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Multi-Level Framework for Addressing SEAH in the Tea Sector

This paper sets out the Ethical Tea Partnership's (ETP) framework for addressing sexual exploitation, abuse and harassment (SEAH) in the tea sector as part of our broader mission of fostering Empowered, Safe Tea Communities. It highlights the persistent drivers of SEAH within the tea sector and outlines ETP's approach to supporting prevention, mitigation, response, remedy and collective action across the industry.

Aligned with gender-responsive Human Rights Due Diligence (HRDD), the framework is intended primarily to guide ETP's own programming, partnerships, convening and engagement with industry stakeholders. Although not designed as a business implementation framework, it aligns with existing business-focused frameworks and guidance, including the UN Guiding Principles on Business and Human Rights (UNGPs), ILO Convention 190 on violence and harassment in the world of work (ILO C190) and ETI's GAIA principles to end gender-based violence and harassment in commercial agriculture and fisheries, to support shared understanding and engagement across the tea sector.

ETP remains steadfast in its commitment to working with partners to address this deep-rooted and systemic issue, and to advancing a tea supply chain where all human rights abuses are effectively identified, prevented, mitigated and remediated.

Background to SEAH in the tea industry

SEAH refers to violations of a sexual nature occurring in the workplace, including unwanted sexual advances, sexual coercion, sexual assault, and other forms of sexual misconduct. SEAH is overwhelmingly perpetrated by men against women and girls, reflecting unequal gender and power relations. Women and girls facing intersecting inequalities, such as women with disabilities or migrant women, are at heightened risk. SEAH typically arises from the abuse of hierarchical structures and power imbalances, in which individuals exploit their authority for sexual gain and to assert control or dominance. SEAH is often reinforced by workplace cultures, social norms, power imbalances and organisational practices that enable abusive behaviour, discourage reporting, or fail to hold perpetrators accountable, requiring sustained efforts to transform the behaviours, norms and cultures that allow SEAH to persist.

While the framework recognises that SEAH forms part of the broader spectrum of gender-based violence and harassment (GBVH) in the world of work, it focuses specifically on SEAH because it has emerged as one of the most salient human rights risks within tea supply chains. At the same time, the framework recognises that workplace-related SEAH is shaped by wider gender inequalities and forms of gender-based violence that extend beyond the workplace.

The tea industry has long been aware that SEAH is prevalent on tea estates, with increasing evidence emerging over the past 20 years. Since 2019, the issue has gained broader public attention through high-profile court cases against tea producers in Malawi alleging systemic abuse, and a 2023 BBC Panorama investigation documenting widespread SEAH on Kenyan tea estates. These developments increased pressure on the tea industry to shift from awareness to accelerated action. SEAH is now widely recognised as a significant human rights issue in tea supply chains, requiring enhanced due diligence in line with the UNGPs and emerging HRDD legislation.

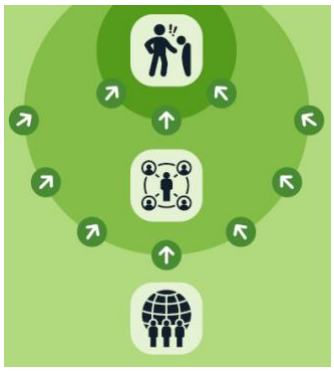
In recent years, several producer companies and other industry stakeholders have taken meaningful steps to examine and address SEAH. From women's empowerment initiatives designed to support women's leadership within tea estates, to strengthened grievance mechanisms for reporting SEAH cases, commendable progress has been made on many tea estates to create safer working environments. Despite this progress, women working in the tea sector continue to face significant risks, underscoring the need for deeper and scaled-up collective action.

SEAH risks in the tea sector are heightened by a combination of interconnected social, economic, workplace and structural factors, including:

- **Gender inequality**: When women are considered to have less value and fewer rights than men, they are more vulnerable to experiencing SEAH. Many tea producing countries exhibit high levels of gender inequality, and rural areas where tea is produced often have more deeply entrenched patriarchal norms that are resistant to change.
- **High concentration of women in low-paid roles**: Women are the majority of tea workers in most tea producing countries. The industry displays marked occupational segregation, with women concentrated in lower-skilled, low-earning roles such as tea plucking.
- **Limited representation of women in management and leadership roles**: Deeply rooted gender norms restrict women's access to supervisory and managerial positions, resulting in female pluckers typically reporting to male supervisors. This lack of gender diversity in leadership increases the risk of abuse.
- **Concentration of power and decision-making within workplaces**: Hierarchical management structures often centralise substantial power in specific roles, particularly middle-management positions such as estate supervisor roles, without adequate oversight.
- **Low earnings and economic insecurity**: Related to broader supply chain pressures and the low and volatile price of tea, most tea workers and tea farmers do not earn a living wage or living income, meaning that they cannot afford a basic standard of living. This economic insecurity heightens their vulnerability to sexual exploitation.
- **Precarious employment**: Tea plucking is often informal, seasonal, and insecure. Middle managers often determine daily work allocations and pay, increasing workers' economic insecurity. This can be especially true for migrant workers who arrive for peak harvest periods.
- **Dependence on employers for basic needs**: In many estate settings and larger smallholder farms workers rely on employers not only for wages but also for housing, childcare, healthcare and sometimes food provision. This dependence can reinforce power imbalances, limit workers' ability to refuse or report abuse, and increase the risks of coercion and exploitation.
- **Remote and isolated working environments**: Due to the rural locations of tea estates, workers often have limited alternative income-generating opportunities and reduced access to external survivor services, women's rights organisations, police, legal assistance and healthcare. These barriers can make it more difficult to safely report abuse or access justice and GBV response services. Additionally, tea estates often span vast areas, meaning workers may be isolated while carrying out their work or travelling to and from work, increasing their vulnerability to SEAH.

ETP's Multi-Level Framework for Addressing SEAH in the tea industry

ETP works with members and partners across the tea sector to address key sustainability and human rights risks related to Equality, Economics and the Environment. Through the design and delivery of locally-led programmes in tea-producing regions, the promotion of responsible business practices within the tea industry and the facilitation of collaboration between tea companies, tea-growing communities, governments and civil society, ETP supports the sector in addressing human rights and environmental risks, including SEAH. In doing so, ETP helps to close a significant industry gap by providing trusted, shared resources, evidence and peer learning spaces and collaboration opportunities that enable more open dialogue and practical, joined-up problem-solving on SEAH risks.



This framework builds on ETP's earlier report, A Private Sector Approach for Addressing SEAH, developed by Claire Lynch Consulting (CLC) and Partner Africa in 2024. The research identified the drivers of SEAH across three interconnected levels: individual power imbalances, the working and living environment, and the wider supply chain and socio-cultural context. Drawing on this research, alongside insights from ETP's programmes and broader work in the tea industry, the framework sets out an approach for addressing SEAH against the same three levels.

At the same time, the framework aligns with the core components of gender-responsive HRDD, which requires companies to embed responsible business conduct into policies and management systems, identify and assess actual and potential impacts, take action to prevent and mitigate harm, track effectiveness, communicate how impacts are addressed, and provide for or cooperate in remediation where appropriate.

For SEAH, effective risk identification requires proactive and meaningful engagement with workers and their representatives, particularly women and other groups facing heightened vulnerability or marginalisation, as well as women's rights organisations and broader affected communities. This is especially important given that SEAH is often hidden, under-reported and difficult to identify through traditional audit-based approaches alone. A gender-responsive approach to risk identification also requires attention to intersecting forms of discrimination and marginalisation, recognising that risks may be heightened for groups such as migrant workers, workers with disabilities, young workers and casual or temporary workers. Implementation of the framework should therefore be informed by ongoing engagement with workers, trade unions, survivors, women's rights organisations and affected communities, ensuring that women and other groups facing heightened vulnerability or marginalisation are able to participate meaningfully in shaping prevention, response and accountability efforts.

Through programming, technical advice, member engagement and the promotion of responsible business practices, ETP supports companies in the tea sector in implementing and improving their gender-responsive HRDD processes. ETP's programmes in particular aim to prevent and mitigate adverse impacts, as well as improve the response when issues occur.[1] Accordingly, this framework focuses on prevention, mitigation, response and access to remedy within the HRDD cycle.

[1] While ETP can support its members through programmes, convening, technical advice and shared learning, the OECD guidance is clear that the responsibility for due diligence cannot be shifted to or replaced by third parties. It is therefore the responsibility of individual companies to identify, prevent, mitigate and address adverse human rights impacts connected to their operations and business relationships.

Box 1: Applicability Across Tea Production Systems

While public attention on SEAH in the tea industry has so far centred on tea estates in Kenya and Malawi, the risk of SEAH exists across all supply chains and workplaces globally, although the nature, severity and drivers of risk vary by context.

This framework draws primarily on learning and evidence from tea estate settings in Kenya and Malawi and is therefore most directly applicable to tea estate and other formal employment contexts within tea supply chains. While many of its principles may also be relevant in smallholder systems, further research is needed to understand SEAH risks and effective responses in the smallholder context.

The central message of the framework is that addressing SEAH risks is a shared responsibility that no single actor can address alone. Producers play a critical role in shaping day-to-day working conditions, while buyers influence those conditions through purchasing practices, commercial decisions, and supplier requirements. Adjacent to the supply chain, governments, law enforcement agencies, women's rights organisations, and survivor support services each play essential and complementary roles. As a membership organisation, ETP's role is to support, convene and catalyse coordinated action across the tea industry, working with a broad range of stakeholders to strengthen alignment, shared learning and coordinated action on SEAH. Given the complexity of SEAH and the range of actors involved, the framework adopts a contribution-based approach, recognising that lasting progress depends on the actions and accountability of multiple stakeholders across the wider system.

Because SEAH is shaped by factors operating at multiple levels, interventions must also operate at multiple levels. Progress at one level reinforces progress at others: safer workplaces are strengthened by supportive legal frameworks and responsible supply chain practices, while efforts to strengthen individual's voice, agency and leadership are more effective when supported by inclusive and accountable workplaces. This interconnected approach is essential to addressing the root causes of SEAH and to building a tea sector where all workers are safer, more empowered, and treated with dignity and respect.

Individual level



At the centre of the framework are the people who live and work within tea communities. At the individual level, risks are shaped by unequal gendered power relations, economic vulnerability and harmful social norms and behaviours. Interventions therefore focus on reducing vulnerability to SEAH, strengthening women's agency, voice, leadership and awareness of rights, and ensuring all individuals can safely access support, accountability and remedy.

Prevention and mitigation focused interventions aim to:

- Strengthen tea workers' economic resilience to reduce vulnerability to SEAH;
- Build confidence, collective voice, agency and awareness of rights among women and workers facing heightened vulnerability, including through peer support networks and safe spaces, so they can participate meaningfully in workplace decision-making and raise concerns safely;
- Challenge harmful gender norms, behaviours and cultures that enable or tolerate SEAH through behaviour change approaches that engage men and boys, promote positive and equitable masculinities, strengthen bystander action, and reinforce clear individual accountability.

Response and remedy focused interventions aim to:

- Ensure all individuals can safely access trusted, confidential and survivor-centred reporting mechanisms, including workers who may face additional barriers to access, representation or participation;
- Strengthen access to psychosocial, medical, legal and safety support services;
- Reduce the barriers which individuals face in reporting and accessing support, accountability and remedy, including fear of retaliation, stigma, discrimination and economic dependency.

Box 2: ETP's work at the individual level – Ulalo VSLAs

Much of ETP's work centres around strengthening the economic resilience, agency and voice of tea workers and farmers, with a focus on women.

From 2021–2024, ETP's Ulalo 'Bridge' programme, delivered in partnership with Bettys & Taylors of Harrogate and Lujeri Tea Estates Limited, supported tea workers in Malawi through Village Savings and Loan Associations (VSLAs). The programme aimed to build workers' economic resilience, improve living standards and support women's empowerment through enhanced financial literacy, increasing female agency, confidence and decision-making power at home, work and in the community.

The final evaluation found that the programme contributed to substantial income growth for participants, particularly women, alongside increased food security, savings, access to credit and reduced reliance on loan sharks. Women were found to have increased decision-making power, particularly around household income expenditure, increased participation in leadership roles, particularly within workplace committees, and greater asset ownership.

The evaluation also found that the programme had contributed to reducing some women's vulnerability to sexual exploitation. As one participant explained:

"*Working here, men used to come for me to serve them sexually and I was getting money from this but these days I refuse because I have money through Ulalo VSLAs*." (FGD participant, Ulalo final evaluation)

Working and living environment



In many tea-producing contexts, workplace and community dynamics are closely interconnected. Living and working environments shape exposure to SEAH, influence power dynamics, and affect whether individuals can safely seek support. Interventions at this level therefore focus on creating safe, accountable and gender-responsive working and living environments, alongside trusted systems for reporting, investigation and survivor support.

The active engagement and commitment of producers, alongside workers and their representatives, is required to shape interventions at this level, recognising that meaningful progress depends on shifts in workplace practices, power dynamics and organisational culture.

Prevention and mitigation focused interventions aim to:

- Establish safe and accountable workplaces through clear policies, leadership commitment, and effective oversight, alongside fostering workplace cultures that actively challenge abuses of power and encourage speaking up;
- Strengthen worker voice, freedom of association, collective bargaining and social dialogue mechanisms, including trade unions, worker committees and women-led

structures, ensuring women's meaningful participation, leadership and influence within these mechanisms, to build trust between workers and management, increase accountability, and reduce unchecked power and authority;

- Promote gender equality in leadership by expanding pathways for women into supervisory, management and decision-making roles, while engaging estate owners, managers, supervisors and male workers to challenge gendered power imbalances, support women's leadership, and create more inclusive and equitable workplaces;
- Partner with women's rights organisations and community actors to challenge harmful social norms and strengthen locally-led prevention efforts.

Response and remedy focused interventions aim to:

- Establish and strengthen trusted, accessible and survivor-centred grievance, reporting, safeguarding and investigation systems that protect confidentiality and guard against retaliation,[2] and are accessible to workers who may face heightened barriers to reporting or support, such as migrant or casual workers;
- Strengthen survivor-centred case management, referral pathways and coordination with support services, authorities and women's rights organisations, while ensuring workplaces maintain responsibility for safe reporting, protection from retaliation and appropriate response to SEAH cases, including child safeguarding considerations where survivors are under 18;
- Support access to effective remedy for those harmed by SEAH, including restitution, compensation, rehabilitation, satisfaction and guarantees of non-repetition, recognising that remediation extends beyond disciplinary action and prevention measures alone.

Box 3: ETP's work at the working and living environment level - Our Tea Our Voice

From 2023–2026, ETP's Our Tea Our Voice (OTOV) programme, delivered in partnership with GIZ, Twining and Co., Ringtons, Ostfriesische Tee Gesellschaft GmbH & Co. KG (OTG), women's rights organisations and tea sector stakeholders, is being implemented in Kenya, Rwanda and Indonesia. The programme aims to support a tea sector where leadership is more inclusive, accountable and transformative, enabling women and other marginalised groups to exercise and enjoy their rights through a rights-based, locally led approach.

OTOV works across both workplaces and communities to strengthen women's leadership, challenge harmful gender norms and create safer, more inclusive workplaces within the tea sector. By the end of 2025, 3,782 people had participated in programme training, with participants reporting increased leadership, decision-making and negotiation skills, and women reporting greater confidence to take on leadership roles. The programme has also strengthened women's and youth networks, and engaged men and boys to promote more supportive attitudes towards women's leadership and shared decision-making.

Alongside prevention efforts, OTOV is strengthening workplace systems for addressing

[2] ETP follows the UNGP effectiveness criteria for non-judicial grievance mechanisms under UNGP Principle 31. This states that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

gender-related grievances and SEAH risks. In Rwanda, the programme has supported Gender Committees across six tea companies and six cooperatives to develop Gender Action Plans. In Indonesia, the Assess, Address, Grievance and Gender Equality Committee has been revitalised and supported through case handling and response training. In Kenya, Gender Champions have been established at tea-buying centres and the programme has supported Assess and Address, and Gender Committees at tea factories.

Structural and supply chain level



SEAH risks in the tea sector are also shaped by wider structural conditions, including global supply chain dynamics, gender inequality, and legal and institutional environments. These factors can reinforce unequal power relations, economic insecurity, discrimination, weak enforcement of protections, and barriers to accountability and access to justice. Interventions at this level therefore focus on influencing the structural conditions that enable SEAH, embedding responsible and gender-responsive practices across the supply chain, and strengthening accountability, enforcement and collective action beyond individual workplaces.

Prevention and mitigation focused interventions aim to:

- Promote gender-responsive and inclusive HRDD across the supply chain, embedding SEAH considerations within policies, management systems and due diligence processes;
- Support buyers and producers to strengthen the identification and assessment of SEAH risks through meaningful stakeholder engagement, including with women, workers facing heightened risks, women's rights organisations and affected communities, recognising that SEAH is frequently under-reported and hidden from traditional audit-based processes;
- Promote responsible purchasing practices. This includes avoiding harmful practices such as excessive downward pressure on price, short-term contracts, last minute order changes and inconsistent order volumes that reduce producers' ability to plan and invest, all of which can exacerbate exploitation and workers' vulnerability to abuse;
- Encourage responsible contracting, ensuring that contracts reflect a shared responsibility for HRDD and workplace safety between both the buyer and the producer, rather than placing the entire burden on the producer as is typical in traditional contracts;
- Strengthen transparency, accountability and traceability systems to improve visibility of sourcing practices and accountability for working conditions at origin;
- Support the effective implementation and enforcement of legal, policy and regulatory frameworks that protect workers from SEAH, uphold labour rights including freedom of association and collective bargaining, strengthen gender equality, and improve access to justice and survivor protection.

Response and remedy focused interventions aim to:

- Encourage buyers to maintain responsible and survivor-centred engagement where SEAH risks or cases arise, rather than disengaging in ways that may further harm workers or reduce access to remedy;
- Support suppliers to strengthen survivor-centred investigation, response and remediation systems, including protection from retaliation, survivor-informed decision-making, and clear company accountability for addressing harms connected to their operations;

- Promote access to effective remedy for those harmed by SEAH, including restitution, compensation, rehabilitation, satisfaction and guarantees of non-repetition, recognising that remediation extends beyond disciplinary action and prevention measures alone;
- Strengthen enforcement, access to justice and accountability beyond individual workplaces, including through more effective and accessible government, legal and justice systems;
- Build sector-wide collaboration, evidence and shared learning on SEAH prevention, mitigation, response and remedy, including through meaningful stakeholder engagement, to inform policy, practice and continuous improvement across the sector.

Box 3: Structural level action – ETP's role in driving accountability and collective action

ETP works at the structural level to strengthen accountability, support gender-responsive human rights due diligence (HRDD), and drive collective action across the tea supply chain to prevent, mitigate and respond to SEAH risks.

Through its membership model, ETP sets clear expectations for companies involved in sourcing, trading, packing and retailing of tea. In 2024, ETP strengthened its membership criteria to strengthen accountability and transparency by requiring members to report on key sustainability issues, including salient human rights risks such as SEAH, relevant policies and codes of conduct, and approaches to implementation across their supply chains. This supports members to strengthen transparency, align with emerging HRDD expectations, and integrate safer and more responsible sourcing and purchasing practices. ETP complements these requirements with peer learning, technical support and shared learning opportunities to support continuous improvement.

ETP also plays a critical convening role to strengthen collaboration and shared accountability across the global tea industry. Through annual multi-stakeholder forums and dialogues, such as the Global Gender Dialogue Day (2023), ETP brings together producers, buyers, civil society organisations and other stakeholders to share learning, strengthen alignment and identify collective actions to address SEAH risks. In 2026, ETP set up the Gender-Responsive HRDD Peer Learning group for ETP members to facilitate collaboration, trusted peer exchange and practical learning, including discussing challenges, emerging practice, and lessons related to gender and SEAH. ETP's leadership of Project Thea is further supporting greater sector-wide alignment on gender and SEAH by promoting harmonised expectations and data requests across tea producers and buyers.

To strengthen the evidence base and support more effective action, ETP commissioned the Protecting People, Transforming Tea – A Private Sector Approach for Addressing SEAH report in 2024, and has also supported targeted in-country research conducted through ETP programmes, including a GBV Listening Exercise in Malawi's smallholder tea sector (2025) and research into unaddressed labour and human rights violations in Kenya's tea sector (2025). These initiatives help build shared understanding of SEAH risks, gaps and emerging good practices across tea supply chains, informing ongoing prevention, mitigation, response and remediation efforts across the industry.

Conclusion

Addressing SEAH in the tea sector is a complex challenge that requires sustained and coordinated action across multiple levels. The drivers of SEAH are deeply interconnected, and lasting systemic change requires sustained efforts to address unequal power dynamics between individuals, strengthen working and living environments, and address the wider supply chain, economic, legal, and socio-cultural factors that enable abuse and exploitation.

ETP remains firmly committed to supporting all efforts to address and prevent harm in the global tea supply chain. While progress has been made, significant challenges remain, and women working in the tea sector continue to face disproportionate risks of SEAH. Through locally-led programmes, partnerships with tea producer companies, cooperatives, and women's rights organisations, engagement with industry stakeholders, and the promotion of responsible business practices, ETP will continue to support prevention, mitigation, response, and access to remedy across the tea supply chain, convening and enabling stakeholders to drive collective action towards a tea sector where all workers and farmers can live and work with dignity, safety and respect.

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