

How to....Make Compliance LGBTQIA+ Inclusive

Compliance frameworks - codes of conduct, anti-discrimination policies, safeguarding systems, reporting mechanisms, and legal obligations - form the backbone of how humanitarian organisations manage staff professional behaviour and protect communities. Yet in many organisations, these frameworks were not designed with LGBTQIA+ staff or beneficiaries in mind, leaving significant gaps in protection, reporting, and accountability.

Making organisational compliance LGBTQIA+ inclusive means going beyond text in a policy document. It means examining every stage of compliance through a SOGIESC (Sexual Orientation, Gender Identity and Expression, Sex Characteristics) lens, and ensuring that the compliance systems themselves do not inadvertently discriminate against or exclude LGBTQIA+ staff and communities.

- **Inclusion Is Not Optional:** International humanitarian and human rights standards require non-discrimination on the basis of diverse SOGIESC. Compliance frameworks must reflect this.
- **Gaps Create Risk:** Policies that do not explicitly cover diverse SOGIESC, leave LGBTQIA+ staff and beneficiaries without recourse and expose organisations to reputational and legal liability.
- **Context Sensitivity Is Essential:** Compliance measures must be adapted to local environments while maintaining global standards of dignity and protection.
- **Trust Enables Reporting:** LGBTQIA+ staff are less likely to report violations if they do not trust that systems are designed with their safety and confidentiality in mind.

Practical Steps for Aid Organisations

1. Audit Existing Compliance Frameworks for SOGIESC Gaps

- Review your organisation's Code of Conduct, anti-harassment policy, safeguarding framework, HR policies, and whistleblowing procedures. Does each document explicitly prohibit discrimination and harassment on the basis of diverse SOGIESC?
- Check whether your policies align with international standards, including the [Yogyakarta Principles](#) and the UN's own non-discrimination frameworks.
- Can LGBTQIA+ staff and beneficiaries report SOGIESC-based violations safely, confidentially, and without risk of secondary discrimination?

Tip: Involve LGBTQIA+ staff and community representatives in the process wherever it is safe to do so. They will identify gaps that others may overlook.

2. Update Policy Language to Explicitly Include SOGIESC

- Amend all relevant policies to explicitly name sexual orientation, gender identity, gender expression, and sex characteristics as protected grounds. Vague language such as “other characteristics” is insufficient.
- Define key terms clearly within policy documents or in an accompanying glossary: SOGIESC, LGBTQIA+, gender identity, intersex.
- Where local society norms conflict with organisational inclusion standards, use neutral or internationally recognised framing (e.g. referencing UN non-discrimination standards) to maintain protection without exposing staff to risk.
- Ensure gender-neutral language is used throughout policy documents, including in pronoun use, titles, and references to relationships and family.

3. Make Reporting Safe and Accessible for LGBTQIA+ Staff

- Review reporting mechanisms: Are they confidential? Do they require disclosure of SOGIESC identity? Are they accessible to staff who may not be ‘out’ in the workplace?
- Offer multiple reporting channels such as anonymous hotlines, online forms, trusted focal points, so that LGBTQIA+ staff are not forced into a single pathway that may feel unsafe.
- Train designated focal points and HR staff to receive SOGIESC-related disclosures with sensitivity, confidentiality, and without judgement.
- Clearly communicate to all staff that reporting SOGIESC-based discrimination or harassment is protected, and that retaliation against anyone who reports is itself a disciplinable offence.

4. Compliance and HR Teams on diverse SOGIESC

- Ensure that all staff involved in compliance, HR, safeguarding, and investigation processes receive specific training on diverse SOGIESC.
- Include diverse SOGIESC in safeguarding training for all staff, so that awareness is organisation-wide rather than specialist knowledge.
- Address unconscious bias explicitly: staff who hold personal reservations about LGBTQIA+ inclusion can still be engaged to apply policies consistently.

5. Accountability and Safeguarding for Beneficiaries and Communities

- Ensure that safeguarding and accountability frameworks explicitly protect LGBTQIA+ beneficiaries and community members from SOGIESC-based harm.
- Include SOGIESC-sensitive questions in community feedback mechanisms and complaints systems. Ensure anonymity and data protection.
- Train programme staff on how to identify and respond to SOGIESC-based protection needs among beneficiaries, including appropriate referral pathways.

- Work with local LGBTQIA+ civil society organisations to understand how compliance systems can be made more accessible and trustworthy for displaced and marginalised LGBTQIA+ communities.

6. Vet Partners and Contractors Against Inclusion Standards

- Include SOGIESC non-discrimination requirements in partnership agreements, sub-grant contracts, and supplier due diligence processes.
- Conduct proportionate assessments of partners' own compliance frameworks where programmatic collaboration involves direct contact with LGBTQIA+ staff or beneficiaries.
- Provide partners with accessible guidance and resources on SOGIESC inclusion.

7. Monitor, Review, and Report on SOGIESC Compliance

- Track SOGIESC-related incidents, complaints, and outcomes as part of regular compliance and safeguarding reporting. Disaggregate data where it is safe and appropriate to do so.
- Include SOGIESC inclusion progress in annual reports, donor reporting, and internal accountability mechanisms where this can be done safely.
- Review policies and training materials annually, or following significant incidents, legal changes, or shifts in the operational context.
- Share learnings across the sector where appropriate. Contributing to collective knowledge on LGBTQIA+-inclusive compliance strengthens the entire humanitarian system.

Additional Resources

- **The PRIDE Centre:** Templates, legal analysis, and tools for [LGBTQIA+ inclusion](#) in humanitarian settings.

☑ Checklist for Organizing Pride in Restrictive Environments

- [] **Audit Existing Frameworks:** Review all compliance, HR, and safeguarding policies for SOGIESC gaps. Note where protections are absent, vague, or insufficient.
- [] **Update Policy Language:** Explicitly name SOGIESC as protected grounds in all relevant documents. Define key terms and use gender-neutral language throughout.
- [] **Review Legal Context:** Seek HR/legal guidance on how to maintain SOGIESC inclusion standards in restrictive environments. Reference The PRIDE Centre's legal analysis documents.
- [] **Involve LGBTQIA+ Voices:** Include LGBTQIA+ staff and community representatives in policy review and design processes, where safe to do so.
- [] **Make Reporting Safe:** Ensure reporting mechanisms are confidential, accessible, and do not require identity disclosure. Offer multiple channels.
- [] **Train Focal Points and HR Staff:** Provide SOGIESC-specific training to all staff involved in compliance, HR, safeguarding, and investigations.
- [] **Train All Staff:** Embed SOGIESC into organisation-wide compliance and safeguarding training.
- [] **Protect Beneficiaries:** Extend SOGIESC safeguarding protections to communities. Include inclusive questions in feedback and complaints mechanisms where safe.
- [] **Update Partner Agreements:** Include SOGIESC non-discrimination standards in partnership agreements, sub-grants, and supplier contracts.
- [] **Track and Report:** Monitor SOGIESC-related incidents and compliance outcomes. Include in internal and external reporting where appropriate.
- [] **Review Annually:** Reassess policies, training, and reporting mechanisms at least once a year or following significant changes.
- [] **Share Resources:** Direct staff to [The PRIDE Centre](#) for information and guidance.

SUPPORTED BY

With the
participation
of



LUSH



Activity supported by the
Canada Fund for Local Initiatives
Activité réalisée avec l'appui du
Fonds canadien d'initiatives locales

Canada

