হ্যাবিট্যাট ফর হিউম্যানিটি
Habitat for Humanity®
Bangladesh

GENDER EQUITY AND SOCIAL INCLUSION (GESI) POLICY PROCEDURES

1. Purpose and Operating Approach

These Procedures translate the GESI policy into practical steps, decision points, responsibilities and minimum evidence. They are deliberately more operational than the Policy and may therefore include practical guidance that supports the Policy's commitments.

The Procedures are designed around four operating principles: proportionate application, evidence-based decision-making, continuous improvement and document hierarchy. They do not create parallel safeguarding, HR, complaints or annual planning systems.

2. Scope and Proportionality

These Procedures apply across HFHIB programs, projects, operations, offices, field locations, partnerships, advocacy, communications and relevant organizational processes. The level of effort should be proportionate to program size, duration, risk, context, complexity and available capacity. Proportionality must not be used to avoid identifying material gender or safeguarding risks.

3. Roles and Responsibilities .

Role	Operational responsibility
National Director / Senior Management	Set direction; ensure appropriate leadership attention and resources; review progress, systemic barriers and issues requiring management action.
Gender Focal Point / Alternative GFP	Coordinate the GESI policy and Gender Action Plan; provide technical support; support Gender Marker reviews; consolidate learning; perform TOR responsibilities within protected time.
Program / Project Teams	Conduct proportionate gender analysis; integrate findings into design, budgets, implementation, participation, risk management and MEAL; document Gender Marker decisions and actions.
MEAL	Support meaningful gender indicators, appropriate disaggregation, qualitative learning and responsible data use; protect confidentiality and avoid unnecessary sensitive data.
HR	Own gender-related provisions within HR policies and processes; incorporate relevant actions from the GEDSI Work Plan into the HR framework.
Finance / Administration	Support realistic gender-responsive resource planning and operational arrangements within approved budgets, policies and donor requirements.
Communications / Advocacy	Promote respectful and non-stereotyping communication; use evidence and diverse voices

Role	Operational responsibility
	responsibly; protect confidentiality and sensitive information.
Managers / Technical teams	Apply gender considerations within their functions and ensure actions are integrated into existing work processes.
All personnel / associated parties	Uphold the Policy, participate in relevant learning, apply equitable practice and use approved channels for concerns.

4. Annual Gender Action Plan Cycle

The approved Gender Action Plan is HFHIB's principal annual implementation instrument.

- Review the previous period's progress, learning, organizational data, program evidence and outstanding actions.
- Identify a manageable set of priority outcomes and institutional actions that are ambitious but realistic for HFHIB's capacity and operating context.
- Confirm responsibilities, timelines, indicators, resource implications and management ownership.
- Ensure priority actions are reflected in relevant organizational and program plans rather than sitting only within the Gender Action Plan.
- Track implementation through existing management, program and MEAL review mechanisms wherever practical.
- Consolidate progress, learning, barriers and unfinished actions for management review and the next planning cycle.

5. Program Gender Mainstreaming Procedure

5.1 When gender analysis is required

- Complete proportionate gender analysis at concept/design stage and revisit it during major redesign, significant contextual change or when evidence shows that assumptions are no longer valid.
- For emergency or humanitarian programming, use rapid gender analysis where required by the context and available evidence.
- For smaller activities, an approved simplified tool may be used where appropriate, but it must still identify material barriers, opportunities and risks.

5.2 What the analysis should examine

- Gender roles, responsibilities, care work and time use where relevant.
- Access to and control over housing, land, WASH, income, services, information and other resources.
- Decision-making power within households, communities, institutions and relevant systems.
- Barriers to participation, including social norms, mobility, safety, affordability, disability, age, poverty, displacement, geography and other intersecting factors.
- Different capacities, risks, exposure and opportunities for women, men, girls, boys and other relevant groups.
- Risks of exclusion, violence, backlash, household conflict or other unintended harm.
- Practical opportunities to strengthen agency, leadership, access, safety and equitable benefits.

5.3 How findings must influence decisions

Teams should record the key findings and show how they affected one or more decisions, such as targeting, design, participation arrangements, service delivery, risk mitigation, budget, indicators, partnerships or advocacy. A gender

analysis that does not influence any decision should trigger a review of whether the analysis was sufficiently relevant or whether the program assumptions need to change.

6. Gender Marker Procedure

HFHIB will use the HFHIB/HFHI Gender Marker as a quality, accountability and learning tool. The project team is responsible for documenting the rating, evidence and improvement actions; the GFP(s) provide technical support and the sign-off required by the approved TOR.

Stage	Minimum action	Required evidence/output
Concept / design / proposal	Review gender analysis and determine an appropriate Gender Marker rating.	Gender analysis or simplified assessment; documented Marker decision; planned gender actions.
Implementation / routine review	Check whether commitments are being implemented and whether context, assumptions or risks have changed.	Updated actions, issues and learning.
Mid-term / major review	Assess progress against intended gender outcomes and adapt where needed.	Documented adaptation and improvement actions.
Completion / annual review	Capture outcomes, learning, remaining gaps and implications for future programming.	Gender learning and recommendations.

7. Minimum Program Standard and Progression

No HFHIB program should knowingly remain Gender Unaware or Gender Neutral. Gender-Sensitive is the minimum organizational standard. Core Housing and WASH programs should progressively move toward Gender-Responsive practice where evidence, context, risk and feasibility support it. Gender-Transformative practice should be pursued selectively where HFHIB has a credible, safe and responsible opportunity to address root causes or structural barriers.

8. Sector Application

8.1 Housing, Land and Tenure

- Assess gender-related barriers to housing adequacy, affordability, access, safety and tenure security.
- Create meaningful opportunities for women to participate in **housing** design and decisions affecting households and communities.
- Where legally, operationally and safely feasible, support individual or joint recognition of women's ownership, occupancy or tenure interests, with informed support.
- Consider gender-responsive design features such as privacy, safe access, lighting, accessibility, secure locking and appropriate layout.
- Monitor whether housing support changes decision-making, safety, access to resources or household/community relations in intended or unintended ways.

8.2 WASH

- Assess different safety, privacy, accessibility, care and participation needs.
- Engage women and marginalized groups in planning, location, design and facility-related decisions.
- Apply approved inclusive and safe design standards.

- Use monitoring and feedback to identify barriers to equitable use, maintenance and decision-making.

8.3 Climate Resilience and Disaster Risk Reduction

- Consider gender-differentiated exposure, vulnerability, capacities, mobility, care responsibilities and access to resources.
- Use disaggregated and qualitative evidence where feasible and safe.
- Ensure preparedness, early warning, evacuation and communication arrangements consider diverse access and communication needs.
- Support women's participation and leadership in resilience and DRR decisions where context permits.

8.4 Humanitarian Response

- Conduct proportionate rapid gender analysis when required by the emergency context.
- Use findings to inform targeting, participation, distribution, facilities, communication and monitoring.
- Review gender-related risks as the response evolves and adapt implementation where needed.
- Route GBV, SEA/SH, child protection and other safeguarding concerns through approved safeguarding and referral mechanisms; never create a parallel case-management pathway.

8.5 Advocacy and Influencing

- Use gender analysis and evidence to inform advocacy positions, policy asks and engagement strategies.
- Promote the voice, agency and leadership of women and marginalized groups.
- Engage women-led, rights-focused and other relevant organizations where appropriate.
- Use HFHIB evidence and lived experience responsibly, ensuring informed participation and protection of confidential or sensitive information.
- Reflect relevant gender outcomes and learning in communications and donor reporting without reinforcing stereotypes or exposing individuals to risk.

9. Meaningful Participation, Decision-Making, Leadership

- Plan participation intentionally; representation targets, where used, are a means to improve inclusion, not the outcome itself.
- Assess whether women and marginalized groups can speak, influence decisions, take leadership and safely raise concerns.
- Select meeting times, locations, language, facilitation methods and formats that reduce avoidable barriers.
- Use women-only or targeted consultations where context indicates that mixed participation would limit voice or safety.
- Record how participant feedback influenced program or organizational decisions.
- Monitor unintended exclusion, backlash or increased risk and adapt accordingly.

10. Partnerships and External Actors

Where relevant to the partnership, teams should include proportionate gender expectations in partner selection, agreements, scopes of work, implementation plans or review discussions. Expectations may include gender analysis, meaningful participation, safeguarding alignment, data responsibility, gender-related deliverables or learning.

Partner requirements should be realistic and proportionate to the partner's role and capacity. Where a partner identifies a material gender or safeguarding risk, the responsible HFHIB team should ensure it is addressed through the appropriate organizational mechanism.

11. Safeguarding and Protection – Cross-Reference

Gender Procedures do not handle safeguarding cases. Staff and associated parties must use the approved HFHIB Safeguarding Policy, PSEA arrangements and complaint/referral mechanisms.

Gender analysis should identify and help mitigate gender-related risks, but case intake, triage, investigation, referral, confidentiality, survivor support and disciplinary action remain governed by the relevant safeguarding and HR instruments. Identifiable safeguarding information must not be included in routine gender monitoring, GEDSI Work Plan reviews.

12. HR Interface – No Duplication

The Gender Procedures do not prescribe detailed recruitment, pay, leave, flexible work, maternity/paternity arrangements, workplace facilities, performance management, promotion, transfer, employee relations or disciplinary processes. These are governed by the HR Policy/Manual and relevant procedures.

During HR policy and process reviews, relevant gender interfaces should be considered, including non-discriminatory recruitment and career practices, equal opportunity, gender-aware workforce data, reasonable accommodation, gender competence in learning/performance processes, and actions addressing identified barriers to women's recruitment, retention and progression.

13. Organizational Culture and Behaviour

- Integrate respectful, inclusive and gender-equitable behaviour expectations into induction, leadership development, learning and management practice.
- Use organizational learning to identify barriers to voice, opportunity, leadership and progression.
- Promote an environment where personnel can raise concerns through established organizational channels without creating a separate gender complaints mechanism.
- Where gender-related organizational actions are identified, assign ownership and resources through existing management and HR systems.

14. Capacity Building and Learning

- Provide orientation on the GESI policy, key concepts and practical responsibilities.
- Provide role-specific support on gender analysis, Gender Marker use, meaningful participation, sector application, budgeting and MEAL.
- Integrate gender learning into induction, leadership, program, MEAL and technical learning wherever possible.
- Use practical cases and reflection based on HFHIB's operating context.
- Document key learning and feed it into program adaptation and the annual Gender Action Plan.

15. Gender-Responsive MEAL and Data

- Select a meaningful gender indicator relevant to the intervention rather than collecting data solely for compliance.
- Use sex-, age- and disability-disaggregated data where relevant and feasible, with appropriate consent, confidentiality and data protection.
- Combine quantitative evidence with qualitative learning on agency, influence, access, safety and barriers.
- Assess unintended negative effects, exclusion, backlash or other changes in risk.
- Use findings to adapt activities and document lessons for future programming.
- Use existing MEAL systems where practical rather than creating parallel gender reporting tools.

16. Gender-Responsive Budgeting and Resource Allocation

- Identify and use relevant gender-related resources and guidance during concept development, project design, and annual planning.
- Reflect appropriate gender-related costs in program and organizational budgets according to intervention needs, risk, donor requirements and available resources.
- Discuss significant resource implications with Finance/Admin and relevant management during planning and budget review.
- Ensure ambition is matched by realistic resources; where resources are constrained, prioritize actions that address material barriers and risks.

17. Monitoring, Reporting and Learning

- Track implementation of the approved Gender Action Plan through existing management and MEAL mechanisms.
- Prepare periodic progress updates using Work Plan indicators and relevant program and organizational evidence.
- Use annual learning to identify what changed, what did not, unintended effects, barriers and priorities for the next cycle.
- Report safeguarding case information only through safeguarding channels; routine gender reporting should contain aggregated, non-identifiable information only.
- Update procedures when learning, HFHI guidance, organizational systems or operating context materially changes.

18. Decision and Escalation Points

- If gender analysis identifies a material barrier or risk, the responsible team must document how the program will address, mitigate or monitor it.
- If a program cannot reasonably meet the minimum Gender-Sensitive standard, the issue should be discussed with the GFP and relevant management before approval or continuation.
- If a proposed gender action could create significant safety, backlash, safeguarding or protection risks, pause the action and consult the appropriate safeguarding and management mechanisms.
- If a gender-related resource requirement is material and not included in the approved budget, escalate it through the normal budget and management process.
- If evidence shows that an intervention is not producing intended equitable outcomes, adapt the intervention rather than treating the original design as fixed.

19. Alignment with GFP TOR and Gender Action Plan

These Procedures support, but do not replace, the approved GFP and Alternative GFP TOR. The TOR remains authoritative for detailed roles, responsibilities, reporting and protected time.

The approved Gender Action Plan remains the authoritative annual implementation plan. These Procedures should not reproduce its activity matrix, dates or individual targets; instead, teams should use the Work Plan to identify current priorities, responsibilities and indicators.



20. Document Hierarchy and Duplication Control

Topic	Primary governing instrument	Role of Gender Procedures
Gender vision, commitments and organizational ambition	GESI policy	Provides implementation direction; do not reproduce the full policy narrative.
Safeguarding, GBV, SEA/SH, child protection, complaints, referrals and case management	Safeguarding Policy / approved safeguarding and PSEA procedures	Identify and mitigate gender-related risks; cross-refer; no parallel mechanism.
Recruitment, leave, remuneration, performance, promotion, workplace facilities and employee relations	HR Policy/Manual and procedures	Identify gender-related interfaces; do not duplicate HR rules.
GFP roles and protected time	Approved GFP TOR	Reference and support implementation; do not reproduce the TOR.
Annual gender priorities, activities, indicators and timelines	Approved Gender Action Plan	Provide implementation process; do not reproduce the annual matrix.
Gender Marker methodology and program application	Gender Procedures and approved program tools	Provide operational steps and evidence requirements.
Program gender analysis, participation and sector integration	Gender Procedures	Provide practical implementation steps.
Organizational and program learning	GEDSI Work Plan + MEAL systems	Support evidence, reflection and adaptation.

Annex 1: Minimum Program Gender Review Checklist

- Has proportionate gender analysis been completed?
- Have relevant intersectional barriers, capacities and risks been considered?
- Is the proposed Gender Marker rating supported by evidence?
- Are women and marginalized groups able to participate meaningfully and influence decisions?
- Have relevant gender-related safety, privacy, accessibility and protection risks been considered?
- Are material gender implications reflected in design, budget, implementation and MEAL?
- Have relevant partner gender expectations been considered where applicable?
- Are safeguarding concerns routed through approved safeguarding mechanisms rather than gender processes?
- Are sensitive or identifiable safeguarding data excluded from routine gender reporting?
- Are lessons and adaptation actions recorded for the next review?

Annex 2: Practical Evidence Examples

Evidence area	Examples
Analysis	Gender analysis, rapid assessment, consultation findings, barrier mapping, context evidence.
Participation	Participant composition plus evidence of influence, feedback integration and accessibility measures.
Design	Design changes addressing privacy, safety, accessibility, mobility, care, tenure or equitable access.
Budget	Documented gender-related resource implications and approved budget allocations where material.
Implementation	Records showing gender commitments implemented or adapted.

Evidence area	Examples
MEAL	Relevant disaggregated data, qualitative findings, outcome stories and documented adaptations.
Learning	Review notes, lessons, management decisions and actions carried forward into planning.
Proportionate disaggregation	Data should disaggregate to the extent that is relevant, useful, feasible, and proportionate to the program and its potential gender/equity impacts. It does not mean that every indicator must always be disaggregated by every possible characteristic.

Annex 3: Key Reference Documents

- HFHIB GESI policy
- HFHIB Safeguarding Policy and related procedures
- HFHIB Human Resources Policy/Manual and related procedures
- HFHIB Code of Conduct and PSEA arrangements
- HFHI Gender Equity in Housing Framework and HFHIB Gender Marker
- Approved Gender Focal Point and Alternative Gender Focal Point TOR
- Approved Gender Action Plan for the relevant financial year
- Relevant HFHIB program, MEAL, data protection and accountability tools

- n this context, **"proportionate disaggregation"** means that HFH Bangladesh should disaggregate data **to the extent that is relevant, useful, feasible, and proportionate to the programme and its potential gender/equity impacts**. It does **not** mean that every indicator must always be disaggregated by every possible characteristic.
- **Suggested policy wording**
- I would recommend revising the sentence to:
- **Track meaningful outcomes through proportionate and appropriate disaggregation of quantitative data, including by sex, age, disability, location, and other relevant characteristics where appropriate, complemented by qualitative evidence. The level of disaggregation should be proportionate to the programme context, intended outcomes, and identified gender and inclusion risks, while protecting confidentiality and avoiding unnecessary collection of sensitive personal data.**
- **What "proportionate" means in practice**
- For HFH Bangladesh, the policy could explain that disaggregation should be determined based on:
  1. **Programme relevance** – Disaggregate information that helps understand whether different groups have equitable access to, participation in, and benefit from the programme.
  2. **Gender and inclusion risks** – Where a programme has a higher potential to create or reinforce gender or other inequalities, more detailed disaggregation may be appropriate.
  3. **Availability and feasibility** – The 8rganization should not create excessive reporting requirements where collecting additional categories would provide little value.
  4. **Data protection and confidentiality** – Avoid collecting or reporting categories where the number of individuals is so small that people could potentially be identified.
  5. **Decision-making value** – Data should be disaggregated where the findings can inform programme design, implementation, adaptation, or accountability.
- **Example for HFH Bangladesh**
- For a **housing project**, sex and disability may be particularly relevant to assess equitable access and participation. Therefore, beneficiary and participation data could be disaggregated by:

- Women/girls and men/boys, as appropriate;
- Age groups;
- Persons with disabilities;
- Geographic location; and
- Other characteristics relevant to the programme context.

- For a **staff training programme**, sex and role/function may be more relevant, while detailed household-level characteristics may not be necessary.
- For a **small community activity**, collecting highly detailed demographic information may not be proportionate if it creates privacy risks or does not contribute meaningfully to programme decisions.
- **Why "proportionate" is useful in the policy**
- Using **"proportionate"** gives programme teams flexibility while still creating an expectation that gender and inclusion considerations must be evidenced. It avoids a situation where the policy says that **every dataset must be disaggregated by sex, age, disability, location, etc.**, even when some of those categories are irrelevant or could create confidentiality risks.
- I would therefore use **"proportionate and appropriate disaggregation"** rather than simply "appropriate disaggregation." It communicates both the **need for meaningful gender analysis** and the principle of **not collecting data unnecessarily**.

Document Control

Item	Procedure position
Procedure owner	National Director
Approved by:	**Muhammad Mahfuzur Rahman** **National Director**
Effective date:	September 22, 2026
Technical lead	Gender Focal Point and Alternative Gender Focal Point
Primary users	Program, MEAL, HR, Finance/Admin, Communications, managers and relevant technical teams
Related instruments	HFHIB GESI policy; Safeguarding Policy and procedures; HR Policy/Manual; Code of Conduct/PSEA arrangements; HFHI Gender Equity in Housing Framework; HFHIB Gender Marker; approved Gender Action Plan; GFP TOR
Review cycle	Annual implementation review; formal update normally every three years or earlier as needed

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