

The Impact of the Responsible Jewellery Council's Code of Practice on Gender Equality



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Executive Summary

The RJC has been, and remains, committed to the UN Sustainable Development Goals (SDGs) and in particular SDG 5 – the empowerment of women and girls. In 2020, the RJC completed an SDG mapping and materiality assessment based on its COP to identify which of the 17 goals were of most relevance to the jewellery and watch value chain. The results identified SDG 5 as one of six priority SDGs for the industry. During 2020 and 2021, the RJC launched a series of guidance materials (including webinars, a gender equality report, and a toolkit) designed to promote gender equality across its membership of over 1,700 firms.

The RJC has developed a series of Code of Practices (COP) designed to improve sustainability standards of its members, some members are certified against the 2013 COP while others have successfully completed certification against the 2019 COP. While not a COP provision on its own, gender equality cuts across many of the 2019 COP provisions in areas such as general employment terms, working hours, remuneration, harassment, non-discrimination and health and safety.

The RJC requested Dr Lynda Lawson and Fitsum Weldegiorgis of the Sustainable Minerals Institute at the University of Queensland in Australia to investigate the outcome of the implementation of the 2019 COP update on improving gender equality across members compared with the 2013 COP.

In the first and second quarter of 2023, responses were received to an online survey distributed amongst RJC's full membership, which received responses from 55 RJC members (40 certified with COP 2019, 5 with COP 2013 and 10 who have no certification). Individual interviews were conducted virtually in English, French and Hindi with 9 companies certified with the COP 2019.

An analysis of the survey results using an Excel sheet and thematic analysis of interview transcripts found that most companies are committed to improving conditions and opportunities for women and this is true for 2019 certified, 2013 certified and those who are not certified. Members from all groups were proud to share the strong representation of women, with at least two female-owned and female-led firms brought to our attention in the online survey.

The findings from the survey and the interviews can be seen as encouraging enablers of gender equity in women and men's working lives in the industry. Our analysis found there were no significant differences in the responses of those who have no certification, 2013 certification and 2019 certification.

Further engagement is needed with the RJC gender equality materials (only 20% of the survey sample and only 12.5% of the interviewees had engaged with this). Some of the members who participated in this research (both 2013 and 2019 certified) expressed 'gender equity' as a better regarded term over 'gender equality' and many expressed strongly that what mattered were the skills of the employee not their gender. Different perspectives came from some Asian members who found it difficult to recruit women into roles such as complex manufacturing processes, filing, polishing and stone setting and management roles, which are more demanding, but which are likely to have better long-term prospects. This research uncovered many grassroots stories about women's empowerment such as women owned firms, ground up initiatives such as the Women's Circle of Diamonds in Antwerp and success stories such as the young mom in New York who completed her Doctor of Business Administration (DBA) with the company's support and is now a financial director.

Recommendations include making gender issues more visible in the COP documents and in questions asked by auditors. Comprehensive research focusing on gender across RJC members that differentiates between contexts and geographies as well as how different businesses operate is recommended.

1. Introduction

The Responsible Jewellery Council (RJC) is the world's leading standard-setting organisation for the jewellery and watch industry. Its vision is to create a responsible world-wide supply chain that promotes trust in the global fine jewellery and watch industry. The RJC Code of Practices (COP) is the global standard for the responsible jewellery and watch industry, focusing on business ethics and responsible supply chains. The COP covers all the primary minerals and metals used in the manufacture of jewellery: gold, silver, platinum group metals, diamonds, and coloured gemstones (emeralds, sapphires, and rubies).

The RJC COP defines the requirements for establishing responsible business practices throughout the jewellery supply chain, from mine to retail. The COP provides a common standard for ethical, social, human rights and environmental practices, and COP certification is mandatory for all RJC commercial members. The RJC COP certification can reduce risks and vulnerabilities in a company's supply chain and improve management systems and operating procedures to strengthen the business and make it more sustainable.

1.1. Gender in the jewellery business and the RJC's response

The jewellery business is a long-established industry with traditionally gendered segmentation- "men and women pool in different areas. The watch brands are traditionally very masculine, women are increasingly found in design, but few women are running the big global brands" (RJC Executive Director, April 2023 personal interview). Yet women are key across the entire jewellery value chain and dominate the global jewellery market accounting for 90% of demand (RJC Gender Toolkit for SMEs). It is therefore important that women are equitably involved in the business of jewellery sourcing, making, and trading. As Dr Gaetano Cavalieri, President of World Jewellery Confederation (CIBJO) highlighted ([RJC, Generation Equality - SDG 5 in Action](#)):

For time immemorial, jewellery has been designed and crafted to be worn by women. Therefore, it is doubly absurd and patriarchal that ours remains a business dominated by men. We are committed to working with the RJC toward the fulfillment of SDG 5 ensuring full gender parity in the jewellery industry in terms of salary, opportunity, and leadership.

Acknowledging that issues on equality are complex and deep-rooted, the RJC has taken the stance that business can play a critical role in changing attitudes, building responsible practices throughout the supply chain, and creating inclusive and safe work environments for everyone ([RJC, How RJC Promotes Gender Equality](#)). The RJC has adopted the United Nations Women's Empowerment Principles (WEPs) as part of its commitment to promoting gender equality and women's empowerment in the workplace, marketplace, and community to build awareness and prompt action amongst its members to address gender inequality in their business and supply chains via several supporting initiatives since 2020 (RJC, How RJC Promotes Gender Equality).

In 2021, Generation Equality – SDG 5 in Action was launched as an ongoing collaborative project between the RJC and a wide range of partners, such as Business for Social Responsibility (BSR) and CIBJO. Achievements include a platform for information sharing through a series of guidance documents, global and regional roundtables, workshops, and training sessions including the following:

- Gender equality workshops and webinars
- Gender equality newsletters
- Gender equality working group
- Gender equality member survey
- Gender equality report
- Gender equality toolkit for SMEs

1.2. Gender equality and the RJC's COP

The RJC believes that the certification process for the COP can provide a place for members to contribute to gender equality within their company. The RJC has integrated a gender lens to various provisions of the 2019 COP update and aims to create a business environment where all women are considered equal, setting standards for what equality should look like in the industry (RJC Gender Equality Report). There has been a deepening of focus on gender issues, the 2013 COP - Guidance referenced gender 26 times focussing on non-discrimination. The 2019 COP - Guidance references gender 62 times in a 337-page document, with practical approaches and specific guidance given in the RJC Gender Equality Toolkit. The [RJC Progress Report 2021](#) (page136) provides a chart outlining the gender dimensions of the following:

- COP 15 - General employment terms
- COP 16 – Working hours
- COP 17 – Remuneration
- COP 18 – Harassment, discipline, grievance procedures and non-retaliation
- COP 22 – Non-discrimination
- COP 23 – Health & Safety

2. Objectives

Against this backdrop, the RJC is seeking to evaluate the outcome of the implementation of the 2019 COP update on improving gender equality across members compared with the 2013 COP. The evaluation seeks to assess the extent to which the RJC's supporting initiatives have generated awareness and action on gender equality across the RJC membership and contributed to changes in members' practices. In line with ISEAL Requirements for Evaluations (research projects), the RJC is also committed to understanding any unintended consequences both positive and negative of the implementation of the COP. The evaluation is also alert to opportunities provided for women's learning and progression to champion the unique contribution woman can bring to this industry in line with the RJC's aim to *Create Beautiful*.

3. Work Program

3.1. Scope of work

The evaluation is focussed on companies in the mining, cutting, and polishing, manufacturing fora, and trading where female representation in the workforce is traditionally low.

The evaluation includes those who have recently transitioned from the 2013 COP, implemented the 2019 COP, and achieved certification in 2022. It was decided that data generated from this research would be aggregated and anonymised which will be helpful in creating the trust and confidence needed for the interview and survey to elicit valid and reliable data.

4. Research Methods

We used two research methods: individual interviews and an online survey. Given the global footprint of RJC members, this research took place remotely with interviews conducted on Zoom and an online survey of members using the RJC survey platform.

4.1. Sampling

The survey link was delivered to 2,052 email addresses including the principal contacts of all members, all RJC staff and the RJC board. A total of 55 responses were received including 40 from COP 2019, 5 from COP 2013, and 10 who had not completed any certification.

In terms of approaching potential participants for interviews, 36 survey respondents left their details to be contacted for an interview. All 2013 COP members were also invited for interviews. In total, 14 employees (6 male, 8 female) were interviewed from eight companies, and all were accredited with COP 2019. They included diamond merchants, watchmakers, and jewellery manufacturers. Those interviewed included company directors, sales staff, HR, and factory workers (See Appendix A for full details).

No members certified against 2013 were able to be interviewed except for a manufacturer in Mumbai that was in the process of acquiring their 2019 certification. Two other members interviewed had recently transitioned from the 2013 COP to the 2019 COP. The low uptake was due to there being a very small sample size of members who were still certified against the 2013 COP (48 in total). Most of these members were in the process of acquiring their 2019 certification and were busy with audit preparations. However, the quality of the interviews was exceptional with a full and frank sharing of information, opinions, and stories. There was a good range of industry occupations, and a good gender balance.

4.2. Individual interviews

The purpose of the individual interviews was to complement information drawn from the online survey and to provide an opportunity for open ended responses which could be probed for greater insights.

The questions were designed in collaboration with the RJC and were provided in English, French and Hindi. Dr Lynda Lawson, Fitsum Weldegiorgis and Dr Rana Sengupta (a UQ affiliate based in Rajasthan and Indian gender expert) conducted the interviews which lasted 15 to 30 minutes.

4.3. Online survey

The online survey was designed to obtain a significant sample of members' views on gender issues. Mostly multiple choice, there was also one open ended question which provided valuable candid comments especially from the COP 2013 group. See Appendix B for interview and survey questions.

5. Findings

This section provides a snapshot of progress in these companies towards gender balance and opportunities for women in line with SDG 5. It also raises areas that need further investigation. The results of the online survey are presented with illustrative comments and thoughts from the interviews.

5.1. Code of Practices and RJC forum membership

A total of 55 participants responded to the survey questionnaires, of which 40 (73%) are certified against COP 2019, 5 (9%) are certified against COP 2013 and 10 (18%) are not certified (Figure 1). 58% of respondents were jewellery and watch manufacturers and/or wholesalers, followed by diamond and coloured gemstone traders, cutters and/or polishers (16%), see Figure 2. There was a fairly well distributed representation of participants from across the various sizes of businesses, although slightly higher numbers were from medium (38%) and large (27%) scale businesses. Those who are certified against COP 2013 are jewellery and watch manufacturers and/or wholesalers (3) and Jewellery and watch retailers (2).

Which version of the COP are you currently certified against?

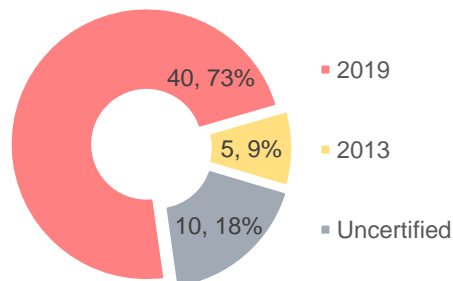


Figure 1. Number of survey participants by version of the COP (N= 55)

Which RJC forum do you belong to?

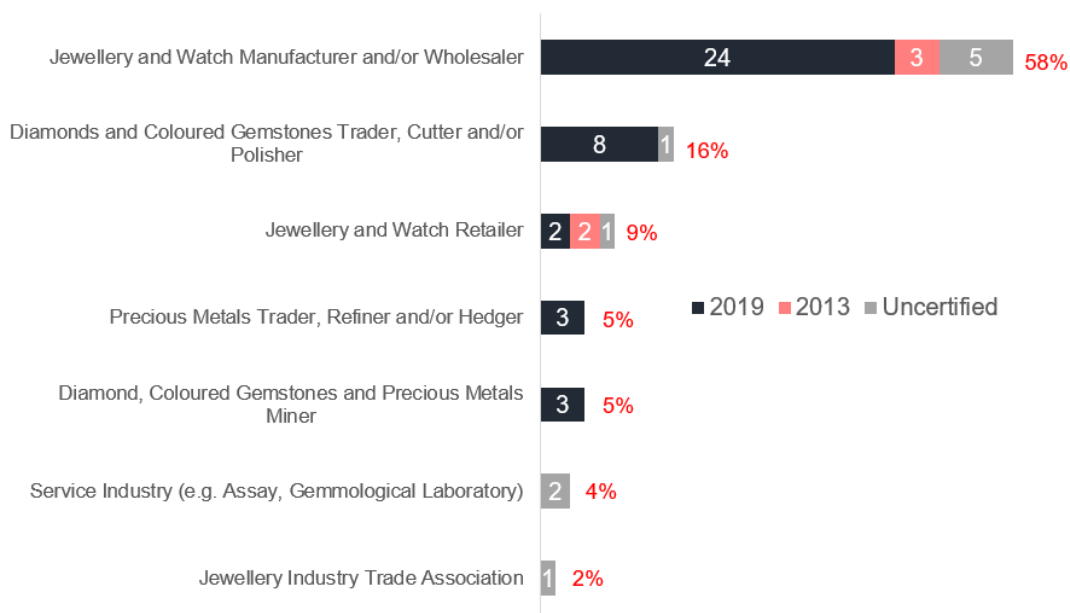


Figure 2. Number of survey participants by RJC forum type (N= 55)

5.2. Country of headquarters

As shown in Figure 3, the headquarters of survey participants are in 19 countries, with larger numbers of participants based in the United States (9), Switzerland (6), India (5), and the United Kingdom (5). Overall, representations from Europe, Americas, Asia, and Africa provides for analysis of progress in gender equality based on a good distribution of locations with cultural diversity.

What country is your organisation's headquarters located in?

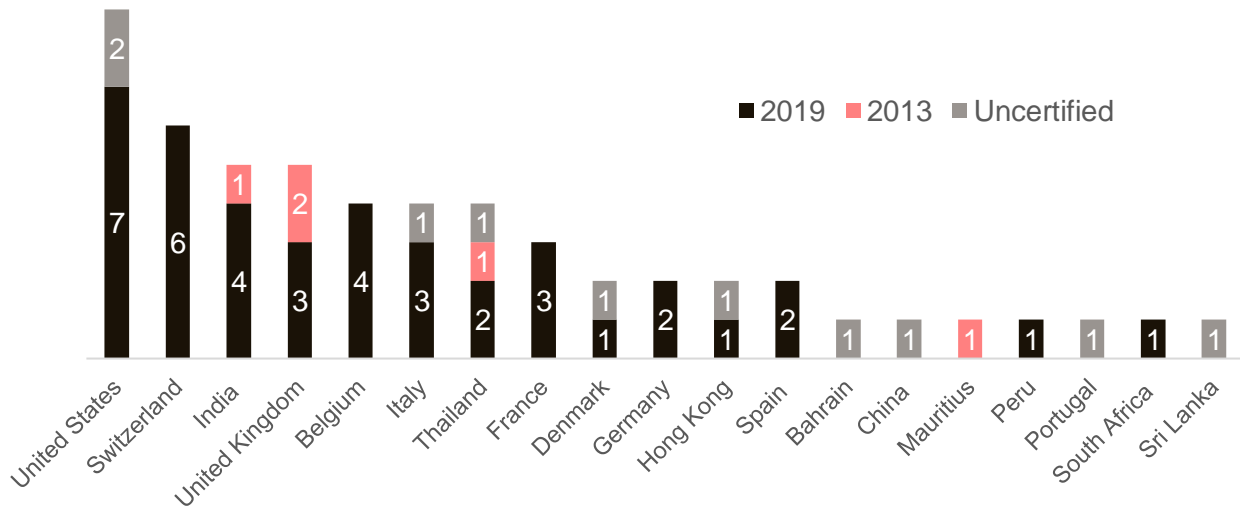


Figure 3. Number of survey participants by the headquarters of their organisations

Interviewees came from companies headquartered in a narrower range of countries: one company each from Belgium, the United Kingdom, Switzerland, Japan, Germany, and India; and two from the USA.

5.3. Engagement with RJC gender activity

According to Figure 4, 80% of survey respondents said they have not participated in any previous activities on gender equality. Of these, 73% are certified against COP 2019 and 9% against COP 2013, suggesting that there were not strong links between gender equality related activities and the practice which influence the achievement of certifications.

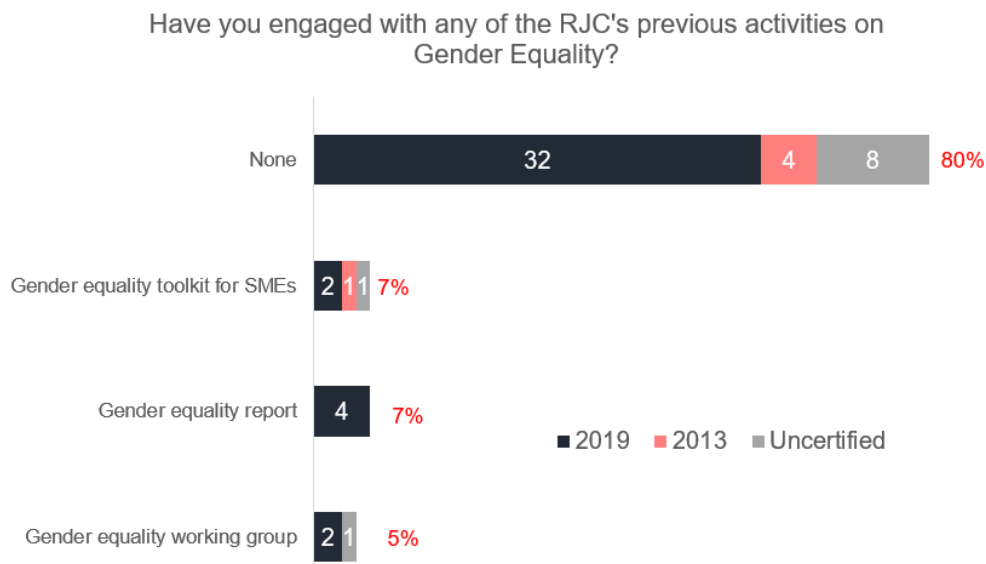


Figure 4. Number of survey participants by participation in any of the RJC's previous activities on gender equality (N=55)

Several interview participants also noted that they were not aware of any RJC activity with a specific focus on gender equality. It can also be said, based on most interviews, that companies either do not have or have only general guidelines or policies with a specific focus on gender equality. Some mentioned that the RJC audit activity did not include gender specific questions. Only 3 out of 12 interviewed were familiar with RJC's webinars materials and gender.

5.4. General employment terms

Most survey respondents (95%) confirmed that new employees receive employment terms and conditions in writing upon commencing employment. However, only 5% (3) of the survey respondents indicated that the terms and conditions contained any gender-specific clauses.

Upon further probing some interview participants pointed out that gender 'equity' is embedded in the general society in which they operate and so there is no need to have a special focus on gender equality in their standards of recruitment or practice. For example, an interview with a Japanese company highlighted that the fact that they have more females than males is not down to specific policy or RJC organised activities around gender equality. In fact, a number of those surveyed and interviewed are uncomfortable with the term 'gender equality' stressing that they don't like to differentiate employees by gender but by merit and qualifications.

"We need to be very careful about terminology, I much prefer the concept of gender equity than gender equality, gender equity can be applied more succinctly to a range of people. If we've got 60% or 70% women, it's equitable for our business." New York diamond jewellery manufacturer.

5.5. Working conditions

In terms of flexible working conditions, all except 3 (5%) of the survey respondents indicated that their organisations have policies and/or procedures in place to allow for flexible working conditions in one or more areas (Figure 5). While 25% of respondents said that employees can take days off for family reasons, another 25% said that employees can work part-time as well as taking days off for family reasons. Only 2% of survey respondents indicated that employees could do home-based work and have not selected the other working provisions. Another 11% said employees can work from home and have the right to take days off for family reasons. Many respondents (31%) indicated that employees are entitled to all the above working conditions. Some interviewees explained that it is not possible to work from home in some cases for example in diamond related companies. When differentiating between genders, 96% of respondents said that company policies remain the same for both male and female employees, while the remaining respondents were unsure about the question asking if their policy differentiates by gender.

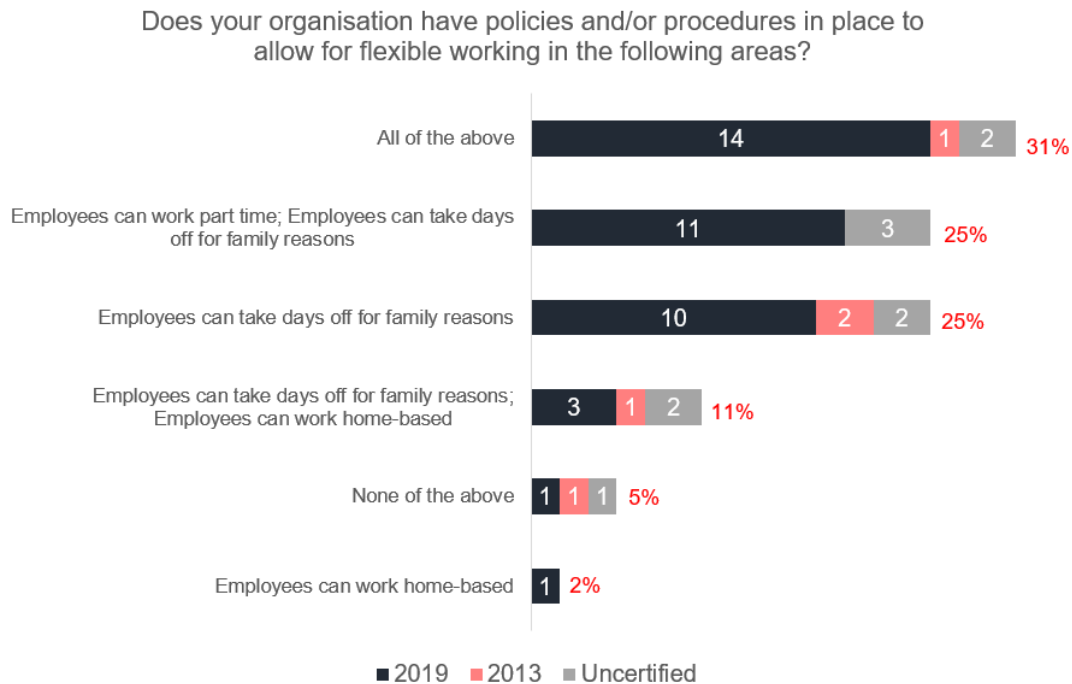


Figure 5. Number of survey participants by policies and procedures for flexible working conditions (N= 55)

In the interviews many mentioned that their companies were very flexible when it came to accommodating their carer’s responsibilities. Three of the companies interviewed (all in the diamond business) transitioned to a 4-day week during COVID with no regrets.

As a mom with an 11-year-old, having that little bit of extra time and flexibility makes a huge difference. So that’s beautiful. New York diamond jewellery manufacturer.

5.6. Maternity leave

Most survey respondents indicated that a worker has the right to maternity leave of more than 3 months (53%), followed by 36% of respondents confirming maternity leave of 1 to 3 months (Figure 6). The rest said that workers can have three weeks (2%) or less than three weeks (4%) of maternity leave, while 5% of respondents remained unsure. A good proportion of respondents (27%) said that workers can have paternity leave of three weeks, another 20% of respondents for 1 to 3 months and 11% for more than 3 months of paternity leave. 15% of respondents said they do not have paternity leave, while 20% were not sure.

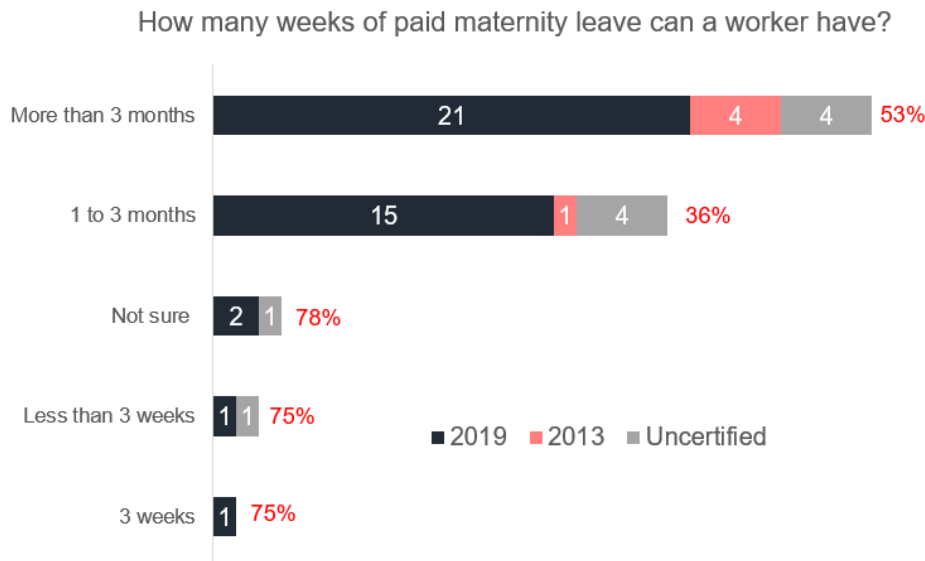


Figure 6. Number of survey participants by response on maternity leave

Those interviewed all said that maternity and paternity leave (family leave in New York State) was given in accordance with local law. Several interviewees mentioned that pregnant women were provided with extra leave days on top of this, with a Japanese firm giving an extra day off during pregnancy for each month of the pregnancy. In India a female doctor visits the factory every two weeks, there are also committees that monitor conditions for women’s comfort.

5.7. Public disclosure of gender gap in pay and mechanisms for grievance

When asked whether their company publicly discloses its gender pay gap data, respondents said either no (82%) or were not sure (18%). Most interviewees confirmed that their respective companies practice equal pay regardless of gender. This important question requires further research.

5.8. Monitoring satisfaction and dissatisfaction

Most respondents (91%) said that a clear procedure was in place for employees to report any instances of dissatisfaction in a confidential manner (Figure 7). As one interviewee mentioned:

We do have a special place where they (employees) can put complaints. Nobody used it. It's still a blank, but it's all based on our protocol, and it's also guided by our internal lawyer. -Antwerp diamond trader

While 80% of respondents indicated that their company monitors employee satisfaction, this is not the case for 11% of respondents and for the remaining 9% who remained unsure. Again, this may not necessarily mean that those who said their companies do not monitor are dissatisfied.

Does your company monitor employee satisfaction?
Any procedure for reporting dissatisfaction?

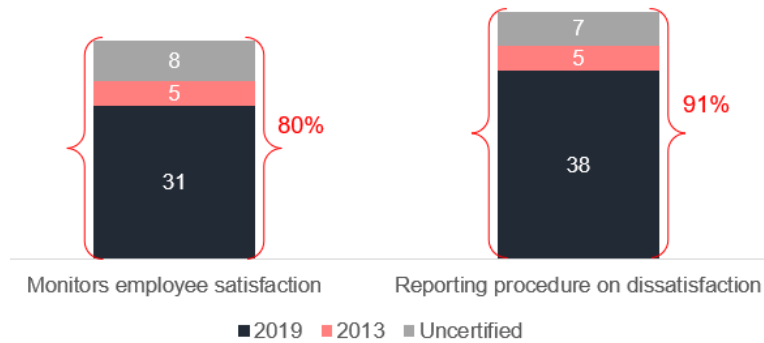


Figure 7. Number of survey responses on whether company monitors and has procedures for employees to report on dissatisfaction.

5.9. Policy and procedure relating to dignity, respect and harassment

Most of the survey respondents indicated that their company has a policy and/or procedure relating to dignity and respect (91%) and harassment (89%) in the workplace (Figure 8). According to 89% of respondents, most companies communicate policy on the disciplinary process and related standards to all management. Moreover, 93% of respondents said that employees can submit a grievance without suffering penalty of retaliation. For 80% of respondents, their companies have in place policy and management systems to avoid penalty or retaliation for someone who submits a grievance.

Does your company have a policy and/or procedure relating to dignity and respect or harassment in the workplace?

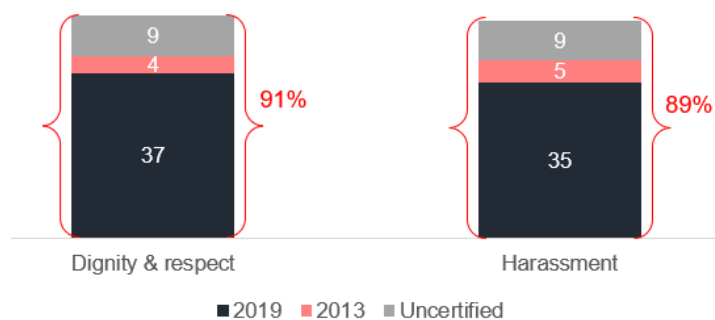


Figure 8. Number of survey responses on whether company has policy/procedure on dignity and respect, harassment

5.10. Gender based violence

While 56% of respondents said staff, including contractors, are trained to recognise gender-based violence in the workplace, this is not the case for 27% of respondents, with the remaining 16% being unsure (Figure 9). Many employees interviewed had taken annual mandatory training on sexual harassment. In New York, after a warning, a young factory worker was dismissed for persistent harassment of a colleague. In India, sexual harassment and most of the issues with gender are dealt with in male or female committees and these are audited. A manufacturer in Mumbai has the POSH Committee for the Prevention of Sexual Harassment with an NGO that works with sexual harassment. They have quarterly meetings and if anyone has a complaint, they attend that committee. A complaint of sexual harassment must be made in writing to the committee, counselling is given if they are not ready to do this.

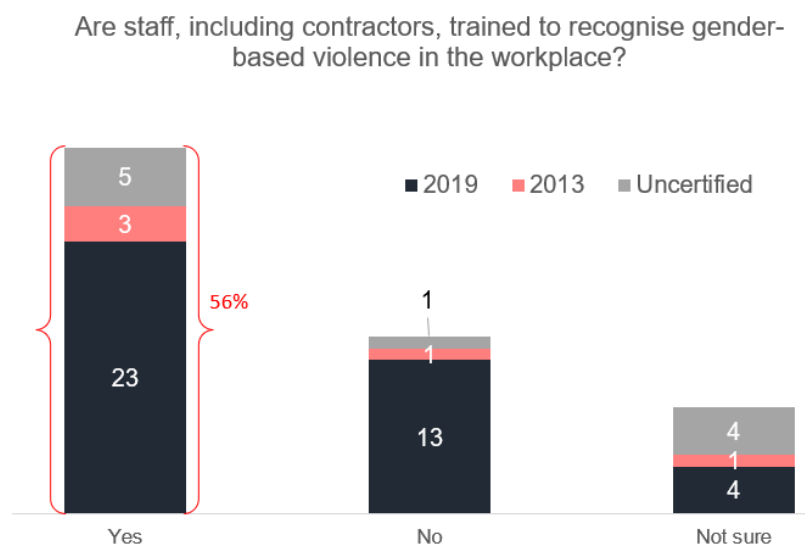


Figure 9. Number of survey responses on whether staff are trained to recognise gender-based violence in workplace

Although this member has just transitioned from COP 2013 to COP 2019 and is aware of the RJC’s gender equality material, they commented that committees like POSH “are practices they have had since the beginning itself and were established before the COP 2019”.

Those interviewed mentioned a male and female point person (usually in senior management) they could go to in case of a complaint. It should be noted that in a considerable number of interviews and comments in the survey, many companies consider themselves to be like a family, in some cases all female run. This creates a conducive and caring working environment and as such many participants said that there is no need for gender-based violence focussed activities.

5.11. Prevention of discrimination in hiring of workers

The survey results suggest that most (~80%) companies do have policies and/or procedures in place to prevent discrimination in the hiring of workers based on the different categories indicated in Figure 10. Only a few respondents indicated that their companies do not have such policies based on gender (15%), pregnancy status (22%), age (16%), marital status (22%), parental status (24%), disability (18%), and medical condition (20%). One firm mentioned that employing someone with a physical disability could be

challenging given the older, constrained spaces of many city factories and workbenches. However, most of those interviewed were keen to emphasise that they did not discriminate based on the above factors and what mattered was skill and potential.

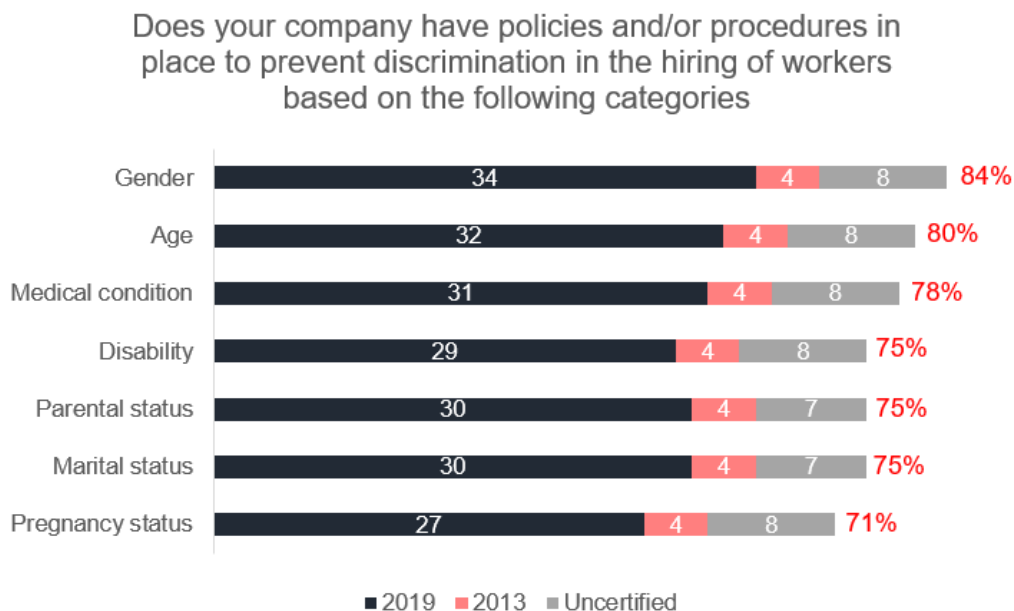


Figure 10. Number of 'yes' responses on whether companies have policies to prevent discrimination in hiring based on various areas

It just happened because we were looking for the best people we could find for the job, and we wanted to pay and retain the best people we had in the jobs, ...because we weren't thinking about gender issues, .. we ended up with a lot more women than men because they were doing a good job - New York diamond jewellery manufacturer.

We don't look at whether it's a man or women, we have no need to encourage women, we employ people based on their competence- Swiss watch manufacturer.

An interview with a jewellery manufacturer in India indicated that workers are recruited directly from training institutes, or the company takes 'raw' students from school irrespective of gender.

5.12. Gender specific jobs and training

In the Forums listed in Figure 2, most survey respondents indicated that they do not have gender-specific jobs (85%) or gender-specific training courses (89%), see Figure 11. A small number of respondents (4% of total) operate gender-specific jobs. Similarly, 4% of respondents said that their companies provide gender-specific training courses. Although this suggests that there are almost no gender designated jobs, a few trends can be observed from interviews. Many participants are keen to promote gender equity across the globe, but some challenges are encountered notably in Japan, India, and Sri Lanka. For example, a Japanese 2019 certified member indicated that while they have more female employees than male, their female employees are mainly engaged in office and sales roles and only 2 out of 8 women are managers. To address this gap, the company provides their female employees with seminars to raise their awareness and

capacity in managerial roles. The company’s president acknowledges the challenge the company faces in Japan in overcoming women’s reluctance to take on leadership roles.

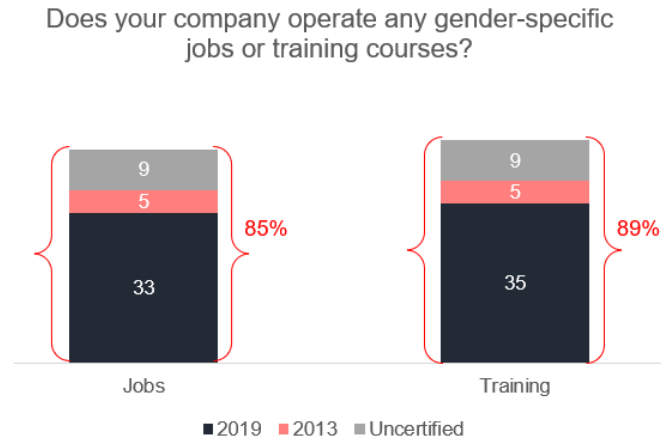


Figure 11. Number of ‘no’ responses on whether companies operate gender-specific jobs or training.

5.13. Gender-specific workplace facilities

In terms of gender-specific workplace facilities, 84% of survey respondents said that their employer provides separate toilets and washing facilities for men and women (Figure 12). Only 15% and 29% of respondents noted that their employer provides childcare facilities and breast-feeding facilities, respectively. Whereas 27% of respondents indicated that their companies provided separate PPEs for male and female employees, most respondents said that their respective companies do not provide PPE (36%) or that PPE was not applicable (36%).

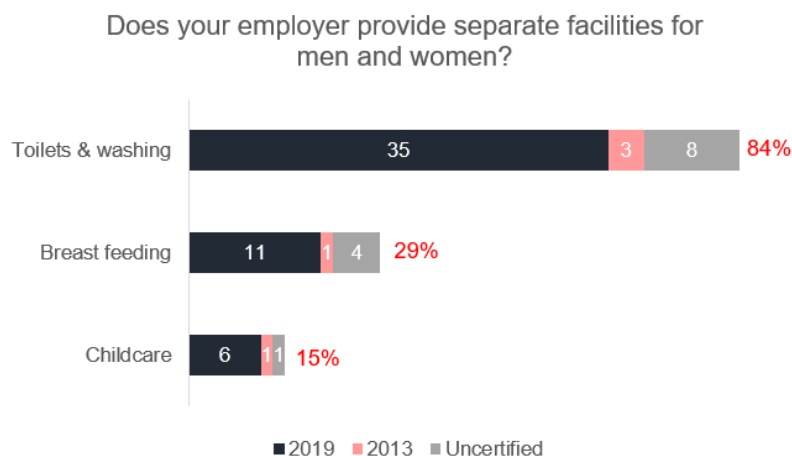


Figure 12. Number of ‘yes’ responses on whether employer provides separate facilities

All those interviewed said they had separate toilets for men and women and breast-feeding facilities if required. A room is provided for a female employee to express breast milk at a diamond firm in Antwerp. An initial problem was the lack of privacy given the high level of security cameras throughout the building. Children of employees at a jewellery manufacturer in India can access a creche in the Special Economic Zone for gems and jewellery established in Mumbai. Workers are illiterate and worried about their children’s

future and their exams. The company provides career counselling for their children at school to help them make good academic choices. Women are encouraged to get into social programs for entertainment cricket matches and yoga festivals.

An Antwerp diamond trader has established a training program in gem cutting for its female suppliers in India and has created a play area for children.

5.14. Restrictions on the work of pregnant women

From Figure 13, we can see that 42% of survey respondents indicated that there are formal restrictions on the work that pregnant women are permitted to do, while 45% said there were no restrictions. Such formal restrictions include the use of chemical products, heavy load lifting and manual work, work that involves dust, plating, polishing, the dangerous products workshop such as working with “specific materials (titanium) processes (black silver) and the casting goldsmith atelier”. In some contexts, such as Thailand, some businesses commented that they “follow Thai law regarding all permissions/restrictions for pregnant women, pregnant employees can request to change duties which are always granted”. Some businesses have restrictions that extend to 24 months after childbirth in which case work done by the childbearing women is restricted from heavy lifting and work involving chemicals.

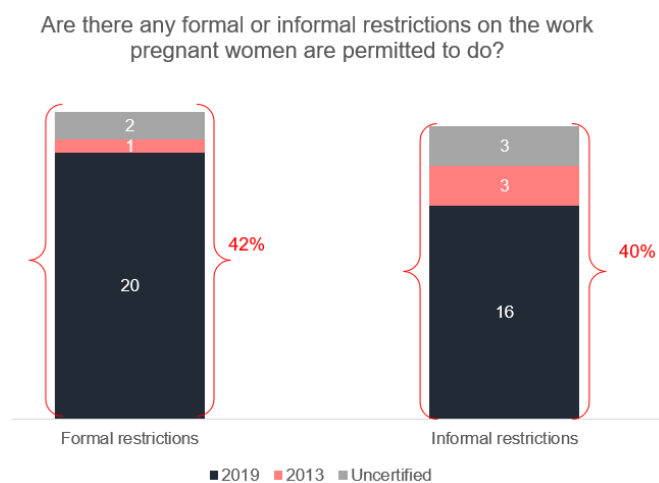


Figure 13. Number of 'yes' responses on whether there are formal or informal restrictions on the work pregnant women are permitted to do.

Forty percent of survey respondents said that there are informal restrictions on the work that pregnant women are permitted to do (Figure 13). In addition to some of those mentioned in the formal restrictions like heavy lifting and chemical use, informal restrictions mentioned include those related to standing for a long time, use of stairs, overtime work, and deliveries. One respondent noted that most of the work in the business does not have much risk for pregnant women. Others indicated that individual cases including pregnancy related difficulties are handled at the HR level.

The following section will draw together the results of the survey and interviews and reflect on what this means for the RJC and its COP in relation to gender equality.

6. Discussion

There is a good level of gender awareness across most members surveyed and interviewed.

Most companies are committed to improving conditions and opportunities for women and this is true for 2019 certified, 2013 certified and those who are not certified. Whether or not they have gone through the certification process, it is understood from their own cultural and institutional context and the communications with the RJC that improving gender equality is a major imperative. This awareness is true across the membership status.

This is reflected in the following comments.

A non-certified Sri Lankan firm working in diamond and coloured gemstone:

The subject of gender equality is a work in progress in our eyes.....work with respect to LGBT and Gender equality is something we have addressed and conducted workshops for the entire factory in this connection.

A 2013 certified Indian jewellery manufacturer:

While significant progress has been made in advancing gender equality, there are still areas that need to be progressed. We are working on our ways to increase the women's ratio in our organization. There are still some cultural & communal barriers to equality.

A 2019 certified Peruvian miner:

Our company needs to improve communication of its policy on Gender equality.

Varying levels of gender awareness and transformation.

Nevertheless, survey and interview comments reflect an industry with varying levels of gender awareness. This ranges from fairly neutral about gender where the problem of gender inequality is not acknowledged or verbalized to gender transformative where gains towards gender equality have systematic effects that are not easily reversible; new power dynamics are introduced that enable more gender equal outcomes¹. An example of this would be opportunities for Indian women to learn cutting and polishing skills through a school provided by an initiative sponsored by one Antwerp member and opportunities for young women to learn technical aspects of watch making, traditionally preserve for males in Switzerland.

Women's Circle of Diamonds – Antwerp

The diamond world is very masculine.
- 2019 certified RJC member

This group was created by a member of the RJC working for a diamantaire in Antwerp. She and a group of other women met socially and decided to create a support group for women working in diamonds in Antwerp. As women commercial and account managers they felt at a disadvantage because of the masculine nature of the business – they felt that women were seen as secretaries only. “Sometimes it seems like we have to do double the work to be heard”.

Through the *Women's Circle of Diamonds*, they share connections and approaches, they attend professional development and social events and regularly have breakfast and coffee together. Recently they have been invited to a trade event at the South African Embassy in Brussels, to talk about women's empowerment and diamonds. In this way, they will also be enlarging further their understanding of the diamond supply chain through networking with Africa.

¹ These terms are adapted from the gender analytical framework in *Evaluation of UNDP's Contribution to Gender Equality and Women's Empowerment*, UNDP, 2015. P. 46.

The Women's Circle of Diamonds is a particularly fine example of a gender transformative activity that has emerged from women deeply engaged in their professional context. Another powerful example of gender transformative activity is evidenced in the following Thai company.

Championing women in Thailand

(2019 certified RJC member)

This leading jewellery manufacturer in Thailand has five senior women on its board. It employs over 4,000 workers; 80 percent are women. Women work in almost all areas including workshop management and cutting and are especially good at pre-finishing and fine delicate work, plating, and quality control, while men tend to do heavy machine work, making moulds, casting, and cutting stones. About 60 percent of its designers are women. Every year the company sponsors young women from the northeast and hill tribe areas, a three-year diploma programme which is part of the Thai Royal Princess programme. The company provides pastoral care and the education for the enrolled students. At the end of the programme as many as 70 percent are retained as skilled workers at the company. Care has been taken to make the factory an attractive place to work with plants on the benches, music, and exercise, there is also a crèche, a nursing room, meals and accommodation for the workers, health insurance, and incentives for long service. More than half the staff has worked there for over 10 years. For example, one female worker comes from Bangkok and has been working in stone-setting for 30 years, since the age of fifteen. Today, she is one of the three stone-setting workshop supervisors, the other two being male. She comments:

Men are equal to women, for example, we can both be supervisors. It can be a difficult job, but I will teach them. I am very proud to have been able to support my family through my job (cited in Lawson, 2020)

Engagement with RJC material.

A greater level of engagement is needed with the very rich array of gender equality materials available to RJC members in the form of reports, toolkits, and the webinars. This could be because much of the material was launched during Covid-19 when not everyone was able to access their work computers. Several members mentioned they had little time left for further engagement after completing paperwork associated with the 2019 certification process.

An example of a possible unintended consequence of the RJC work on gender is that, in some of the interviews and comments in the survey, there is evidence of some resistance to the prominence given to gender equality issues by the RJC. This occurred in both COP 2013 and 2019 certified members. with the viewpoint that gender in their industry was not needed – that all that mattered were the person's skills. When asked whether they had engaged with the RJC materials, the reply from a COP 2019 certified member was:

"We are not concerned with this if it's a man or a woman it's just their competence that counts".

There was also a reflection from some respondents that the gender equality material had been distributed without acknowledgement of geographic and cultural differences. One member said: *"I know a number of jewellery manufacturers in India and Thailand that have up to 90% women on their staffs. These companies need to be recognized and saluted to move the needle on the whole industry".*

The terminology around gender was debated, with several members noting that 'gender equity' would be a better term than 'gender equality'. Some interpret the term 'gender equality' literally, understanding this to mean that the company must have exactly the same number of men and women on its workforce. From this survey, it is clear that women are prominent in many contexts and several companies are led by women and have female staff. Critics asked whether gender equality would mean those women would lose their jobs to ensure men and women's roles are equally distributed. As one COP 2019 certified respondent who had engaged with the Gender Equality Report commented in the survey:

More than 80% of our employees are women; 62.5% of senior management are women. You need a category for over achievers. A gender equality plan might require us to fire women and hire more men. I do not think you want that...

Empowering women to take on new roles: a mixed picture.

There are promising examples of women particularly in the USA and Europe taking up opportunities in management, non-traditional and specialist roles. A Swiss watch maker has noted an increasing number of women applying for technical watch work in spontaneous applications to the factory. This same factory has been flexible in its approach to its staff roles. As technology advances, more women can do “men’s work”.

We taught one of the ladies who was doing assembly how to do the finish and polishing, and she is now doing a job that is typically a male job. A male who was doing the finish wanted to do the assembly, so he changed to that. Everyone is on the same equal footing. If there is a challenge it is for everyone the same. – Swiss watch manufacturer

Several firms interviewed encourage and pay for staff to do further study such as the GIA diamond courses. This has opened up new roles for women. One young female manager was supported to complete a Doctor of Business Administration with a major in finance – she now has a better paid position in her company.

However, as has been observed in other research (Lawson, 2022), some women in the industry self-sabotage by being reluctant to take on roles which are more demanding, but which are likely to have better long-term prospects. This issue is mentioned by both COP 2013 and 2019 certified companies and seems to be more related to cultural background than certification. The following comment from a 2019 certified Indian jewellery manufacturer illustrates this behaviour:

Managing a manufacturing unit, it is my observation that not many female workers are engaged in core processes like Filing, Polishing, Stone Setting. Our major manpower is in these departments, but it is very difficult to find any willing female employees for these jobs. We have tried employing and training, but they always prefer other departments such as waxing, quality checking etc.

Similarly, while many women work for a COP 2019 certified Japanese jewellery manufacturer, the company struggles to recruit women into management despite offering women leadership and management seminars. Technology could open more opportunities for women to take on more skilled roles in the industry but only if they have the confidence and feel culturally comfortable to apply.

Careful institutional work is required to encourage and empower women to take on more skilled roles and to move this issue forward particularly in Asia.

Enablers of gender equity and concerns in relation to COPs.

Findings from the survey and the interviews can be seen as encouraging enablers of gender equity in women and men’s working lives in the industry but with some areas that need improvement.

There is evidence of flexible working conditions enabling staff to balance work and family commitment and generous provisions for maternity/family leave that go above and beyond legal requirements (COP 16). In relation to discrimination and the hiring process (COP 17), the majority of those surveyed responded that there were measures in place to prevent discrimination in hiring based on parental or pregnancy status (COP 17). This needs to be further investigated to determine if discrimination based on gender is occurring. In relation to COP 19 (Harassment, discipline, grievance procedures and non-retaliation) almost all members have clear procedures in place; however, 44% of the survey sample did not know about training to recognise gender-based violence particularly among contractors. In relation to gender-specific workplace facilities (COP 23), 84% of the sample provide separate toilets and washing facilities for men and women. Only a small number of survey respondents noted that their employer provides childcare and breast-feeding facilities. It would be worth probing issues around reporting of any gender pay gap as most firms surveyed did not do this.

Limitation: A limitation of the research was the reluctance of COP 2013 certified members to be interviewed. Perhaps this is due to reservations some may have about the broader concept of gender equality and the unintended consequence of the RJC's gender campaign. Or perhaps they were fearful of an audit like scrutiny of their practice. Further, there was a limited sample size of 2013 COP certified members as the majority of RJC's membership have been audited against the more recent 2019 COP.

7. Recommendations

The following recommendations are presented as suggestions based on our experience and the results of this research. Further research and work with stakeholders would be needed to fully implement these ideas.

1. Gender in the Code of Practices

At present gender is conceived as a cross cutting theme across the Code of Practices. Although a table of COPs and gender dimensions is given, it might be clearer to reconsider the presentation of gender issues in relation to the Code of Practices to make it simpler to quickly capture key points.

Simple steps should include making sure each company records how many employees it has and the number of men and women in different roles.

A simple question could be included: what impact will this action have for women in my company?

Auditors need to consider gender issues more directly. Members mentioned that auditors did not always address gender issues.

2. The Gender Equality Toolkit for SMEs

The RJC Gender Equality Toolkit is comprehensive and thoughtfully designed but needs to be further utilised by RJC members. The details need to be unpacked with workers and adapted to specific contexts.

A clear explanation of gender-based terminology (such as gender equality, gender equity and empowerment) is required.

3. Tell the Stories

Approaches which involve and are driven by employees, with their own stories and in their own language are more likely to succeed in communicating best practice. There are many stories implicit in the findings of this research that it would be good to see captured in short videos on the website. For example:

- Women owned firms such as this one:
Our company is owned and managed by a woman, so all issues regarding gender equality are thoughtfully considered, discrimination of any type is not allowed, and women's issues are suitably addressed for everyone's wellbeing.
- Ground up initiatives such as the Women's Circle of Diamonds – Antwerp
- Success stories such as the young mom in New York who completed her DBA and is now a financial director.

It would also be possible to encourage regional sharing of progress through member driven forums where different contexts can be shared and understood, and success stories celebrated.

4. Follow-up

Comprehensive research focusing on gender across RJC members is recommended. According to one of the interviewees, more in-depth research is needed that differentiates between contexts and geographies as well as how different businesses conduct their businesses and what kind of working environment and culture, they are situated in. Not enough time has lapsed in order to note significant changes in the data. However, it is encouraging to see that the majority of respondents have policies and procedures in place.

8. Acknowledgements

The researchers would especially like to thank those who participated in both the online survey and those who generously gave of their time to be interviewed.

Thanks also to Melanie Grant, Executive Director of the RJC, for making time for us to interview her and learn more about the broader context of the gender debate.

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Appendix A. Details of interviewees (N=17)

Company and certification	Forum	Location	Gender	Role in company	Employees Male and female
El-Ran Diamonds 2019	Diamond trade, in house laboratory and certification of authenticity and traceability	Antwerp	Male	Owner	10: 7 women 3 men 70% female
El-Ran Diamonds 2019		Antwerp	Female	Account manager gemmologist	
Eloquence Corporation 2019	Diamond and jewellery manufacturer	New York	Male	Company Director	27: 20 women 7 men 74% female
Eloquence Corporation 2019		New York	Female	Finance Manager	
ABProduct 2019	Watch makers	Switzerland	Female	HR	23: 17 men 6 women 26% female
ABProduct 2019		Switzerland	Male	Technical Manager	
Novell Enterprises 2019	Wedding jewellery manufacture	New Jersey	Female	Account manager Head of CAD	54: 30 men 24 women 44% female
Clark Diamonds 2019	Diamond trader	Birmingham	Male	Owner	15: 7 men 8 women 53% female
Fine Jewellery 2019 certified in April 2023	Jewellery manufacture	Mumbai	Female	HR	515: 382 men 133 women 26% female
Fine Jewellery 2019 certified in April 2023		Mumbai	Female	Company secretary	
Fine Jewellery 2019 certified in April 2023		Mumbai	Male	Laser operator on factory floor	
Fine Jewellery 2019 certified in April 2023		Mumbai	Female	Quality Control	
Nagasaki Corporation 2019	Silver and gold manufacturing	Japan	Male	Company Director	316: 197 women 119 men 62% female
Nagasaki Corporation 2019		Japan	Female	Overseas Sales	
Aharon Gul 2019	Diamond trade	Germany	Male	Owner and General Manager	18: 11 women 7 men 39% female
Aharon Gul 2019		Germany	Female	Office assistant	
Pranda Group	All aspects of jewellery manufacture and trade	Thailand	Female	Vice Chairman of Advisory Board	Over 4,000 employees 80% are female

Appendix B. Survey and Interview questions

Questions for Online Survey

About your organisation

1. Which RJC forum do you belong to?

- Diamond, Coloured Gemstones and Precious Metals Miner
- Precious Metals Trader, Refiner and/or Hedger
- Diamonds and Coloured Gemstones Trader, Cutter and/or Polisher
- Jewellery and Watch Manufacturer and/or Wholesaler
- Jewellery and Watch Retailer
- Service Industry
- Jewellery Industry Trade Association
- Other

2. How many employees are in your organisation?

- Small (1 to 9 employees)
- Medium (9 to 49 employees)
- Large (50 to 249 employees)
- X Large (250 employees or more)

3. Which country is your organisation located in?
4. Which version of the COP are you currently certified against?
 - 2013
 - 2019
5. Have you engaged with any of the RJC's previous activities on Gender Equality? Please tick all that apply:
 - Gender Equality Working Group
 - European Roundtable
 - Asia Roundtable
 - North American Roundtable
 - Africa Roundtable
 - Gender Equality Report
 - Gender Equality Toolkit for SMEs

COP 15 General Employment Terms

6. When a new employee joins your company, do they receive the employment terms and conditions in writing?
 - Yes
 - No
 - Not sure
7. Are there any gender-specific clauses contained within the terms and conditions?
 - Yes
 - No
 - Not sure

COP 16 Working Hours

8. Does your organisation have policies and/or procedures in place to allow for flexible working in the following areas?
Tick all that are applicable.
 - Employees can work part time
 - Employees can take days off for family reasons
 - Employees can work home-based
 - All of the above
 - None of the above
9. Do your company policies differ for male/female employees or remain the same?
 - They differ
 - They remain the same
 - Not sure
 - Other
10. How many weeks of paid maternity leave can a worked have?
 - No maternity leave
 - Less than 3 weeks
 - 3 weeks
 - 1 to 3 months
 - More than 3 months
 - Not sure
11. How many weeks of paid paternity leave can a worker have?
 - No paternity leave
 - Less than 3 weeks
 - 3 weeks
 - 1 to 3 months
 - More than 3 months
 - Not sure

COP 17 Remuneration

12. Does your company publicly disclose its gender pay gap data?

- Yes
- No
- Not sure

13. If yes, please provide a link to the report or webpage.

14. Does your employer use 'piece work'? (Piece work or output work is when employees are paid a fixed rate per task performed or unit produced).

- Yes
- No
- Not sure

COP 18 Harassment, discipline, grievance procedures and non-retaliation

15. Does your company monitor employee satisfaction? (For example, through annual surveys, one to one interviews etc)

- Yes
- No
- Not sure

16. Is there a clear procedure in place whereby employees can report any instances of dissatisfaction in a confidential manner?

- Yes
- No
- Not sure

17. Does your company have a policy and/or procedure relating to dignity and respect in the workplace?

- Yes
- No
- Not sure

18. Does your company have a policy and/or procedure relating to harassment in the workplace?

- Yes
- No
- Not sure

19. Are staff, including contractors, trained to recognise gender-based violence in the workplace?

- Yes
- No
- Not sure

20. Does your company clearly communicate its policy on the disciplinary process and related standards to all management?

- Yes
- No
- Not sure

21. Is it possible for an employee to submit a grievance without suffering penalty or retaliation?

- Yes
- No
- Not sure

22. Does your company have in place policy and management systems to avoid penalty or retaliation for someone who submits a grievance?

- Yes
- No

- Not sure

COP 22 Non-discrimination

Does your company have policies and/or procedures in place to prevent discrimination in the hiring of workers based on the following categories:

23. Gender

- Yes
- No
- Not sure

24. Pregnancy status

- Yes
- No
- Not sure

25. Age

- Yes
- No
- Not sure

26. Marital status

- Yes
- No
- Not sure

27. Parental status

- Yes
- No
- Not sure

28. Disability

- Yes
- No
- Not sure

29. Medical condition

- Yes
- No
- Not sure

30. Does your company operate any gender-specific jobs?

- Yes
- No
- Not sure

31. Does your company operate any gender-specific training courses?

- Yes
- No
- Not sure

32. Does your company operate any gender-specific promotional opportunities?

- Yes
- No
- Not sure

COP 23 Health and Safety

In the factory, corporate office facilities, and in any on-site housing:

33. Does your employer provide separate toilets and washing facilities for men and women?

- Yes
- No
- Only at certain facilities

34. Does your employer provide childcare facilities?

- Yes
- No
- Not sure

35. Does your employer provide breast feeding facilities?

- Yes
- No
- Not sure

36. Are there any **formal** restrictions on the work that pregnant women are permitted to do? For example, are there certain activities that the company prohibits pregnant women from undertaking such as working with particular chemicals or heavy manual work?

- Yes
- No
- Not sure

37. Please give an example if you answered yes to the question above.

38. Are there any **informal** restrictions on the work pregnant women are permitted to do? For example, are there certain activities that the company discourages pregnant women from doing such as standing for long periods of time?

- Yes
- No
- Not sure

39. Please give an example if you answered yes to the questions above.

40. Does the company provide separate PPE for male and female employees?

- Yes
- No
- Not applicable – the company does not use PPE.

41. Please add any thoughts about changes in relation to gender equality and any areas that still need to be progressed.

Questions for Individual Interviews

Interview Questions – Evaluation of RJC’s COP on Gender Equality

We very much appreciate you taking part in our research. From time to time, the RJC shares details our research projects in our newsletters and/or social media. This is to demonstrate the commitment of our participating members and to increase their company visibility. Would you like the RJC to name your organisation as an active participant in this research in our communication channels? (Please note – only the company name will be shared. Data and individual responses will remain anonymous).

- Yes – Please include my organisation as a listed participant for this research.
- No – I would like my organisation’s participation to remain anonymous.

Company Information

Company Name:

Country:

Which forum does your company belong to?

- Mining of diamonds, coloured gemstones, or precious metals

- Trading, cutting and/or polishing of diamonds and/or coloured gemstones.
- Manufacture and/or wholesale of jewellery and watches

Which version of the COP are you certified against?

- COP 2013
- COP 2019

The Interviewer will explain the purpose of the interview and then ask the following questions.

1. In your company, what is the total number of men and women employees?
 - a. How many women are employed on casual (by the day) and/or short-term contracts (for a fixed number of months)?
 - b. How many men are employed on casual (by the day) and/or short-term contracts (for a fixed number of months)?
2. To what extent have the RJC's supporting initiatives, for example the webinars, generated awareness on gender equality across RJC membership? Can you give examples?
3. In which of the following areas has your company improved women's working conditions?
 - General employment terms and conditions
 - Working hours
 - Remuneration
 - Non-discrimination
 - Harassment, discipline
 - Health & Safety
 - a. Tell us more about the most improved area. What contributed to this change? Which initiatives/ incentives have been successful in advancing women's learning and progression? Why?
 - b. Tell us about the least improved area. What have been the challenges?
 - c. Can you share if there are issues women face in terms of workplace harassment or discrimination? If yes, please outline.
4. Can you think of any 'unintended consequences' both positive and negative in the implementation of the COP for gender equality?
5. What are the challenges in transitioning from COP 2013 to COP 2019? How can these challenges be addressed?
6. Do you think the adoption of standards for gender equality in the updated COP 2019 could have been done differently? How? How does a COP 2013 articulate to COP 2019?
7. What is your opinion about your organisation's policy and/or procedure relating to dignity and respect for women? Do you have confidence that these procedures are effectively applied and monitored?

Appendix C. Researcher Profiles

Dr Lynda Lawson and Fitsum Weldegiorgis were responsible for the delivery of the project outcomes.

Dr Lynda Lawson

Summary

Lynda is a Senior Research Fellow in the Development Minerals program at the Sustainable Minerals Institute. Her research interests include small scale mining, supply chains for gemstones and opportunities for gender equity. Her PhD awarded in 2020, examined Opportunities and challenges for women's empowerment in the gemstone value chain in Madagascar and Thailand. She has conducted gender related research into the Thai jewellery industry conducting in depth interviews and observations at major Thai jewellers and trade centres (Lawson, 2022, 2019). She also conducted research into the health and safety of gemstone cutters in Jaipur (Lawson, 2022). She led a 5-year project in Madagascar to strengthen the work of women in the gemstone supply funded by Tiffany and Co Foundation and the German and Australian governments. Her gender work includes a full gender impact assessment for an Australian mining company in Madagascar and publications such as *The Australian Gemmologist Women's work in the gemstone supply chain: Africa, India and Thailand*. Lynda is an expert on the role of women in the gemstone supply chain and she has conducted field research on this topic in Malawi, Tanzania, Madagascar, India and Thailand. She is a founding member of the [Gemstone and Sustainable Development Knowledge Hub](#). Her PhD thesis examined *Opportunities and challenges for women's empowerment in the gemstone value chain in Madagascar and Thailand* and was conferred by The University of Queensland in 2020.

Her special interest is in Madagascar and Thailand where her work has focused on remote and vulnerable populations, particularly female gemstone miners. She has designed materials and led field training for these women. Her recent work has been in analysing gender in global value chains and the potential for ecosystems and knowledge spillover in supply chains. She is committed to ensuring that these types of developments include opportunities for women and youth.

Lynda is also an internationally recognised training specialist focussed on adult learning pedagogy and train the trainer approaches. She is committed to a learning approach that is gender inclusive and facilitates maximum knowledge transfer among participants and back in their places of work. Lynda has extensive experience in Africa, having led training programs in 13 different countries.

Selected Projects

Base Toliara minerals sands project, Madagascar

- Gender impact assessment researcher, 2019
- Base Toliara (An Australian listed mining company) is developing a mineral sands (ilmenite, zircon and rutile) project in a complex greenfield site in Southwest Madagascar. Lynda designed and led a pre-construction gender impact assessment for Base Toliara across six impacted areas.

Development of knowledge hub for sustainable development of coloured gemstones

- Senior researcher, 2017 – 2019
- Funded by Tiffany and Co Foundation, this multi-sectoral research project aimed to improve the sustainability and conditions of those working in the coloured gemstone supply chain in Madagascar, Thailand, and India. Lynda designed and delivered training materials, including a series [of videos](#).

Developing a gender inclusive vision for mining in Southwest Madagascar

- Senior researcher, 2016 – 2020
- In partnership with GIZ, this project developed a gender-inclusive vision for large and small-scale mining in south-west Madagascar. The work provided GIZ with a better understanding of the sapphire value chain and opportunities for women; as well as establishing international partnerships to enable women's empowerment.

Delve Exchange: global network of ASM miners 2021 to present

- Lynda has designed the communication and learning process and project managed the Delve Exchange for the World Bank since 2021. It now has over 1000 members in 59 countries and is a platform for peer exchange between small scale miners in particular women in mining associations.

Selected Publications

- Lawson, L & Malik, O. 2022. The India-WHWHB Experience: Processing of coloured gemstones in Jaipur - a collaborative approach to worker health education. *Safety and health at work*, 2022-01, Vol.13, p.S84-S85
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Fitsum Weldegiorgis

Summary

Fitsum is an economist and social scientist interested in sustainable human development effects of economic activities including those related to extractive resources, infrastructure, and industrial development. He has a well-established reputation in researching and providing training related to gender and mining.

He is experienced in applying socio-economic theory and modelling to design and advance strategies and policies and improve practices. As well as analysing socio-economic impacts; economic linkages and structural transformation; and resource governance, transparency, and management. He has a long track record of professional experience across government, academia, development organisations, and consultancy. Global work experience in countries like Australia, Chile, Eritrea, Ethiopia, Ghana, Kenya, Madagascar, Nigeria, Rwanda, Solomon Islands, South Africa, Sudan, Tanzania, and UK. He has field experience in more than 25 mining and energy sites internationally.

Expertise & Skills

- Applied and academic research, socio-economic and environmental impact assessment, performance analysis & monitoring notably considering gendered impacts.
- Economic modelling and policy advice; strategic design and planning
- Process-based and action-oriented multi-stakeholder dialogue
- Engagement and communication with broad spectrum of stakeholders including vulnerable communities.
- Capacity building (workshops, facilitations, presentations, lectures, training and short courses)
- Project management and implementation; technical proposal development

Selected Project Experience

- *Women and the Mine of the Future Project: A gendered analysis of employment and skills in the large-scale mining sector. Baseline study* Australia, Ghana (International Institute for Sustainable Development (IISD) – IGF)
- *Global ASM research and engagement programme – including a gender focus* (The Tiffany & Co. Foundation, IISD (IGF), SWISSAID, The Ford Foundation, DFID, GIZ)
- *Short course: Inaugural Global Women in Mining (WIM) Summit by IWIM (2021, Online)*. Main project features: Workshop to better understand the needs of WIM organisations in terms of their provision of services to their members who are engaged with/in ASM. Focusing on Africa and Asia, I developed workshop facilitation plan and led facilitation, as well as supporting the design of pre-workshop questionnaires. I identified and helped prepare WIM organisations in different countries to share their country-based learning by showcasing good practices and challenges.

Pertinent Publication

- [Women in ASM Challenges and Opportunities for Participation \(IGF\)](#) publication with Dr Lawson.



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