



# NAVIGATING GRIEVANCE MECHANISMS: A PATHWAY TO ROBUST ACCOUNTABILITY FOR RIGHTSHOLDERS

**EXECUTIVE SUMMARY**

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Companies are increasingly expected to establish grievance mechanisms as a core component of robust human rights and environmental due diligence (HREDD), yet many systems remain compliance driven and ineffective in delivering remedy. This briefing for business provides practical guidance on how to design and implement effective, people centered grievance mechanisms aligned with the UN Guiding Principles on Business and Human Rights and emerging regulatory expectations. It highlights the importance of a grievance ecosystem that connects operational level, brand level, and multi stakeholder mechanisms, showing how these layers can work together to strengthen accountability, identify risks early, and enable meaningful remedy across operations and supply chains.

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For further information on the issues raised in this paper, please email [advocacy@oxfaminternational.org](mailto:advocacy@oxfaminternational.org).

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# EXECUTIVE SUMMARY

The UN Guiding Principles on Business and Human Rights (UNGPs), along with emerging due diligence laws, make clear that companies have a responsibility to ensure access to remedy through effective grievance mechanisms that are accessible, trusted, and rights compatible. Yet in practice, many mechanisms remain compliance-driven, poorly designed, and disconnected from rightsholders, limiting both their use and impact. This briefing provides practical guidance for companies on how to design and implement effective grievance mechanisms as a core component of human rights and environmental due diligence (HREDD).

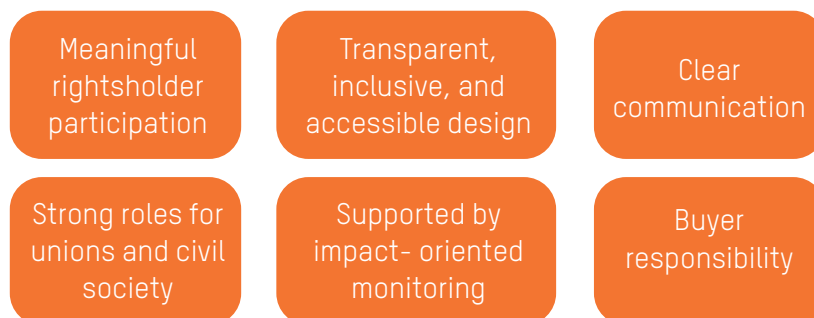
This paper argues that fulfilling companies' responsibility to provide access to remedy requires a shift toward **people-centered grievance systems** that are codesigned with those most affected, alongside a **layered grievance ecosystem** that connects operational, brand, and multistakeholder mechanisms. Each level plays a complementary role in addressing harms, from site-level issues to systemic risks, while clear escalation pathways between them help ensure that concerns surface early, are handled at the appropriate level, and lead to meaningful remedy and lasting systemic change.

After a brief introduction that previews the argument and describes the methodology, the paper is structured in four parts:

## 1. REFRAMING GRIEVANCE MECHANISMS AS PEOPLE-CENTERED SYSTEMS

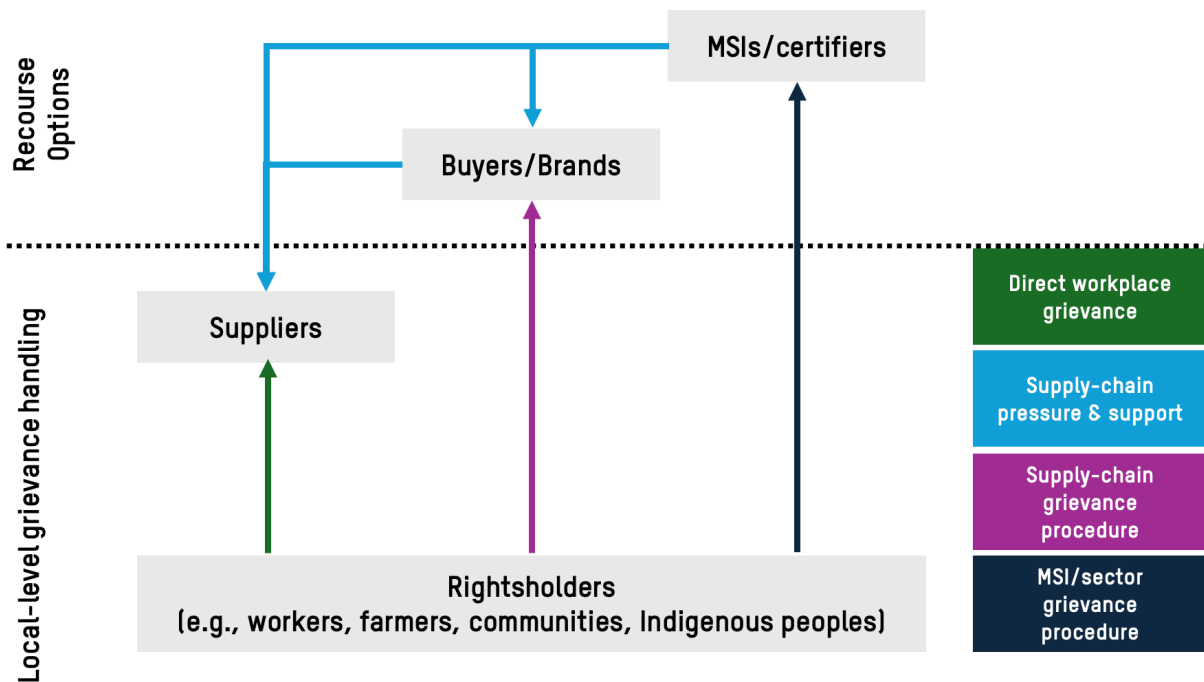
Grievance mechanisms often fall short because they are treated as compliance-driven tools rather than rights-based systems for remedy, and because rightsholders are not meaningfully involved in their design or operation. A narrow focus on metrics and case closure overlooks whether remedies are fair, timely, and address root causes, while fragmented systems and weak learning processes limit effectiveness. Limited rightsholder participation further undermines accessibility, trust, and relevance, particularly for those most at risk.

Reframing grievance mechanisms as people-centered systems requires grounding them in:



## 2. NAVIGATING THE APPROACH: TYPOLOGY OF GRIEVANCE MECHANISMS AND GOOD PRACTICE

Grievance mechanisms operate across multiple levels within and beyond a company's operations. Across all levels, the briefing highlights a consistent implementation gap: mechanisms often remain compliance-driven, fragmented, and underused, facing common barriers such as limited trust, accessibility challenges, weak communication, insufficient rightsholder participation, and fear of retaliation.



Source: Grievance Mechanism Toolkit (Reckitt/OBAS) adapted from ETI (2019).

### Connecting the Layers

A layered ecosystem works only when the mechanisms are intentionally connected, where each level plays a distinct but interdependent role:

- **Operational-level mechanisms:** Handle immediate local harms, and provide the closest, fastest option for resolving issues.
  - **Gaps:** Limited independence, low trust among vulnerable groups, retaliation risks, inability to address buyer-driven or system-wide harms.
- **Brand/Buyer-level mechanisms:** Address grievances arising from purchasing practices, common issues across suppliers and locations, supplier-level failures, and situations requiring leverage beyond the supplier.
  - **Gaps:** Variable awareness among intended users, inconsistent follow-up, dependence on supplier cooperation.
- **Multi-stakeholder mechanisms:** Address systemic and cross-border issues, provide neutral oversight, and use collective leverage to drive remedy and prevention across a sector.
  - **Gaps:** Variable investigative capacity, governance complexity, resourcing constraints.

Recognizing complementarities and strengthening connection among levels allow for a layered grievance ecosystem where:

- Rightsholders choose the safest and most appropriate pathway for raising concerns.
- Suppliers resolve issues early and prevent escalation.
- Buyers identify patterns and use leverage responsibly.
- Sectors collaborate to address systemic risks and prevent recurrence.

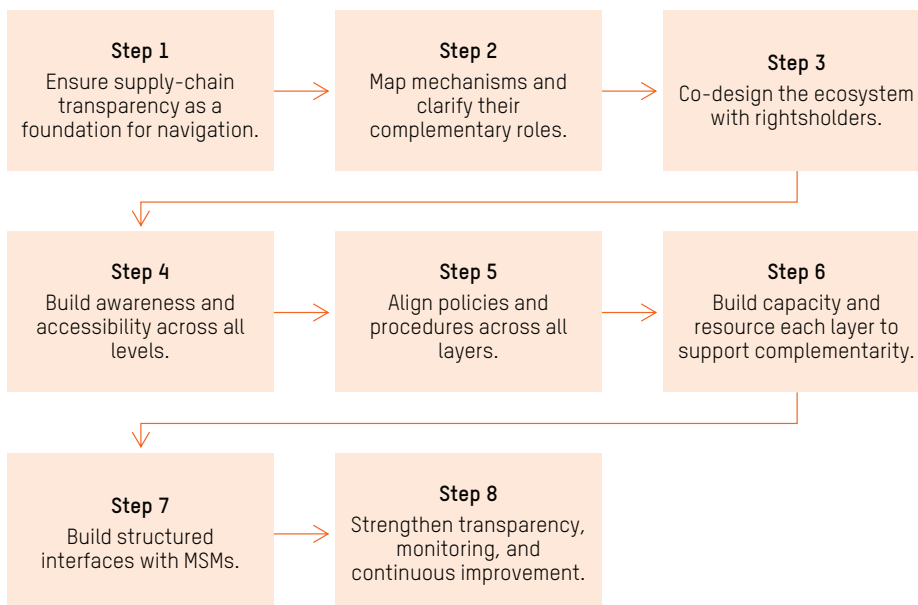
### 3. GRIEVANCE MECHANISMS ON FISHING VESSELS

The briefing provides a spotlight on access to remedy on fishing vessels where working conditions particularly on distant water fleets can be isolated, hazardous, and difficult to monitor, making grievance mechanisms a critical lifeline for workers. Yet, these mechanisms often fall short, as limited connectivity, power imbalances, and barriers to accessing support—make it difficult for workers to safely report abuses or seek remedy. While some promising practices are emerging, the sector still lacks people-centered and effectively coordinated systems capable of delivering timely remedy.

### 4. ROADMAP TOWARD A LAYERED ECOSYSTEM OF GRIEVANCE MECHANISMS:

Building on these findings, the briefing outlines practical steps for companies to design a layered grievance mechanism architecture across operational, brand, and multi stakeholder levels that reflects the lived realities of rightsholders and aligns with the UNGP effectiveness criteria—ensuring mechanisms are accessible, safe, transparent, and co designed with those most affected, with clear pathways for escalation, learning, and meaningful remedy.

To ensure that grievance mechanisms operate in complementarity and not as siloed or competing channels, each company needs actionable steps that weave together the roles and navigation strategies of rightsholders, suppliers, buyers, and MSIs. The following roadmap outlines a sequence of actions and responsibilities that a company sourcing in global supply chains should take to enable a coherent, layered grievance ecosystem.



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