplace policies and stronger community relations.²

Projects that are ‘gender-blind’ may perpetuate inequalities and prevent marginalised members of societies from benefitting from sustainable energy. Given that women make or influence 80% of consumer product purchase decisions,³ firms must account for women’s views and experiences to target sales and generate lucrative markets.

This toolkit aims to assist Camco’s investee companies in developing renewable energy projects in line with the following United Nations (UN) goals:⁴

- Women have equal opportunity to lead, participate in and benefit from a just, sustainable and inclusive energy transition.
- Women have equal access to and control over sustainable energy products and services.



² McKinsey & Company. Diversity Matters Even More (2023) Available: <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/diversity-matters-even-more-the-case-for-holistic-impact>

³ European Investment Bank (2024). The Economic Power of Gender Equality. Accessed: <https://www.eib.org/en/stories/gender-equality-power#:~:text=Gender%20equality%20and%20equal%20rights%20are%20not%20just%20a%20matter,developing%20economies%20by%20almost%208%25>

⁴ UN Women and UNIDO, 2023. Gender Equality and the Sustainable Energy Transition

Diversity objectives

All projects supported by Camco-managed funds and platforms must follow Camco’s Environmental and Social Safeguarding Policy. This policy is based on International Finance Cooperation (IFC) Performance Standards on Environmental and Social Sustainability, Sustainability Principles advocated by the UN Global Compact, UN Guiding Principles on Business and Human Rights, International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, International Bill of Human Rights and UN Declaration on Rights of Indigenous People. IFC Performance Standards require projects to:

- Identify and consider the specific circumstances of individuals and groups that may be directly or disproportionately affected by the project because of their disadvantaged or vulnerable status.
- Ensure gender-inclusive consultation, e.g., through focus group discussions, to gain a full picture of stakeholder perspectives, needs, interests and concerns. Experience shows that men and women differ in energy needs and views and may be impacted differently by a development project. A gender-responsive project aims to tackle gender stereotypes and norms that exclude women’s contributions to a project or limit or fail to account for their roles as informants, participants, consumers, product-users and beneficiaries.
- Provide equal employment opportunities and ensure personnel feel safe and are treated fairly with respect to any aspects of the employment relationship, the working environment and the community projects in which they work.
- Protect the physical health, safety and security of project-affected communities, with particular attention paid to vulnerable groups who may be exposed to higher SEAH risks. Ensure also the cultural safety of women involved in projects by understanding the customs and practices that influence and restrict their behaviour and the potential implications of disrupting cultural norms.
- Implement gender-inclusive and confidential grievance mechanisms and other safeguards for stakeholders who are directly and indirectly affected by the project.

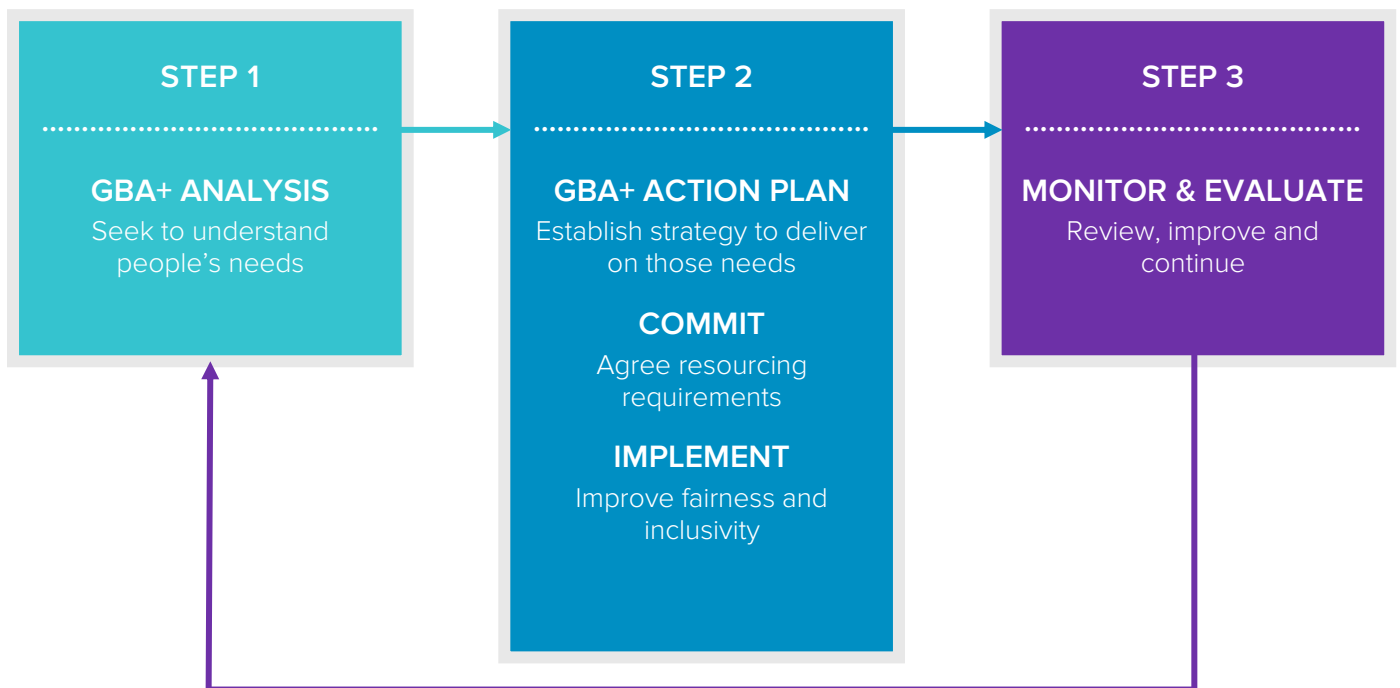


Figure 1: Progress of diversity equality approach

Furthermore, Camco requires investee companies to promote diversity in accordance with its Impact Investment Strategy by:

- Using the Gender-Based Analysis Plus (GBA+) tool to consider and integrate factors such as gender, sex, race, education, economic status, ethnicity, religion, age and disability within their company diversity strategy, country of operation and projects to understand how communities might be affected and if energy access will benefit women and men equally.
- Establishing an investee-specific GBA+ action plan by identifying gender performance indicators and sex disaggregated targets against an established baseline that can be incorporated into a monitoring plan.

Figure 1 provides a graphic representation of the steps that need to be undertaken to complete the GBA+ analysis, GBA+ Action Plan and ongoing monitoring and evaluation. These steps are discussed in detail in this toolkit.



How to use this toolkit

The purpose of this toolkit is to help the investees of Camco-managed funds and platforms, and other renewable energy companies, to integrate a diversity perspective into the design, implementation, monitoring and assessment of their projects.

The toolkit provides guidance for establishing a gender and diversity baseline and diversity (GBA+) action plan for companies and their projects. It also supports companies' understanding of how awareness, specificity, participation, intentionality, implementation, accountability and iteration can impact a business's mission and strategic direction.

Companies can use this toolkit to establish their baseline and action plan by replicating the section headers and thematic fields in a separate document (e.g. Word) and then filling in the fields. In certain circumstances or cases, a gender expert will be required to support and guide the implementation of initiatives.

A guide to symbols used in this toolkit

Descriptive overview



Indicates guidance specific to solar home systems and solar mini-grids projects



Good practice considerations



Indicates where the user's input is required to develop their company's Diversity Strategy and Diversity Action Plan



Tip or further information

Definition of terms

Diversity in the context of this toolkit refers to the varying attributes that individuals possess, such as race, ethnicity, gender, sex, faith, sexual orientation, age and disability.

Diversity analysis is an examination of the status of equality in terms of gender, sex, ethnicity, religion, age and disability in a country, sector, company or project. At a project level, it highlights potentially relevant diversity issues and diversity-sensitive development impact opportunities, typically presented in the form of a baseline. The analysis is also called Gender-Based Analysis Plus (GBA+).

Diversity assessment is based on the results of the GBA+ and describes the issues, gaps and problems that should be addressed by a GBA+ action plan.

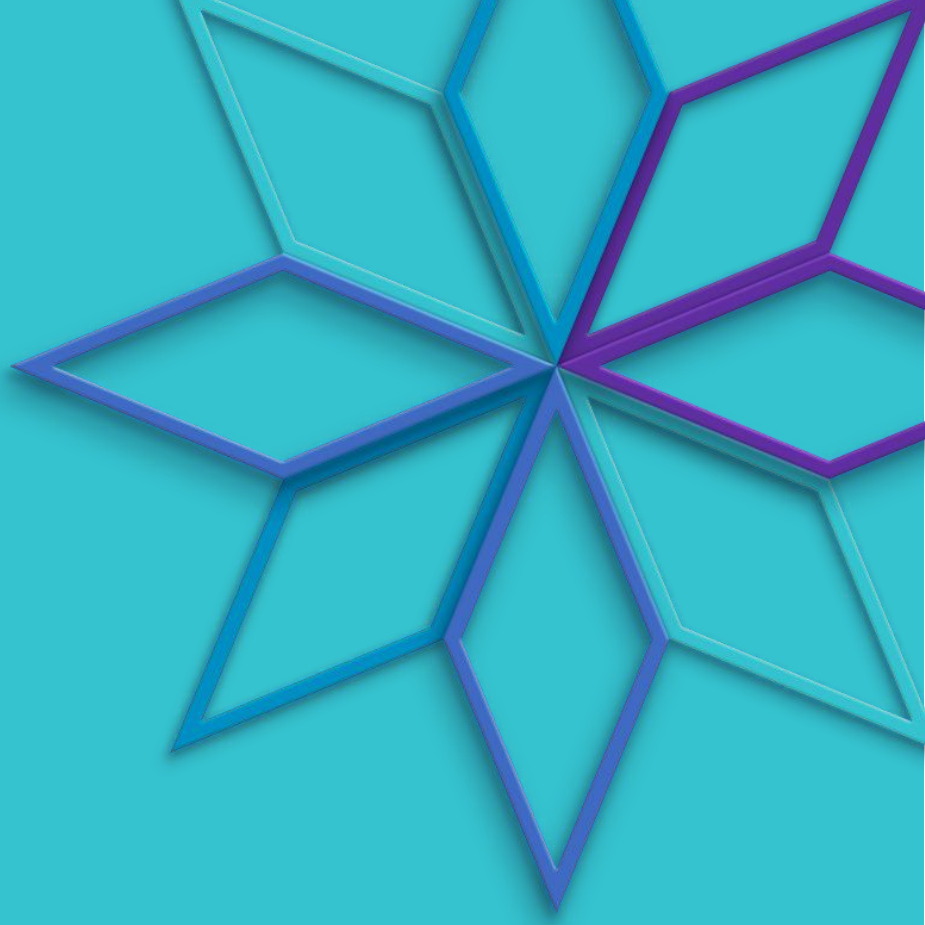
Equality refers to the equal status, rights, responsibilities and opportunities of individuals and groups of people. Equality is seen as a human rights issue and a precondition for, and indicator of, sustainable development. Equality focuses on equal opportunity.

Equity refers to the process of achieving equality and relates to fairness and justice. It often requires differential treatment or specific measures to compensate for historical and contemporaneous social disadvantages that prevent women and other disadvantaged individuals and groups from participating on a level playing field.

Gender refers to the social and cultural differences, roles and expectations accorded to women, men and other gender identities. These roles are learned, can change over time and are influenced by culture, education, class, economic and political environments, the media, crises and conflicts.

Minority is a culturally, ethnically or racially distinct group that coexists with, but is subordinate to, a more dominant group. Subordinacy is the key defining characteristic of a minority group. As such, minority status does not necessarily correlate to size of population.

Vulnerable people and groups are people who are at higher risk of harm and exploitation due to several factors, and are defined by the UN as 1) women 2) children 3) refugees 4) internally displaced persons 5) stateless persons 6) national minorities 7) Indigenous peoples 8) migrant workers 9) disabled persons 10) elderly persons 11) HIV positive persons, AIDS victims and victims of other contractable threatening diseases 12) Roma/Sinti 13) any individual based on ethnicity, beliefs, identify, gender or sexual orientation and 14) any individual living in extreme poverty who lacks access to basic services, opportunities to participate fully in the socio-economic life of the community, productive resources to ensure sustainable livelihoods and participation in decision-making. A person's vulnerability should be defined, within reason, taking into consideration the project context, host country regulations and their specific circumstances.



Step 1. Diversity analysis (GBA+)

Diversity analysis helps to identify gender, racial, ethnic, age and religion-based inequalities and gaps in relation to a project and/or investee company, as well as specific initiatives needed to empower women, better understand and identify the implications of systemic issues, and remove barriers to equality.

A GBA+ analysis informs a project design and is undertaken in parallel with the establishment of an Environmental and Social Management System (ESMS). At a high level, this analysis should assist the project developer to understand its stakeholders, be aware of the risks and considerations in working with each of the stakeholder groups and support it to frame interventions to address inequalities.

Specifically, the analysis should:

- Identify the dimensions of diversity within a specific community, other than sex and age, that need to be accounted for (e.g., tribal affiliation, level of education, religion, language, disability, informal settlements etc).
- Gather secondary data on these groups from sources such as diversity, equity and inclusion (DEI) advocates, women's organisations, and local and national authorities.
- Gather primary data through an initial community consultation and regular engagement with community representatives that reflect their communities' diversity.
- Assess the root causes, structural barriers and inequalities that put underrepresented groups at a disadvantage.
- Identify and examine diversity-specific risks relevant to the project and investee company.

Investees should report the findings of project- and investee-specific analyses internally, as well as to Camco and other relevant external stakeholders.

1.1. Diversity analysis at the project level

The following questions are designed to help investee companies and project developers to identify and analyse diversity-specific project risks and intended outcomes of the project in affected communities. Use the answers to help consider, discover and describe issues, gaps and problems relating to inequity as well as possible opportunities to ultimately enhance diversity and promote socioeconomic benefits through the project.

Diversity analysis should form part of the Environmental and Social Impact Assessment (ESIA) to influence project design and the environmental and social management framework and, where relevant, be part of marketing analysis and the customer interaction process.

What are the context considerations to be included in the baseline?

- What demographic data is available regarding the make-up of the project community in terms of gender, age, ethnicity, race, religion and disability? (E.g., life expectancy, literacy, child mortality, percentage of female-headed households, poverty level, access to electricity, sectoral employment, access to finance.)
- What are the main sources of livelihood and income for women and men?
- Who in the community has access to electricity?
- Are there groups that are limited in, or restricted from, accessing energy? (E.g., purchasing power of men vs women, legal restrictions related to gender or age, accessibility issues for disabled.)
- How is electricity used differently by gender, age, disability and socioeconomic status?

- What are the possible or likely impacts of the project, negative or positive, on men, women, minorities and vulnerable groups? How are they different?
- How can the product or service better serve women and other marginalised groups and contribute to their livelihood development?
- Is there a difference in the ability to afford the service/product between male- and female-headed households or households of minorities in the project community? If yes, what is the reason?
- What are the beliefs, values, norms, and stereotypes related to gender and diversity in the affected communities?
- Could gender relations (i.e. the interactions, rights and responsibilities of men and women in relation to one another) have an impact on the effectiveness and sustainability of the project, activity or result?
- What broad inequalities and discriminations exist within the context of the project?
- What are the potential SEAH risks that have been identified in the country context to be interpreted, scaled and applied to the project community?
- Are there safety issues in public places to consider? If so, what are they?



Record your observations and data collected from the above considerations in a separate Diversity Baseline and Action Plan document. Refer back to the document in identifying key risks and opportunities for the project throughout its life-cycle and as the gender analysis develops fully into a strategy.

Who has what?

- What are the levels of income and wages for women, men and people from minorities or vulnerable backgrounds?
- What are the levels of educational attainment for girls and boys, and people from minorities or vulnerable backgrounds?
- Describe the situation regarding land tenure and resource use. Who controls access to or owns the land? Are there any inherited land parcels and how was ownership treated?
- Do women have rights to land, and other productive resources and assets?
- What proportion of men and women have bank accounts? Have they received loans/credit?
- What proportion of men and women have mobile phones, access to radio, newspapers, TV?
- Do women and men have access to extension services, training programmes, etc. in relation to upskilling and economic development?
- What is the current user knowledge? Do men and women have equal prior knowledge of renewable energy?



Record your observations and data collected in the Diversity Baseline and Action Plan document, including identified risks and opportunities for the project.

Who does what?

- What is the division of labour between men and women, young and old, in daily life and how could this affect these groups' involvement in the project?
- Who manages the household and takes care of children and/or the elderly?
- How much time do women and girls spend on domestic and care work tasks compared with men and boys?
- How do men and women and people from minorities or vulnerable backgrounds participate in the formal and informal social -economy within the community?



Record your observations and data collected in the Diversity Baseline and Action Plan document, including identified risks and opportunities for the project.

Who decides?

- Who controls, manages and makes decisions about household resources, assets and finances? If the household is headed by a woman, what are the main drivers for income?
- Do women have a share in household decision-making?
- Who controls the main areas of household spending?
- How are men/women, people from minorities or vulnerable backgrounds involved in community decision-making? Are local leaders supportive of women's rights? Is women's representation evident in community discussions or decisions?
- Are there women's associations and/or DEI advocates active in the area that would support consultation processes and dialogue with different members of communities?
- Are there youth associations active within the community?
- Is there access to information (HIV, AIDS, health concerns, STDs, protection, SEAH, and Gender-Based Violence and Harassment (GBVH) support, etc.)? What methods are used to access information and are these methods available to men, women people from minorities or vulnerable backgrounds equally?
- Are there organisations/associations/NGOs available to provide GBVH survivor support?



Record your observations and data collected in the Diversity Baseline and Action Plan document, including identified risks and opportunities for the project.

Who benefits?

- Does the project directly respond to needs expressed by local people in the area of intervention?
- Is the project likely to benefit only a particular category of people, e.g., urban dwellers, men working in certain sectors or schoolchildren? Where are the beneficiaries located? For example, are they in close proximity to the project site, or do they frequently travel along the main access routes to the project?

- Are the needs and priorities of men and women in the area of intervention different?
- How will the proposed results (services/products) benefit diverse groups? Could the project benefit everyone in the area of intervention?
- Will the project exacerbate or reduce inequalities? If yes, how?
- Will female- and male-headed households have equal ability of affording the service/product? If not, how can this be better enabled?
- Will the proposed interventions cause an increase/decrease in women's (and men's) workloads? If yes, how?
- How will the proposed interventions increase or stimulate the incomes of men, women and people from minorities or vulnerable backgrounds respectively?
- Do the products/services offered cater equally for the needs of men, women and people from minorities or vulnerable backgrounds?



Record your observations and data collected in the Diversity Baseline and Action Plan document, including identified risks and opportunities for the project.

Off-grid considerations



In the off-grid renewable energy sector, understanding customers and their energy needs, including productive uses of energy, is important for successful project implementation. A deeper understanding of the female customer segment and vulnerable communities can help a company increase its customer base and market size.

Areas to consider collecting data on include:

- Who has access to energy technologies and services?
- Do men and women have equal access to energy? If not, what areas need to be improved to ensure equal access?
- What kind of businesses are men versus women involved in at the project sites you have worked?
- What is the role of women in key sectors and value-chains (e.g. agribusiness) and in the household?
- Are there gender or other diversity-related differences in affordability constraints and ability to pay (e.g., seasonal income with crop harvests, etc.)? Could rental options or more frequently occurring smaller payments help with affordability?
- What changes could be made around the requirement to gain access to energy services (e.g. the upfront connection fee/down payment, subsidised connection points, price point and timeline for payment for connection)?
- Are different approaches and channels needed to understand and target women and men in, for example, market assessments, marketing, information campaigns, retail, or customer feedback? Are feedback systems in place available for both men and women? Are feedback systems available throughout the day? Are feedback systems conducted in both informal and formal ways, including toll free options?



Record your observations and data collected in the Diversity Baseline and Action Plan document, including identified risks and opportunities for the project.

End-user knowledge considerations

It is important that end-users have at least a basic knowledge of a proposed product or service to ensure the safe, functional and efficient use of that product or service.

Key considerations include:

- Staffing and budgeting for understanding customers (i.e. gathering demographic data to support market strategy).
- Who to engage with (e.g., female farmers, business owners/partners, significant others, service providers, local officials and various other types of partners).
- How to engage (e.g., stakeholder analyses, household interviews, community mapping and discussion groups).
- What to engage on (e.g., energy needs and value chains, willingness to pay, access to finance).
- When and where to engage, factoring in availability, location, partner consent, seasons etc.
- Current energy needs (to do tasks and reduce manual labour or costs) and future energy aspirations
- Access to information and business development opportunities.
- Level of existing knowledge on safe and efficient electricity use?
- Whether there are training programmes in place to consider growing community economic development.



Record your observations and data collected in the Diversity Baseline and Action Plan document, including identified risks and opportunities for the project.

1.1.1. Inclusive stakeholder consultations



Good practice considerations:

Inclusive stakeholder consultations are essential for understanding all stakeholder perspectives and provide companies with a more complete picture of the potential risks, impacts and opportunities relating to their projects. Local customs and gender norms may suppress the voices of women, youth, minorities and vulnerable people.

If companies are unable to consult with women and other communities of interest directly, they can work with local agencies such as women's organisations, churches and community service organisations (CSOs) who can help them navigate the culture barriers to communication and enhance outreach in off-grid projects.

See [Figure 2](#) for other good practice principles.

Inclusive consultations can be promoted by:

- **Facilitating separate workshops or focus groups within a single workshop for different stakeholders** (e.g., women, girls, youth and elderly) that draw out the issues specific to each group. This technique may reduce any discomfort about speaking out about sensitive issues in front of elders or other genders. Note that mixed gender and diverse groups can work well in some communities or regions. If facilitated respectfully, they can reduce polarisation of beliefs or opinions, leading to improved communication and understanding between different groups.

- **Disaggregating data by gender and age** to better understand gender differences related to the project. Using vignettes, stories and photos to communicate women’s experiences, rather than relying strictly on data.
- **In village-based surveys**, identifying households as to whether they are female- or male-headed and interviewing representative samples to gather the views of women and other vulnerable groups relating to project issues.
- **Active participation of women and people from minorities** in running surveys and community liaisons to encourage female participants to express their views and concerns.
- **Ensuring gender awareness and DEI considerations of the team/company** so that everyone appreciates the benefits of understanding the views of both men and women.
- **Enhancing women’s participation** by: planning consultation events at times, days and locations that are convenient for women; considering childcare support; and providing transportation to and from the meeting venue. Further factors such as illiteracy and education level should be considered when selecting suitable facilitation methods. Have a plan for communicating the importance of gender issues that addresses different target audiences with appropriate messages and formats, considering here differing levels of literacy, language and access to media.
- **Advising and seeking the support of village and church leaders** in organising consultation events and encouraging female attendance. Without this endorsement, women may not be permitted to attend.
- **Recognising that women and people from minorities and vulnerable backgrounds are not homogeneous groups**, and as such provide adequate attention to ensure the representation of different perspectives across socioeconomic, ethnic and religious lines. Marital status, cultural status and age may be important factors.
- **Demonstrate integrity in managing sensitive information and following up on commitments.**

Note: Remember to keep minutes and other relevant documentation of stakeholder meetings and distribute them to participants after the meeting. In the case of formal meetings, minutes should be agreed and signed by the relevant stakeholders.

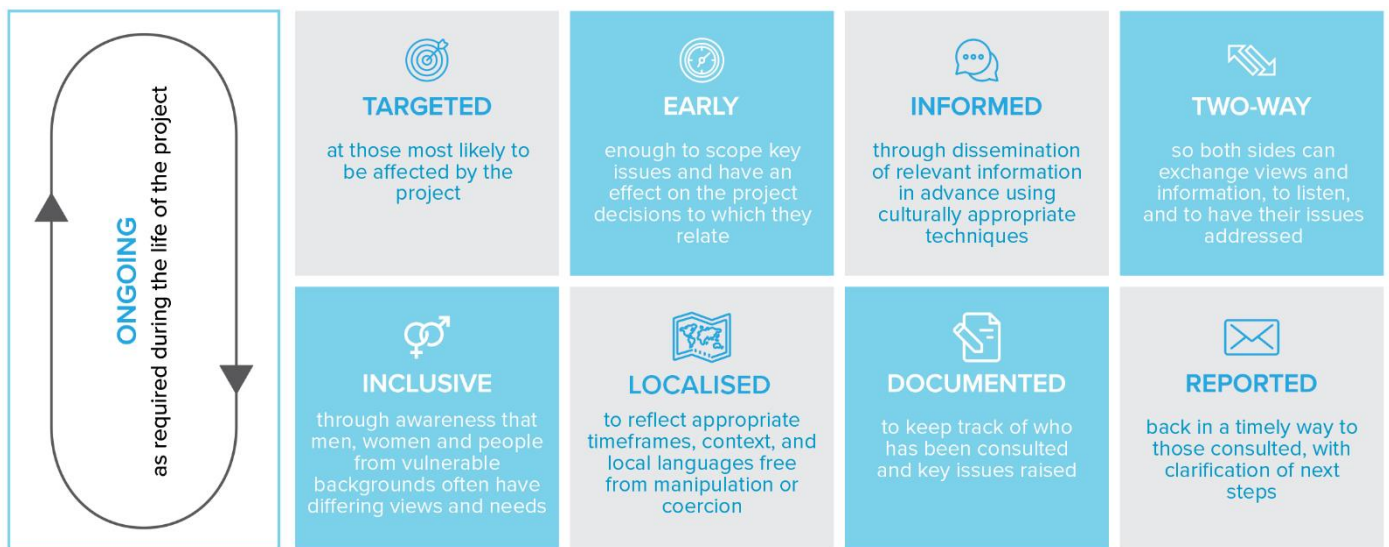


Figure 2: Basic principles of good practice for stakeholder consultation (adapted from: IFC 2007)



Describe how you conducted and will continue to conduct your gender-sensitive stakeholder consultation in the project-level Stakeholder Engagement Plan document.

1.1.2. Diversity considerations in land acquisition

Key issues for women relating to land are demonstrated below:

- Women have little control over or benefit from income generated from cash crops, despite them providing significant labour and, in matrilineal societies, owning the land on which they are cultivated.
- In some countries, bride price was once seen as a cultural custom symbolising reciprocity between families and providing support for the newlyweds. Today, however, it has increasingly become viewed as a property transaction that formalises a man's authority over a woman, as well as practices and differences in access to education, household responsibilities and gender pay gaps. This places women at a considerable socioeconomic disadvantage in their capacity to procure land.
- In some countries, women traditionally had a prominent role with respect to land decision-making. However, changes in social norms and the royalties from natural resource exploitation have led to men taking over decision-making roles with regards to land,⁵ in line with their dominance in other visible leadership and decision-making roles in households, communities, party politics, government and the private sector.



Good practice considerations:

The rights of women and minorities regarding landownership and management vary based on factors such as the cultural and historical context of the region and their marital status. Lack of information can lead to projects that limit or reduce economic and social opportunities.

The points below offer some considerations for good practice. They should not be considered as all-encompassing guidance and are not intended as a substitute for specialist guidance.

- All land transactions – whether to lease, purchase, transect or use - should be carried out formally using specialised legal service providers to negotiate the process. They will ensure that negotiations take place with the correct parties, that legal documents are filed and that all parties understand the terms and conditions. They will also provide guidance on cultural matters and help identify if any miscommunication or disagreements have occurred.
- Undertake inclusive community engagement to ascertain the impacts of other user groups on the land or those living nearby to agree terms and avoid disputes.
- Allow for separate, meaningful stakeholder engagement with women and other groups. Carry out consultation sessions, free of intimidation and conducted in the local language, to create a conducive and unbiased environment.
- Use local expertise in project communication and community training. Regional NGOs, local government and universities often have local-level resources and an understanding of local cultures and traditions.
- Provide training to project staff on the terms and conditions of leases and land access agreements. Ensure community leaders and project beneficiaries have the relevant information about the formal and informal laws during the land acquisition process.
- When scheduling meetings and other consultation activities, give careful consideration to people's work and domestic duties to maximise potential attendance, as part of the social and cultural analysis, evaluation and stakeholder engagement dedicated to land acquisition and or resettlement.

⁵ Maetala, R. (2008), 'Matrilineal Land Tenure Systems in Solomon Islands: The cases of Guadalcanal, Makira and Isabel Provinces.' In Land and Women: the Matrilineal Factor: the cases of the Republic of Marshall Islands, Solomon Islands and Vanuatu, edited by Mark Garrett, pp.35-72. Pacific Islands Forum Secretariat, Suva.

- Offer flexibility where people are not able to provide required documentation. Identity cards, for example, can be difficult to obtain for women or other minorities, especially in rural areas.
- Assist women in establishing community organisations or seeking support from established organisations focused on women's and girls' needs and interests (e.g., access to microcredit, education and training, or development of industries desired by women).
- Identify legal entities to collaborate in formally transferring and acquiring land titles, as well as estimated timelines in obtaining the necessary entitlements and structured compensation payments to affected people.
- As far as possible, disputes should be avoided. However, in the event a dispute does occur, try to resolve issues formally and locally by using local agents. Consider how women may have rights under formal law for dispute resolution, but either do not have the knowledge or the financial means to pursue their rights through the courts.
- Respect local culture, custom and religion and keep in mind regional differences.

Furthermore, it should be noted that traditional local customs may deny women or minorities people access to land tenure. Therefore, involving local organisations familiar with traditional land acquisition is of crucial importance.

The specific content of the formal and informal land law training targeted at the community, referred to above, will vary depending on the project and its location. All the following points, however, should be considered in training **women and men**:

- Formal legal rights of women and minorities around land acquisition and transfer, including inheritance and divorce.
- Problems encountered with formalising and progressing the land transfer or acquisition (for example, formal land title documentation or access to credit).
- The legitimate involvement of women and men in the adjudication process and in registration of rights (e.g., denying a women's right to participate in the adjudication process due to their status as homemakers in the community, therefore determining their experiences are irrelevant to the public discourse).
- Benefits of participation in the training, to ensure awareness is raised in a person's right to own/use land and the boundary of exercising these rights.

1.1.3. Inclusive Grievance Redress Mechanism



Good practice considerations:

Increased global commitments to gender equality and diversity have led to the growing recognition that targeted investments to address gender-based violence are needed and that there is the potential to leverage global public and private finance and investment systems to reduce and eliminate gender-based violence and SEAH.

Establishing a Grievance Redress Mechanism (GRM) as part of continuous stakeholder engagement helps build a strong relationship between a company and its employees, contractors and the project-affected community. By investigating and mitigating grievances through the GRM, the company is able to protect the community, its employees and contractors as well as rectify illegal practices (such as forced and child labour practices, minimum wage limits, working hours etc.) and maintain labour codes to that of an international standard. There are employment assistance programmes available in some regions, which assist in addressing gaps in applying international best practice labour codes and rectifying illegal practices.

THE GRIEVANCE REDRESS MECHANISM SHOULD BE DESIGNED SO THAT IT IS: ⁶
LEGITIMATE and trusted, and encourages dialogue and shared responsibility for outcomes
SCALED to the risks and potential adverse impacts of the project
PUBLICISED and ACCESSIBLE , appropriately tailored to all potentially affected persons and communities and other interested parties, irrespective of their literacy and administrative capacity
FREE of cost for the stakeholders
includes an ANONYMITY option, where feasible, and guarantees confidential handling of requests, if so requested by the complainant. Examples of this can be in the form of a box by the project office or community centre, or a dedicated call line
fair, TRANSPARENT and inclusive about the process and outcomes
RIGHTS-COMPATIBLE , meaning outcomes align with internationally recognised human rights practices
ADAPTIVE to the stakeholder's preferred communications channel and to accommodate improvements in the mechanism to suit the needs of stakeholders
guided and supported by engagement and DIALOGUE
a PREDICTABLE , defined process that includes assignment of responsibility, time limits and monitoring of outcomes, and
TIMELY , resolving concerns promptly. An example of this is having an easy-access online portal, complaint box or call centre whereby employees and community members can speak with the project's liaison officer or communications officer to lodge an anonymous concern or complaint. The method of how to lodge a complaint or concern should be publicised during the stakeholder engagement process. The Grievance Redress Mechanism must provide a step-by-step process on how each grievance is addressed in a transparent and impartial way.

Please refer to Section 1.7.5 of the ESMS Toolkit for a step-by-step process for establishing a project-specific GRM for affected communities.

GRM policy and process considerations

- Has your company invested in a mechanism (toll-free) for grievance submissions, claims or suggestions from community members, employees (including part-time and probationary), service providers, suppliers and sub-contractors? Can the grievance or concern be submitted in a confidential manner?
- Has your company elected a trusted person responsible for receiving grievances or concerns from the public or from within the company? Are the contact details and methods of how to contact this person continuously publicised in all communications?
- Is the company-elected GRM personnel trained in safeguarding, SEAH and GBVH survivor support, conflict resolution, location-specific cultural customs and how to effectively build a sense of safety with the aggrieved?

⁶ EIB's Environmental and Social Handbook. Standard No. 10 (2018)

- Has your company outlined the prescriptive process in which a grievance or concern will be investigated and how the corrective action and/or resolution will be communicated with the complainant in a confidential or transparent manner?
- Does the GRM outline an avenue to report a human rights violation anonymously and without fear of reproachment?
- Does the GRM outline the zero tolerance actions resulting in retrenchment and avenues of disciplinary action for continued egregious behaviour?
- Does your company have a leadership commitment and support for the PSEAH Policy and Code of Conduct?
- Are SEAH risks built into capacity building efforts? Is this publicised to all project-affected individuals?
- Has your company established partnerships with local agencies that can provide support (mental, medical, legal, physical and psychological) to gender-based violence victims?



Summarise your company's approach to developing a project-level Grievance Redress Mechanism in your ESMS documentation, specifying any relevant issues, gaps and problems in a separate document. The corrective actions and training requirements to address these issues should be developed within the project.

1.1.4. Gender-based violence prevention

What is GBVH?

Gender-based violence and harassment (GBVH) encompasses any harmful act directed at an individual due to their socially assigned gender. This includes actions that cause physical, sexual or mental harm, as well as threats, coercion and restrictions on freedom. GBVH can happen in both public and private settings. Common examples include sexual violence (such as rape, attempted rape, unwanted touching, sexual exploitation and harassment), intimate partner violence (often referred to as domestic violence, which includes physical, emotional, sexual and economic abuse), forced and early marriage, and female genital mutilation.

Considerations for preventing Gender-based violence

- Has a SEAH risk assessment been conducted?
- Has a gender-based violence and harassment (GBVH) risk assessment been completed as part of the ESIA to understand the dynamics of the community affected by the project?
- Have the mitigative measures and awareness raising efforts been integrated as far as possible into the GRM, Stakeholder Engagement Plan (SEP), Labour Policy, Environmental and Social Policy, Code of Conduct, Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy and associated training practices?
- Does the company's Code of Conduct define the appropriate behaviour in any situation associated with the project?
- Does the Code of Conduct identify all consequences of any breaches?

- Has the company trained and publicised the PSEAH Policy and Code of Conduct upon induction of an employee (probationary, part-time, intern, full-time or casual labourer), contracted service provider or contracted supplier?
- Is training conducted on all employees of the PSEAH Policy, Code of Conduct, Labour Policy and zero tolerance behaviours?



Figure 3: GVBH risk management



Summarise your company's approach to developing a project-level Stakeholder Engagement Plan and Grievance Redress Mechanism, with deliberate support for GBVH issues, gaps in support and problems in holistically addressing the gaps in a separate document. The corrective actions and training requirements to address these gaps should be developed for the project, integrating the role and responsibility of the CLO, HSE Manager and other experts/support organisations necessary.

1.2. Diversity analysis at the company level

The following questions are designed to assist with carrying out a diversity analysis at the company level, and to identify and analyse specific risks. The answers should be used to help describe the issues, gaps and problems identified.

In addition to the questions below, companies are advised to make use of the:

- [UN's Gender Gap Analysis Tool](#) and
- [International Center for Research on Women's off-grid energy gender scoring tool](#), workshops and (anonymous) questionnaires, which provide useful ways to gather and record data.

On completion of the analysis, present the key concepts and learnings to all employees.

Policy framework areas to review

- Does your company have leadership commitment and support for equality and the empowerment of women and individuals from previously disadvantaged backgrounds?
- Does your company have an explicit non-discrimination and equal opportunity policy, either stand-alone or clearly included in a broader corporate policy?
- Is zero tolerance on SEAH embedded in your company's Code of Conduct and are necessary safeguarding policies and procedures in place for your employees?
- Does an explicit care leave policy, e.g., paid maternity leave, exist?
- How are these aspects embedded in the legal agreements with suppliers and contractors?
- Does your company consider supply and procurement policies that could contribute towards supporting underrepresented businesses (both local and national)?



Summarise your company's approach to developing a diversity policy in your corporate documentation, specifying any issues, gaps and problems in the Diversity Baseline and Action Plan document.

Identify existing gender capacity

- Has a diversity representative been appointed within your company? Consider who should own this role, which is often embedded in a senior HR function.
- Has training/capacity-building needs of staff and stakeholders been considered/taken place?
- Does your company have policies and processes in place to ensure responsibility for respecting the rights of women, girls and minorities and vulnerable groups in the local communities in which it operates?
- Does your company take proactive procurement steps to expand relationships with women/minority-owned businesses in the value chain and when contracting vendors?
- Does your company encourage suppliers and vendors to advance performance on equality?
- Does your company have an approach to assess differential impacts on women and men when developing products and/or services?



Summarise your company's existing gender capacity in your corporate documentation, specifying any issues, gaps and problems in the Diversity Baseline and Action Plan document.

Diversity-conscious workplace considerations

Does your company:

- Have an approach to ensure non-discrimination and equal opportunity in recruitment processes?
- Have an approach to ensure equal pay for equal work once an individual is contracted?
- Have an approach to ensure non-discrimination and equal opportunity in professional development and promotion processes?
- Offer and support paid maternity leave?
- Offer and support paid paternity leave? Is the extent of paternity leave the same as maternity leave? Providing equal parental leave assists with equal caregiving and helps mothers to return to work after childbirth.
- Have an approach to support employees as parents and caregivers? E.g. flexible working arrangements.
- Have an approach to accommodate the work/life balance of all employees?
- Have an approach to ensure an environment free of violence, harassment and sexual exploitation?
- Have an approach to address the specific health, safety and hygiene needs of women at work and while commuting to work? This also applies to female sales agents in the field and construction labour.
- Have you considered any missed gender-related market opportunities for productive use?
- Have you built a more inclusive culture by offering training on anti-bias, anti-racism and conflict management as well as how to address everyday microaggressions?
- Have an approach to promoting access to quality health services that meet the specific health needs of women employees, as well as employees with diverse gender identities?
- Have a feedback system in place? Is it equally available for both men and women?



Summarise how diversity-conscious the workplace is at your company in your corporate documentation, specifying any issues, gaps and problems in the Diversity Baseline and Action Plan document.

Gender and racial balance of staff

- Does your company have gender and racial balance at different levels (entry, manager, director)? If not, do you have a strategy to achieve that?
- Does your company have a mentorship or engage with training programmes to encourage lower-level staff into management positions to develop a more gender equitable structure?
- Does your company have gender and racial balance across the rest of the company? If not, what are the barriers to encouraging women into male-dominated roles, or hindering people from previously disadvantaged backgrounds progressing?
- Are there opportunities in collaborating with universities and other organisations or associations to encourage and facilitate the recruitment of women?

- How could the use of language and imagery be better tailored to being more supportive of women and hindering people from previously disadvantaged backgrounds in job advertisements and marketed company profiles?



Summarise the diversity balance of staff at your company in your corporate documentation, specifying any issues, gaps and problems in the Diversity Baseline and Action Plan document.

Payment gap

- Does your company have a transparent pay range scale to ensure women and men and people from diverse backgrounds are compensated fairly?
- A diversity pay gap analysis should be completed to ensure a baseline is set. Analysis should understand the **raw gap** based on gender (e.g., average female salary vs average male salary).
- The gap analysis should be done based on position level (e.g., compare like for like positions (entry, manager, director) between men and women as well as race and ethnicity).
- The **gap by age group** should also be established (categorise employees by age and compare difference by gender and race).
- A **gap analysis based** on education level and experience is highly recommended as well.
- If your company has operations in several different countries/regions, an adjusted pay gap analysis can be added to mirror the cost of living based on consumer basket index.
- The pay gap analysis must include all **aspects of pay**, including but not limited salaries, bonuses, medical or retirement benefits and individual allowances (e.g., phone, internet).
- Readjustment and additional pay gap actions should be included in the **gender action plan**.



Pay gap analysis

The payment gap between foreign and local labour can vary depending on the host country or region, often due to the need for additional capacity or expertise. While this is broadly accepted, the investee is encouraged to produce salary ranges for all positions based on skills, education, experience and comparable market rates in the payment gap analysis. The salary ranges should be transparent to staff members, however, with the caveat that individual variances will be applied that are influenced by external factors.



Summarise the payment gap situation at your company in your corporate documentation, specifying any issues and problems in a separate document.

Education and continuing professional development

- How can your company increase girls' and women's exposure to the energy sector (e.g., internships, training, recruiting)?
- What opportunities exist for women and people from previously disadvantaged backgrounds in terms of mentoring and connection to role-models?
- Does your company have standardised job performance reviews and skills assessments?
- Do you offer effective career progression training to women?



Professional development

In some regions, such as the Pacific islands, the need for skilled capacity in job roles is significant due to migration flows and seasonal work. It is therefore encouraged that in-house mentorship to attract recruits and facilitate movement of interns into higher positions within the company is enhanced or incentivised. Incentives can be in form of benefits, subsidies, flexible work schedules or leave allowances, working environments and additional access to recreational facilities, job security, professional development or training opportunities, etc.



Summarise the education and continuing professional development situation at your company in your corporate documentation, specifying any issues and problems in a separate document.

Creating inclusivity within the workplace culture

To ensure staff satisfaction, annual anonymous staff surveys are recommended. The following questions can help map out feelings of equality and inclusion and to establish actions based on the responses.

- Can you be your authentic self in your organisation?
- Have you ever felt left out or discriminated at work?
- Have you ever felt emotionally or physically unsafe?
- What makes you feel like you belong at the organisation?
- Do you feel women are empowered and encouraged to be mentored to progress to higher levels at the organisation?
- In your view, do you feel the organisation provides an improved quality of life?
- In your experience, what are some barriers people don't see but impact your ability to participate in the organisation?
- In your experience, are promotion decisions fair at the company?
- Is a career development path and training provided quality to all employees at the company?
- In your opinion, what are some of the ways the organisation could be more inclusive?
- How can your peers, managers, leaders and other partners at the organisation be more inclusive?

The results of surveys should be discussed with or presented to employees together with the actions identified to improve the status quo.



Summarise the workplace culture considerations specific to your company in your corporate documentation, specifying any key issues to be incorporated in the Employee Handbook document.

1.2.1. Inclusive Grievance Redress Mechanism

The company-level Grievance Redress Mechanism (GRM) should be suitable for providing an in-depth investigation into labour concerns, code of conduct breaches, supplier and third-party service provider management, SEAH/GBVH in and amongst teams, mismanagement and miscommunication, and conflict of cultural perspectives in a professional setting. Mediation in these matters needs to be respectful but also align with the operational integrity and working conditions of the business environment. As such, key structures within the GRM, such as confidentiality, communication and timing of the investigative processes, need to be defined and strictly adhered to.

The GRM should be developed on the following principles:

- **Transparency and fairness:** Easy to understand, transparent and available at no cost to the aggrieved.
- **Confidential disclosure:** Every effort is made to ensure the investigation is carried out in a confidential manner, should this be requested.
- **Accessibility and cultural appropriateness:** Access to the GRM is provided via an independent service provider, with the inclusion of a whistleblowing hotline that enables anonymous reporting.
- **Recording:** All grievances are registered on a grievance form, logged and monitored through to resolution and close out.
- **Dialogue and site visits:** All grievances warrant discussions with the complainant and a site visit may be recommended where relevant to gain a first-hand understanding of the nature, validity and severity of the grievance.
- **Timely resolution:** An initial response to all grievances received is usually within 14 working days, with a full response including a plan of action to address the grievance within 20 working days.

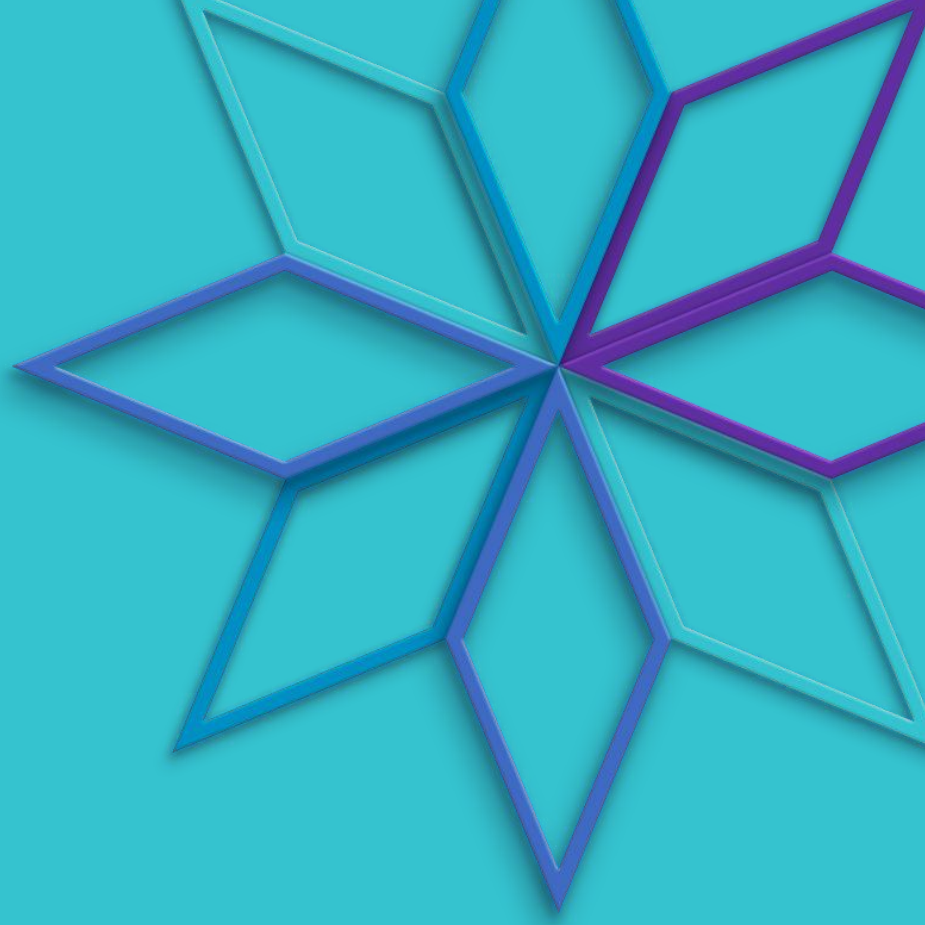
1.2.2. Gender-based violence and harassment prevention

Gender-based violence and harassment (GBHV) prevention at the company level needs to cultivate a sense of security and supportive organisational culture which is integrated by:

- Identifying and rewarding workforce members that try to address GBHV and influence good practices amongst other members of the team, such as company reward schemes or company-wide recognition.
- Including GBHV awareness-raising into the role and responsibility of a key member within senior management.
- Tracking progress and improvement by including explicit communication and reporting on GBHV efforts completed within the company as part of annual reporting commitments, as well as establishing a board-level committee to provide oversight on GBHV.
- Emphasising the company's support for seeking justice in crimes of GBHV acts.



Summarise the incentives or unifying strategies in your company's Diversity Strategy and Diversity Action Plan.



Step 2. Diversity Action Plan

Companies need to establish a Diversity Action Plan to overcome the constraints and negative impacts identified during the analysis, as well as maximise the benefits and opportunities identified. The plan should establish ambitious but realistic and measurable targets.

Equity considerations must be made an integral part of the project and business across all stages with actions cross-cutting all project areas. Diversity actions are the responsibility of all staff – not only women or minorities.

This means all staff, including international advisors to the project and senior management, should be involved in the planning, implementation and evaluation of the Diversity Action Plan and have the required equity awareness so they can act as role models both to colleagues and outside of the company.

The following considerations should be applied when drafting diversity actions:

- Distinguish between company-level and project-level actions to be included in company and project-level action plans, as per example tables set out on page 30.
- Include gender performance indicators and gender, age, ethnicity, race and disability (and other relevant dimensions) disaggregated targets to monitor if and when objectives are achieved.
- Provide a timeline for achieving targets.

When planning, distinguish between short-term outputs, end-of-project outcomes, and long-term results that will be achieved after the project ends. While the project may not directly achieve these long-term results, it can monitor and report progress towards their attainment.

For instance, the project might aim to have an equal number of men and women offered an engineering position; however, the gender analysis, conducted by a capable personnel within the project developer company or a gender expert, has revealed that women are less likely than men to have an engineering qualification. The action plan could therefore set gender-responsive targets, wherein targets are directed towards the recruitment of women and/or mentoring, such as:

- Ensuring a gender-responsive recruitment process (e.g., actively encouraging women to apply for jobs at the company by using gender-neutral terms or indicating how the employer supports flexible working hours in the job advertisement).
- In the recruitment process, aiming for at least 50% of the shortlisted candidates to be women and/or from diverse backgrounds.
- Establish a partnership with a local university to offer scholarships to women or minorities to study engineering.
- Incentivising the mentoring of women within the company towards engineering or construction positions (e.g. paying for educational courses in engineering or training in the field).
- Creating a budget that translates gender equality objectives into fiscal commitments.



Good practice considerations:

Objectives and actions should be derived from the issues and risks identified during the diversity analysis.

Performance indicators should be used to measure and demonstrate the following:

- Differences in participation, benefits, outcomes and impacts for women, men, boys, girls, minorities and vulnerable groups.
- Changes in gender relations, which includes changes toward equity, between men and women, and between girls and boys.
- How these changes impact on the achievement of development objectives, particularly economic growth, poverty reduction and sustainable development.

- How this data has assisted in achieving goals or successes within the company, retention of staff, etc.

Ensure alignment with local laws and international best practice on labour standards, Grievance Redress Mechanism, stakeholder engagement and the related indicators monitored (refer to Camco’s ESMS toolkit).



Tips for choosing good indicators:

- **Valid:** Measuring what the indicator is intended to measure.
- **Specific:** Measuring only the particular aspect of the initiative it is intended to measure.
- **Reliable:** Minimising random error and producing the same result consistently, given the same set of circumstances, including the same observer or respondent.
- **Comparable:** Enabling comparisons of results or effectiveness over time, and in different contexts.
- **Precise:** Using clear, well-specified definitions.
- **Relevant:** Clearly linked to an input, output or outcome of the project or initiative being measured.
- **Verifiable:** Able to be proven or tested empirically.

Consider the following when establishing a budget for the Diversity Action Plan:

- Ensure sufficient resources, both people and funds, are available for advancing equality and women’s empowerment activities.
- What expenditures can be allocated to social inclusion of the total budget?
- What are the assumptions informing budgets?
- Potential reports, workshops, training events, travel etc. that are required at the project and company level.
- Security measures required to ensure safety within the workplace
- Align gender budgets with the government’s gender budgeting system (if this has been established) to contribute to data collected on national gender targets.



Create your Diversity Action Plan in a separate document using the template provided below for both the company and project levels.

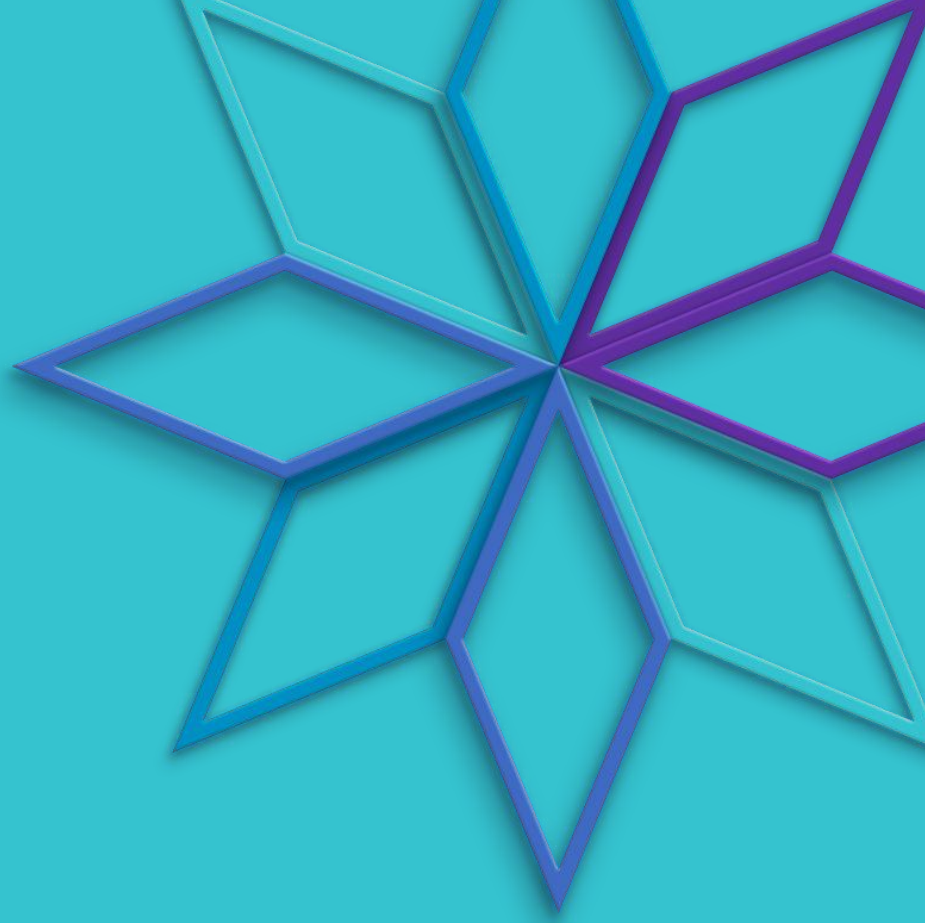
Company-/project-level Diversity Action Plan

OBJECTIVE	ACTION	INDICATORS	TARGETS	TIMELINE	RESPONSIBILITIES	COSTS
[add objective] e.g. What are you aiming to achieve, change, deliver or produce?	[specify action(s)] Describe the intervention	[specify indicator(s)] e.g. How will the interventions etc. be measured? e.g. What quality standards will be used?	[specify target(s)] e.g. target KPIs e.g. Desired behavioural change	[specify timeline] e.g. When will results be achieved?	[specify responsibilities] e.g. Who will lead? Who will deliver?	[specify costs]

Example of a partially completed Diversity Action Plan

OBJECTIVE	ACTION	INDICATORS	TARGETS	TIMELINE	RESPONSIBILITIES	VERIFICATION DOCUMENTS	COSTS
Example 1: Gender balanced employment	Contract women in civil works, financial and customer services, and as female engineers.	Number of women and men employed through jobs created from the project in each job category (person-days).	30 women 40 men	dd/mm/yyyy	Operations Manager	Employment contracts	USD: [Would be defined based on extra effort invested in job advertising, recruitment process, ensuring women's safety and facilities for female on site.]
	Require contractors to employ local labour, including women, as appropriate.	Number of women and men shortlisted for job interviews in each job category.	45% female candidates 55% male candidates	dd/mm/yyyy	HR Manager	Employee log	
Example 2: Improved access to affordable electricity	Consult women and vulnerable groups during stakeholder engagement to ensure their needs are met in the product offering. Inform women and vulnerable groups on the service offering and requirements. Encourage women and vulnerable	Number of households and individuals, disaggregated by gender and age with improved access to renewable energy source.	Arrange three community consultations specific to women and other vulnerable groups. 40% of customers by 2022 to be women	dd/mm/yyyy	Community Liaison Officer	Stakeholder engagement meeting minutes from focused group discussions	USD: [Would be defined based on extra community meetings and marketing efforts that need to be arranged.]

	groups to apply for financing.						
Example 3: Equal pay for equal work	<p>Annual diversity pay gap analysis.</p> <p>Present results to employees. Readjust salaries where relevant. Commit to equal pay for equal work in company HR policy.</p>	Raw pay gap based on gender and race, further disaggregated by age and position.	<p>Narrow gap to 10% by next year</p> <p>0% pay gap within three years from original assessment.</p> <p>All new staff compensated equally.</p>	dd/mm/yyyy	Management team, HR Manager	Pay gap analysis calculation, to be aligned with employment contracts and employee logs.	USD: [Would be defined based on hours spent on analysing data and required budget to narrow gap based on results.]



Step 3. Monitoring and reporting

Monitoring is the process of assessing planned changes against baseline data collected at the project's (or subproject's) inception. Reporting is the act of conveying those changes in numbers and narrative and explaining any variances in anticipated results.

Project companies should ensure that the budget allocated to the Diversity Action Plan includes monitoring and reporting on indicators and establishing initiatives to be further key gender performance indicators.

Consider the following when monitoring results of the Diversity Action Plan and a project's gender performance:

- Were activities and processes implemented as planned?
- Were planned results (inputs, outcomes, outputs and/or impacts) achieved i.e., was a change achieved or any other progress made from the baseline?
- Were there any unintended impacts, results, or consequences? If yes and these are negative, explain how, by whom and what actions will be taken to address them. If positive, report how these results might be replicated.



Adjust indicators and targets monitored, monitoring frequency and data collection methods in your corporate Diversity Action Plan to address gaps.



Good practice considerations:

Employ both qualitative and quantitative data collection methods.

Quantitative equality indicators are numerical measurements of change and are easier to measure and assess against targets.

Qualitative equality indicators such as perceptions, attitudes and feelings can be applied to capture change that is difficult to measure. Qualitative indicators may also focus on perceived analysis of certain types of change, such as diversity analysis of the content of training programmes and how they have impacted individuals, or assessments of available organisational capacity and the ability to resource activities within the organisation.

Key considerations:

- Determine the specific changes sought based on contextual knowledge and feedback from community interviews (e.g., more women applicants for jobs, workplaces changes to accommodate women).
- Collect baseline data on the situation that the project intends to affect change in and set targets for achievement (e.g., at inception only 5% of new hires are women; by [date] it is planned that 20% of new hires will be women).
- Set standards for each planned output or outcome (e.g., more women participate in meetings as measured by attendance, contribution, feeling of being heard and appreciated, ideas and concerns are taken up or acted upon).
- Set diversity-specific targets for women and men in terms of benefits, participation, levels of responsibility and workplace safety.
- Has the collection of disaggregated data (in terms of gender, age or other relevant factors) been carried out throughout the monitoring chain?
- Do progress reports and implementation status reports discuss gender equality results and lessons learned?
- Ensure that the team involved in monitoring is trained on diversity and has a well-balanced representation, with adequate expertise.

- Use gender-sensitive data collection techniques, such as separate focus groups and interview groups for women and men, depending on the context.
- Are you monitoring barriers to participation in project activities (e.g. qualitative analysis on certain diversity-driven initiatives)?
- Ensure diversity-related questions are mainstreamed into monitoring and evaluation plans (e.g., frequent engagement or awareness raising on diversity across the organisation, questionnaires or surveys on perceived gaps in diversity initiative implementation).



Describe indicators monitored, monitoring frequency and data collection methods in your corporate Diversity Action Plan.

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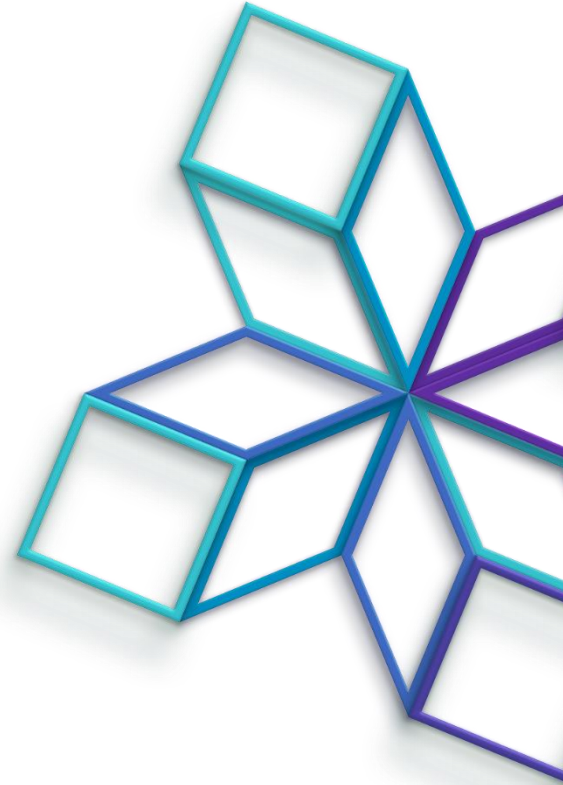
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