

NAVIGATING GRIEVANCE MECHANISMS: A PATHWAY TO ROBUST ACCOUNTABILITY FOR RIGHTSHOLDERS

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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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This paper was written by Monica Romis with the support of Caroline Brodeur. Section 3 was authored by Ashley Aarons and Caroline Brodeur. Oxfam acknowledges the assistance of Ashley Aarons, Mira Alestig, Maria Atuesta, Anouk Franck, Susana Gauster, Juan Pablo Ozaeta Torres, Martis Palencia, Laura Raven, Helen Ripmeester, Romita Shah, Elizabeth Stevens, Irit Tamir, Valentin Vilanova in its production. It is part of a series of papers written to inform public debate on development and humanitarian policy issues.

For further information on the issues raised in this paper, please email advocacy@oxfaminternational.org.

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The information in this publication is correct at the time of going to press.
Published by Oxfam GB for Oxfam International under DOI: 10.21201/2026.000132

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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).

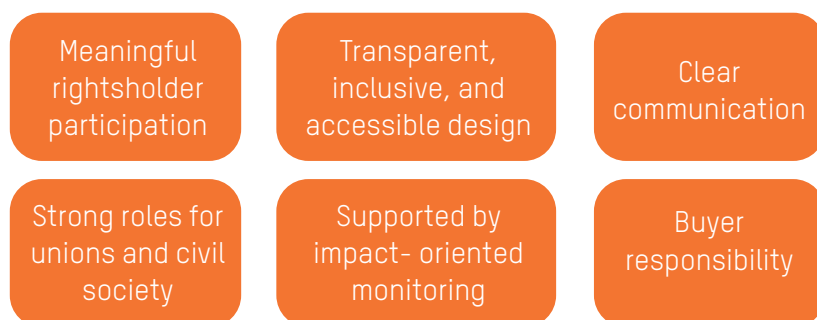
This paper argues that fulfilling companies' responsibility to provide access to remedy requires a shift toward **people-centered grievance systems** that are codesigned with those most affected, alongside a **layered grievance ecosystem** that connects operational, brand, and multistakeholder mechanisms. 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

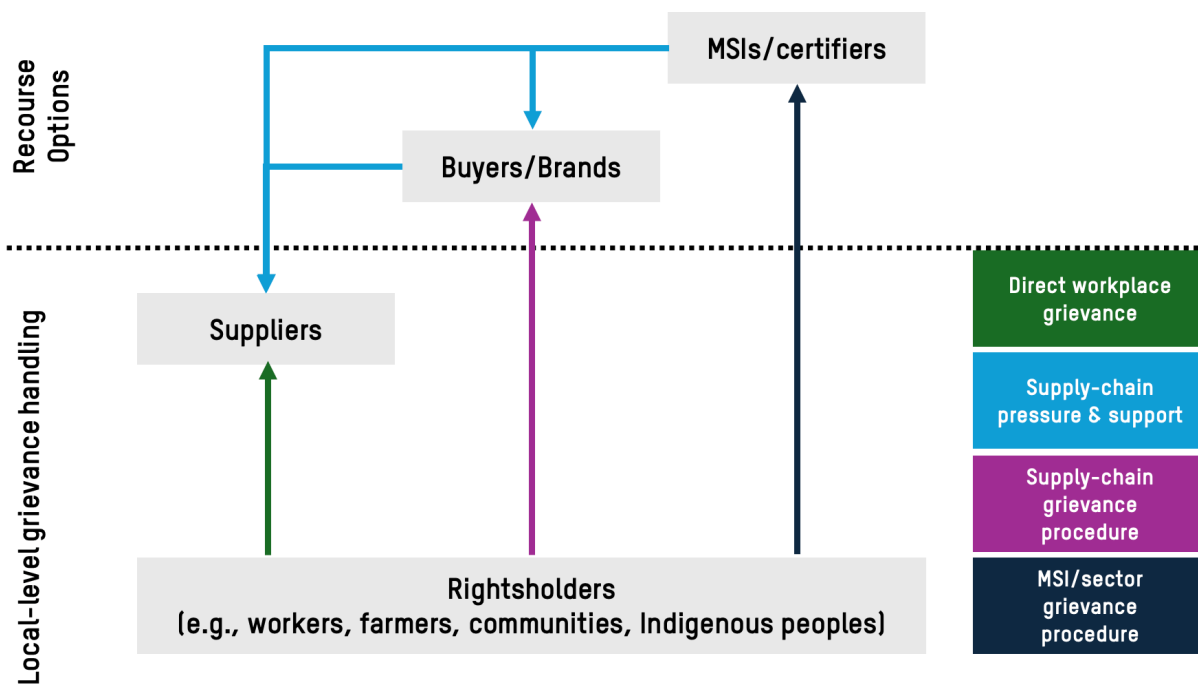
Grievance mechanisms often fall short because they are treated as compliance-driven tools rather than rights-based systems for remedy, and because rightsholders are not meaningfully involved in their design or operation. A narrow focus on metrics and case closure overlooks whether remedies are fair, 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.

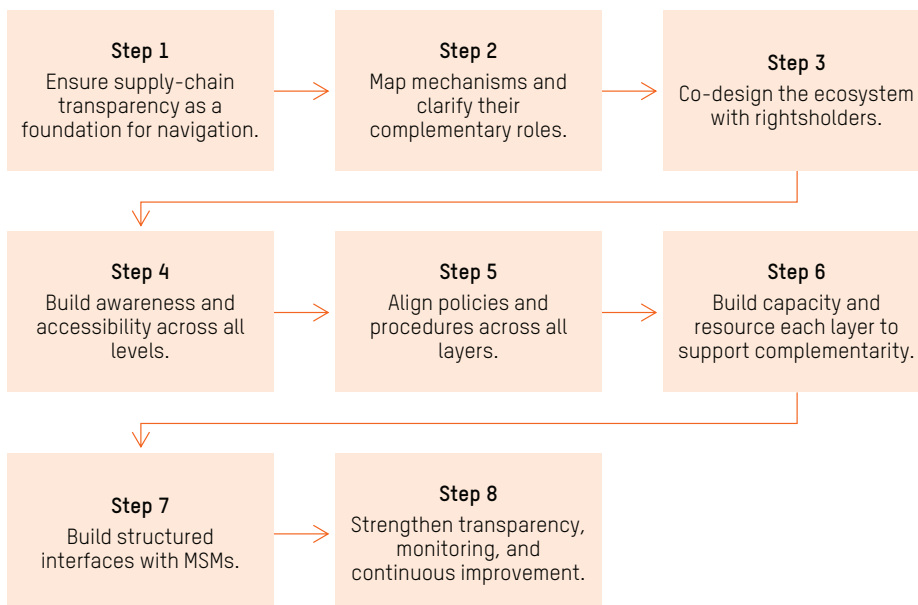
3. GRIEVANCE MECHANISMS ON FISHING VESSELS

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.



INTRODUCTION



The UN Guiding Principles on Business and Human Rights (UNGPs) establish a clear expectation that companies should respect human rights and have a responsibility to ensure access to remedy for people adversely affected by their activities. This responsibility is not theoretical—it is increasingly codified in national and regional regulations such as the EU Corporate Sustainability Due Diligence Directive (CSDDD), the German Supply Chain Act, and France’s Duty of Vigilance Law.

A key part of this responsibility involves establishing grievance mechanisms (GMs) that are accessible, credible, and rights-compatible. Grievance mechanisms are a core element of a company’s human rights and environmental due diligence (HREDD) system. They serve both preventive and corrective functions: surfacing risks before they escalate, enabling early resolution of harm, and demonstrating corporate accountability. A well-functioning grievance mechanism should offer rightsholders—particularly workers, communities, and marginalized groups—a safe way to raise concerns without fear of retaliation. Principle 31 of the UNGPs makes this explicit by laying out eight effectiveness criteria: companies are expected to create or participate in mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on dialogue, and a source of continuous learning. Most importantly, these mechanisms must be trusted by and accessible to the people whose rights are at risk.

Yet despite this clear guidance, many companies fall short in practice. Too often, grievance mechanisms are treated as compliance tools—designed and managed internally, with minimal engagement from rightsholders. As a result, such mechanisms, though they technically exist, may be functionally irrelevant: poorly communicated, inaccessible because of language barriers or cultural disconnects, and unable to inspire the safety and trust needed for people to raise concerns without fear. In addition, grievance mechanisms are rarely transparent; information about their operation or outcomes is rarely made public, limiting external scrutiny and accountability. Also, confidence in remedy is often low, given repeated experiences of no response or inadequate outcomes.

The consequences are not abstract. When people have no meaningful way to report abuses or seek redress, harms persist—with real impacts on lives, livelihoods, and communities. Companies, in turn, expose themselves to legal, financial, and operational risks.

The paper argues that effective grievance mechanisms must be **both people-centered and layered within a cohesive grievance ecosystem**. Achieving a people-centered approach means designing and operating mechanisms that are genuinely accessible, inclusive, and trusted by those most affected. This requires grounding the design in the lived experiences of rightsholders and prioritizing participation, accessibility, and accountability. Without this foundation of trust, even a well-structured system will likely be underutilized or dismissed as a token gesture. If a GM is not perceived as independent or safe for workers to use, concerns will never be raised and harms will remain unaddressed.

Creating truly effective access to remedy requires companies to move beyond fragmented, isolated mechanisms and build a layered “grievance ecosystem” where different levels work together. In complex value chains, such a system fosters shared responsibility and collaboration, encouraging accountability at every level:

- Operational-level mechanisms provide the most immediate and accessible avenue for workers and communities to raise concerns, offering on-the-ground recourse.
- Brand and buyer mechanisms provide cross-supply-chain oversight, leveraging a brand’s influence to drive accountability beyond individual supplier sites.
- Multi-stakeholder mechanisms (MSMs) tackle systemic, sector-wide issues that no single company can solve alone. When effectively linked with operational and brand-level systems, MSMs can address persistent or structural issues, offering independent spaces for dealing with collective grievances.



Farmworkers harvest wine and table grapes from a vineyard in Rawsonville (Roeswater Farm) in South Africa. Credit Alexa Sedgwick/Oxfam

Each layer of the ecosystem strengthens the others. Issues are addressed at the most appropriate scale, ensuring that site-level problems are handled quickly, cross-supplier concerns are overseen by brands, and structural issues are elevated for collective response. Together, they create a “ladder of remedy” where issues can surface early, escalate appropriately, and lead to both individual redress and structural improvements, ensuring that no grievance falls through the cracks.

These two goals are deeply interdependent. Without a people-centered foundation, even well-structured systems may be distrusted, unused, or ineffective. Without a layered system, rightsholders face fragmented channels, duplication, and confusion because there is no clear pathway to seek recourse when a mechanism is missing at one level.

METHODOLOGY AND OVERVIEW OF THE BRIEFING

Drawing on lessons from high-risk sectors like agriculture and apparel (where more examples of good practice exist), this briefing explores how companies can build grievance systems that reflect the UNGPs and function as a tool for those most at risk. The specific challenges faced on fishing vessels are closely examined to provide targeted guidance for this complex sector.

The methodology for this briefing involved several key components:

- **Desk research:** Existing knowledge was gathered through a comprehensive review of academic journals, industry reports, NGO publications, and other relevant literature pertaining to grievance mechanisms in high-risk sectors.
- **Document analysis:** Internal documents, case studies, and interview transcripts from previous related research were reviewed to extract relevant information on key themes, challenges, and best practices.
- **Structured interviews:** In-depth qualitative data were collected through interviews with representatives from approximately six selected grievance-mechanism initiatives. These initiatives were chosen for their practical experience in implementing GMs and for their potential to offer promising insights.
- **Analysis and findings:** Insights from the interviews and desktop research, combined with prior experience working with GMs, were analyzed to identify good practices and remaining gaps aligned with the UN Guiding Principles.

While no single initiative analyzed in this paper fully meets UNGPs-aligned expectations, each provides valuable lessons. This allows for combining insights to provide a complete picture of effective practices. The briefing acknowledges that the list of initiatives covered is not exhaustive, and other positive examples may exist beyond the scope of this paper.



Marcos and Ascensión are sugarcane producers in the Ecological and Solidarity Agricultural Cooperative of Piura (CAES Piura), in the mountainous region of Piura, Peru. Credit: Pablo Tosco / Oxfam Intermón

The briefing is organized in four main parts:

- 1. Reframing grievance mechanisms:** Why grievance mechanisms often fail, and how reframing them as rights-based systems for remedy can address persistent barriers such as lack of participation, fear of retaliation, and fragmentation.
- 2. Navigating the approach:** A practical analysis of three types of mechanisms—operational-level, buyer/brand-level, and multi-stakeholder—highlighting their strengths and limitations. Drawing on examples from high-risk sectors such as agriculture and apparel, this section focuses on positive practices to demonstrate what can be achieved in practice.
- 3. Grievance mechanisms on fishing vessels:** Grievance mechanisms in the fishing sector often fall short because the realities of work at sea—isolated conditions, 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 remains far from providing people centered, coordinated systems that are accessible, trusted, and capable of delivering timely and effective remedy.
- 4. Road map toward a layered ecosystem of grievance mechanisms:** This section outlines how companies can 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—while offering practical steps to ensure mechanisms are accessible, safe, transparent, and co designed with those most affected, with clear pathways for escalation, learning, and meaningful remedy.

1. REFRAMING GRIEVANCE MECHANISMS AS RIGHTS-BASED SYSTEMS FOR REMEDY



A grievance mechanism only works when people trust it, use it, and see meaningful outcomes. Yet, despite growing awareness among businesses, many rightsholders still cannot access remedies through these mechanisms. At the core of these shortcomings lie two key issues: a compliance-driven mindset and the lack of genuine rightsholder participation.

A Compliance-Driven Mindset

Many companies treat grievance mechanisms primarily as risk-management or -reporting tools, reducing them to quantitative indicators such as the number of grievances received or resolved. This approach often overlooks whether remedies are fair, meaningful, or timely, and leaves structural issues unaddressed. Data is rarely disaggregated by gender, contract type, or migrant status, which can hide patterns of exclusion. A compliance mindset limits grievance mechanisms to box-ticking and quantitative metrics, ignoring fairness and remedy outcomes, and contributes to:

- **Lack of learning and continuous improvement:** When mechanisms are compliance-focused, they are rarely set up to generate and act on lessons learned. Companies often lack formal processes for integrating grievance data into broader HREDD or risk-management systems. Grievance mechanisms become static tools rather than dynamic systems for early warning and organizational learning. Without learning, reflection, and change, companies miss opportunities to address root causes and prevent future harm.
- **Lack of remedy and follow-up:** A compliance lens prioritizes case closure over ensuring that remedies are meaningful and preventive. Even when grievances are filed, companies may struggle to provide timely, adequate, and culturally appropriate remedies. Furthermore, lack of transparency and insufficient feedback loops erode trust and reduce the ability of GMs to address the root causes of grievances so as to ensure that similar harms do not occur again.
- **Fragmentation and duplication:** Multiple actors may set up separate mechanisms solely to meet their own compliance requirements, without coordination or alignment, making systems harder to navigate for rightsholders. This leaves workers and communities across global supply chains facing an array

of overlapping, uncoordinated grievance systems—brand-led hotlines, certification bodies, industry initiatives, internal mechanisms—that remain confusing and still leave critical blind spots. Rightsholders may not know which mechanism is appropriate or may abandon complaints after a negative experience with one channel. The absence of clear referral pathways and coordination across mechanisms leads to underreporting and unresolved harms.

Lack of Rightsholder Participation

Grievance mechanisms are often designed without meaningful involvement from the people they are meant to serve. Without active engagement in design, implementation, and review, mechanisms typically fail to reflect the lived realities of workers, communities, and other rightsholders, undermining their legitimacy and use. Effective grievance mechanisms require more than internal company action; they rely on solid, trust-based relationships with external actors who provide representation, legitimacy, and local insight. Trade unions and civil-society organizations (CSOs) bring different yet complementary strengths, reflecting and supporting different groups of rightsholders affected by business operations. Rightsholders should be able to bring in unions or CSOs for support; without this option, they may feel powerless or isolated. Where companies establish grievance mechanisms that operate outside of, or are not meaningfully connected to, these existing representation and support structures, there is a risk of bypassing and weakening them. Instead, grievance mechanisms should be embedded within and aligned with these ecosystems—complementing and reinforcing their roles rather than undermining them. Involving these stakeholders strengthens the credibility, accessibility, and uptake of grievance mechanisms—especially in contexts where rightsholders may lack the power, voice, or confidence to raise concerns directly.

This lack of rightsholder participation contributes to:

- **Limited scope and visibility:** Mechanisms designed without rightsholder input are less likely to account for the needs of informal workers, migrants, women, and remote communities. Many grievance mechanisms are restricted to direct employees or formal channels. Informal workers, subcontracted labor, women, migrant workers, and communities—who are often at greatest risk—may not even be aware that a grievance system exists. Language barriers, digital exclusion, lack of guidance on how to use the mechanism, and physical distance from access points compound the problem.
- **Fear of retaliation and lack of trust:** Without rightsholder involvement in defining safety measures and independence, mechanisms may fail to build credibility and inspire confidence. In many contexts, raising grievances can carry serious risks. Workers fear losing their jobs, being blacklisted, or facing other forms of retaliation. While companies may outline non-retaliation policies on paper, these are often not backed by clear and credible safeguards for safety and anonymity, and many rightsholders will therefore remain silent. In some contexts, grievance handlers

may be aligned with management or lack neutrality, further undermining trust in the system. Without robust protections, anonymity, and independence, mechanisms will not be used by vulnerable employees—and risks will remain hidden.

- **Lack of remedy and follow-up:** Remedies may not be culturally appropriate or responsive to rightsholder needs if those needs were never integrated into the system design.

To meet the expectations of the UNGPs and evolving due diligence requirements, companies need to move beyond treating grievance mechanisms as internal, “check-the-box” risk-management tools. Instead, they should be reframed as rights-based systems for remedy, dialogue, and accountability, shifting away from a compliance-driven mindset. This shift starts with centering the voices and priorities of rightsholders, particularly those most at risk. Rightsholders should not be seen as passive recipients of remedy, but rather as co-designers and co-owners of the mechanisms. Their active participation in the design, validation, monitoring, and adaptation of grievance processes is essential to ensuring that systems reflect their lived realities and deliver meaningful outcomes. Achieving this requires sustained, inclusive engagement—with particular attention to women, migrants, informal workers, and Indigenous communities—to ensure that mechanisms are accessible, trusted, and effective for all.

Similarly, a focus on remedy requires recognizing that no single grievance mechanism can address the full spectrum of human-rights risks and rightsholder concerns, particularly in complex global supply chains. Rightsholders need access to a variety of mechanisms that are responsive to their needs. Operational-level, brand- or buyer-level, and multistakeholder or external mechanisms all have a role to play within a broader ecosystem, collectively enabling more effective remediation for rightsholders. The next section explores how these different approaches are being put into practice, highlighting emerging good practices and lessons that can inform more people-centered grievance systems.



Niladri Saha, Quality Control team lead at Rajlakshmilakshmi, on the outskirts of Kolkata, India, where he has worked for over 13 years. Credit: Júlia Girós / Oxfam Intermón

1.1 EMBEDDING PEOPLE-CENTERED PRACTICES ACROSS ALL GM LEVELS

A people-centered approach to grievance mechanisms requires alignment among all actors—workers, communities, suppliers, buyers, unions, CSOs, and public institutions—to create multiple, safe, and trusted pathways for raising concerns and securing remedy. These good practices apply across all levels of GMs—operational, brand, multi-stakeholder initiatives (MSI) /sector-wide—and together help ensure that every part of the ecosystem remains grounded in the needs, realities, and rights of those most affected. Regardless of where a mechanism operates within the broader system, a people-centered GM ecosystem is characterized by:

Meaningful Rightsholder Participation

Effective mechanisms are grounded in the insights and lived experiences of rightsholders themselves. This means involving workers, unions, CSOs, and affected communities in the design, testing, and ongoing review of GMs so that they reflect real risks, local norms, and practical barriers. Continuous engagement—rather than one-off consultations—helps maintain trust, ensures that mechanisms evolve with changing conditions, and signals to rightsholders that their voices influence decisions.

Worker Representation Through Trade Unions

Trade unions provide the most legitimate structure for democratic worker voice. Their involvement ensures that concerns are raised and addressed through organized and empowered channels, not individual risk-taking. Unions strengthen investigations, negotiate lasting solutions, and help embed GMs within broader systems of collective bargaining and social dialogue. Where unions are restricted, alternative worker bodies can complement—but not replace—their critical role.

Civil-Society Engagement

CSOs bring independence, contextual understanding, language skills, and credibility that company-led approaches often lack. Their involvement helps uncover hidden risks, reach marginalized groups, and support culturally responsive and gender-responsive grievance handling. When CSO-led channels already exist, companies should reinforce rather than replace them, ensuring multiple trusted entry points into a broader grievance ecosystem.

Transparent Supply-Chain Information

Rightsholders cannot use grievance systems if they do not know who is responsible or which channels apply. Public supplier lists, sourcing disclosures, and clear communication of roles make grievance pathways navigable and help workers and communities identify appropriate routes

for raising concerns. Transparency also strengthens accountability by revealing systemic risks and enabling external scrutiny.

Accessible, Safe, and Culturally Relevant Mechanisms

Accessibility requires removing linguistic, cultural, technological, and psychological barriers so that all rightsholders can safely raise concerns. This includes providing channels in local languages, accommodating literacy differences, offering anonymous options, and tailoring approaches to local gender norms and social dynamics. Culturally grounded design—supported by unions, CSOs, women’s groups, and community leaders—ensures that mechanisms align with trusted ways of communicating and do not unintentionally exclude vulnerable groups.

Inclusive Design for Marginalized Groups

A people-centered approach recognizes that many at-risk rightsholders—informal workers, subcontracted workers, migrants, home-based workers, and community members—fall outside traditional workplace structures. GMs must therefore intentionally expand eligibility, adapt outreach methods, and partner with organizations that can reach these groups. Inclusion ensures that the people most affected by harm have meaningful access to remedy.

Impact-Oriented Monitoring

Monitoring goes beyond counting cases to assessing fairness, timeliness, remedy quality, recurrence, and whether underlying causes are addressed. This approach identifies systemic risks, strengthens prevention, and ensures that grievances lead to improvements in working conditions, policies, and practices. Rightsholder satisfaction and participation are core indicators of success.

Data Transparency and Communication

Sharing aggregated information about grievance volumes, categories, timelines, outcomes, and systemic improvements builds confidence in the mechanism. Because company-led reporting has limits, transparency should be complemented by independent oversight, worker feedback, and input from unions and CSOs. Clear communication shows rightsholders that raising concerns results in action.

Buyer Responsibility

Buyers shape the enabling environment for grievance mechanisms across supply chains and within MSIs. Their support to operational-level GMs and active participation in investigations, contributions to remediation, alignment of purchasing practices with responsible sourcing, and transparent engagement reinforce accountability. When buyers use their leverage collectively, they strengthen both supplier-level GMs and sector-wide grievance systems, making remedy more predictable and accessible.

2. NAVIGATING THE APPROACHES: DIFFERENT MECHANISMS, SHARED PURPOSE



Grievance mechanisms exist across multiple levels within and beyond a company's operations. These can be broadly categorized into three interconnected tiers:

1. Operational-Level Mechanisms

These are grievance channels embedded within a company's direct operations. They primarily address issues experienced by workers, local communities, and other directly affected rightsholders as a result of the company's own operations.

2. Brand/Buyer-Level Mechanisms

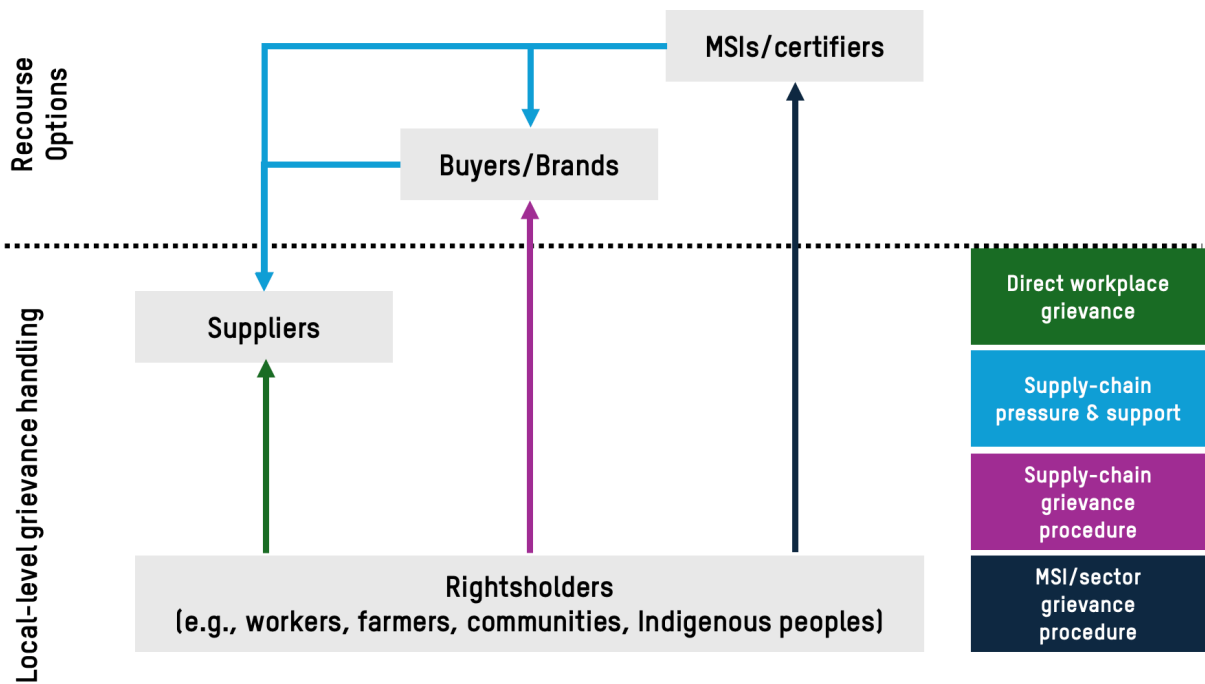
These are systems established by global brands and purchasing companies (buyers) to identify, address, and resolve human rights and labor issues in their supply chains. They enable affected individuals or groups, such as factory workers, farmers, and community members, to raise concerns about a brand's supply-chain practices directly to the company. These mechanisms help companies meet their responsibility to respect human rights beyond their direct operations, and complement—but do not replace—local and supplier-level systems.

3. Multi-Stakeholder and External Mechanisms

These sector-wide or cross-sectoral platforms provide grievance channels beyond the control of any single company. They are typically jointly governed by businesses (including industry associations), civil society, unions, and occasionally governments, while technical operations and administration may be carried out by a third-party provider. By combining multi-stakeholder governance with professional management, these mechanisms have the potential to offer an additional layer of impartiality, systemic insight, and capacity for collective action.

Figure 1 illustrates how these three levels coexist in a supply-chain setting.

Figure 1. Levels of Grievance Mechanisms



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

These mechanisms are not mutually exclusive; taken together, they can offer complementary strengths and broader access to remedy. In principle, an operational-level grievance may be escalated to a brand-level or multi-stakeholder mechanism when issues remain unresolved or reveal systemic problems. Similarly, grievances raised through brand-level mechanisms can be referred to a multi-stakeholder forum, where investigations involving NGOs or unions provide independent oversight and collective action. Table 1 outlines the strengths and limitations of each level of grievance mechanism and identifies the types of issues for which they are best suited. It provides a snapshot of how the three levels can complement one another, rather than duplicate or replace each other.

Table 1. Strengths, Limitations, and Complementary Roles of Grievance Mechanism Levels

Level	Primary Function	Scope of Issues	Potential Strengths	Common Limitations	Best Used For
Operational <i>Example:</i> <i>“Speak Up” mechanism in factories; farm-level grievance desk.</i>	First line of response—immediate, site-level resolution.	Individual or workplace-specific issues (e.g., pay disputes, harassment, safety).	<ul style="list-style-type: none"> Proximity to rightsholders: quick, practical response. Builds local trust when co-designed. Supports early issue identification and prevention. Can feed into broader risk management. 	<ul style="list-style-type: none"> Often lack independence. May not protect against retaliation. Limited to direct workforce. Low trust if managed solely by employers. 	<ul style="list-style-type: none"> Individual grievances. Everyday workplace issues. Early conflict resolution.
Brand/Buyer <i>Example:</i> <i>Brand hotline or web-based complaint system.</i>	Oversight, leverage, and escalation beyond site level.	Similar issues occurring across multiple suppliers, purchasing practices, or unresolved local grievances.	<ul style="list-style-type: none"> Expands coverage beyond operational level to encompass supply chains. Provides recourse when local systems fail. Can link grievances to purchasing practices. Builds consistency across suppliers. 	<ul style="list-style-type: none"> May feel distant or inaccessible to workers. Often underused without local outreach. Risk of bias if operated internally by brands. 	<ul style="list-style-type: none"> Multi-supplier or systemic issues. Complaints tied to brand decisions (e.g., deadlines, pricing). Unresolved operational grievances.
Multi-Stakeholder/Sector	Collective platform/agreement to provide access to remedy for workers in covered factories.	Cross-company, sectoral, thematic (e.g. occupational safety and health), or transnational grievances (e.g., forced labor, recruitment fees, unsafe conditions).	<ul style="list-style-type: none"> Brings independence and shared accountability. Addresses root causes and systemic issues. Can be impactful if compliance is linked to purchasing practices. Encourages collaboration and transparency. Strengthens worker voice at scale. Can enhance data reliability and validity when rightsholders trust the mechanism and have access to independent reporting channels 	<ul style="list-style-type: none"> Complex, multi-stakeholder governance structures can slow decision-making and delay timely access to remedy for rightsholders. Risk of weak enforcement if voluntary. Limited scope or geographic reach. Limited group of users/workers Dependent on sustained funding. 	<ul style="list-style-type: none"> Structural risks across supply chains. Cross-border or sector-wide harms (e.g., forced labor, unsafe conditions).



Men recruited by the Ogbonge women to harvest the Tilapia fish in Lagos (Nigeria). Credit: Maxwell Osarenkhoe / Oxfam

In theory, this layering helps ensure that grievances are addressed at the most appropriate level while drawing on the strengths of each mechanism. In practice, however, coordination and clear escalation pathways across these levels are often missing, leading to confusion about responsibilities and leaving rightsholders without a clear route to remedy.

Building on the idea of a layered grievance architecture, this section looks more closely at each type of grievance mechanism and how it can better serve rightsholders in practice. It highlights their respective strengths and limitations to illustrate:

- How each mechanism can empower—or fail—rightsholders in seeking remedy.
- Which design features support a more people-centered approach.
- How each mechanism ensures accessibility, trust, and safety.

2.1 OPERATIONAL-LEVEL GRIEVANCE MECHANISMS: FROM COMPLIANCE TO EMPOWERMENT

What Operational Grievance Mechanisms Often Are—and Why They Fall Short

Operational-level grievance mechanisms are company-level systems designed to enable workers, communities, and other rightsholders to raise concerns directly linked to business operations. They are meant to function close to where impacts occur—such as in factories, farms, or supply-chain worksites—and provide an early, accessible pathway to remedy. See examples in Table 2.

Table 2. Examples of Operational-Level Grievance Mechanisms

Type	Description	Hypothetical Example
Open Door Policy (Informal Process)	Permits workers to directly approach their supervisor or manager to raise a concern without needing to file a formal complaint.	A worker notices unsafe stacking of materials and speaks directly to the floor supervisor, who takes immediate action to reorganize storage.
Suggestion Boxes (Company Complaint Box)	Anonymous, written submissions allowing workers to share concerns, ideas, or complaints at any time.	A suggestion box placed in the changing room is used by a worker to highlight insufficient ventilation on the production floor, prompting management to install ceiling fans.
Workers' App (Technology-Based App)	A mobile application whereby workers can submit grievances, track their status, and receive updates in real time.	A garment factory's app allows workers to report excessive overtime anonymously. Management responds through the app, explaining corrective steps and expected timelines.
Dedicated Mobile Number/Email (Company Complaint Hotline)	A direct line of communication for grievances, typically monitored by HR or a grievance officer.	Workers' email concerns about faulty air conditioning in the workshop are sent to a dedicated address. Repairs are made, and the workers receive confirmation of the fix.
Worker Committee (Joint Committee)	A group composed of worker representatives and management that meets regularly to discuss and resolve grievances.	In a monthly committee meeting, women in a processing facility express that they are uncomfortable wearing the required uniform because they are very short and see-through and often lead to harassment. The complaint is addressed through the procurement of new uniforms and provision of trainings on preventing sexual harassment.
Trade Union	Workers' concerns raised through their union representatives, who negotiate directly with management.	The union collects complaints about unpaid overtime and engages in discussions with management, resulting in back pay and a revised overtime policy.
Third-Party Hotline	Grievances received and managed by an independent body, which often provides translation and confidentiality protections.	Workers in an electronics assembly plant use a third-party hotline to report that they had to pay recruitment fees to be hired for the job. The service investigates and coordinates with management to pay back fees, without revealing the complainants' identities.

When operational grievance mechanisms are well designed, they can be active, preventive tools for early identification and resolution of human rights risks—not merely administrative complaint channels. Unlike most internal procedures—which tend to be passive, waiting for problems to arise and then responding—effective GMs proactively facilitate the identification of issues and address them as early as possible. They do so by being known, trusted, and accessible to the rightsholders they are intended to serve, allowing companies to detect patterns, emerging risks, and systemic issues before they escalate into harm.

Box 1. How operational grievance mechanisms meet rightsholders' needs:

- They provide direct access for workers and communities close to the site of harm.
- They employ familiar formats (e.g., in-person, verbal complaints), reducing fear and barriers, especially for low-literacy or migrant workers.
- If co-designed with rightsholders, they can reflect local cultural and gender norms, making them safer and more trusted.

In practice, our direct engagement with companies shows that site-level mechanisms often receive very few complaints, which can create the impression that issues are minimal, and the mechanism is working effectively. However, a low volume of grievances does not necessarily indicate a healthy workplace, but may instead reveal distrust, fear of retaliation, or lack of confidence in the system.

In various company sites that Oxfam engaged with, consultations revealed that workers feared reprisals and lacked trust in management-led processes. In these cases, most preexisting grievance mechanisms were designed without involving workers in the process, which directly led to this lack of trust in the system and contributed to the low usage and engagement. Through surveys, focus groups, and direct interviews, several barriers to the effective use of grievance mechanisms quickly became evident:

- **Language barriers:** Indigenous Peoples and migrant workers in particular faced challenges understanding the language used in grievance mechanisms, making them less likely to engage.
- **Cultural and social norms:** In some environments, cultural or social norms discouraged workers from raising complaints, particularly in hierarchical settings.
- **Lack of appropriate channels:** Many workers were uncomfortable raising concerns with direct managers, lacked literacy to communicate in writing, or had no access to necessary tools such as smartphones or apps. The location of suggestion/complaint boxes can inhibit usage; for example, when placed in visible public areas like HR offices, entry gates, or food canteens or near surveillance cameras, employees felt that using them was too visible to management and therefore refrained from using them.
- **Fear of retaliation:** Workers feared retribution for speaking out, undermining the effectiveness of grievance channels. In some cases, the absence of anonymous complaint options further increased fear and decreased engagement.
- **Low awareness and trust:** A significant portion of workers did not understand their rights or how the grievance mechanism functioned, limiting their ability to recognize issues or seek support. Insufficient communication and training on workers' rights left many unaware of when and how to use the system.

- **Low trust:** The centralized and often opaque nature of grievance systems eroded worker confidence. Without clarity on how cases are handled in practice—including the number and types of cases received, how cases are assessed and resolved, timelines for each stage of the process, and whether outcomes deliver remedy for rightsholders—many workers doubted that raising concerns would lead to fair outcomes (or any outcome at all).
- **Lack of management follow-up:** When workers did use the available mechanisms, they often reported that factory management was dismissive of their grievances and did not respond in a timely manner or at all. The lack of timely and constructive responses from management to workers' grievances, even minor ones, leads to a loss of trust in the grievance mechanisms. Workers often use minor complaints to test the system's effectiveness; when management fails to respond, workers conclude that the system is ineffective, making them less likely to use it for serious issues.

As a result, many company mechanisms remain formalistic, underused, and distrusted. Too often, they have been:

- Company-driven rather than people-centered, designed without the participation of those they are meant to serve.
- Narrow in scope, focusing only on compliance or individual grievances rather than addressing systemic issues.
- Opaque or inaccessible, with unclear procedures, limited communication, and channels that exclude some vulnerable groups, such as migrant, informal, or low-literacy workers.
- Perceived as biased or unsafe, especially when managed solely by employers without independent oversight or protection against retaliation.

What Good Looks Like

How have companies addressed these limitations while still capturing the intended benefits of operational GMs? Experience from implementing the OBAS/Reckitt toolkit (see box below) brings practical insights for companies operating in global supply chains, including both buyers and suppliers. This section is supplemented by an additional good-practice example from a supplier company in Guatemala that did not use the toolkit.¹

¹ Company examples in this section have been anonymized in order to ensure workers were not put at risk and because each example is drawn from a moment in time and Oxfam was unable to continually follow up to ensure the situation on the ground had not changed. Oxfam is using the examples in an effort to show companies what is possible, not necessarily to endorse any particular situation or company.

The Grievance Mechanism Toolkit

The Grievance Mechanism Toolkit, originally developed by Oxfam Business Advisory Service for Reckitt and made public by them, provides a structured pathway for companies to embed good practices in line with the UNGPs. It enables companies to design, implement, and continuously improve grievance mechanisms that are inclusive, safe, and rights-compatible, with step-by-step guidance for each maturity level:

- **Before implementation:** The toolkit helps diagnose barriers—language, culture, lack of trust—through worker engagement, as seen in both pilots.
- **During implementation:** It supports participatory design processes, gender-responsive adaptations, and creation of multichannel systems.
- **After implementation:** It guides monitoring, transparency, and continuous learning through data sharing and regular feedback cycles.

The Toolkit can be used by companies at any stage of developing or strengthening their grievance mechanisms. It is not a tool or mechanism in itself, nor does it prescribe a single model. Instead, it outlines a process to help companies design, review, and implement site-level mechanisms that fit their specific context.

This paper draws on lessons from direct engagement with nearly 30 Tier-1² supplier companies across 20 countries through the implementation of the GM toolkit since its publication in 2021.

Operational-Level Grievance Mechanism in Guatemala

A large agribusiness group operating in Guatemala operates a formal, company-wide Grievance and Consultation Mechanism across its agribusiness operations, which include large-scale palm-oil, banana, plantain, avocado, and other agricultural production sites.

- The mechanism is free, confidential, and open to workers, community members, suppliers, and other stakeholders.
- Complaints are logged and managed through a centralized process that guarantees confidentiality and allows for traceability of each case across all operational zones.
- The system is designed to support both workplace and community-level issues.

Designed with Workers, Not for Them

In order to ensure that the mechanism reflects real needs and experiences, some companies have established worker-management task forces and co-designed the mechanisms—ensuring inclusion of women, migrant, agency-hired, and seasonal workers. The discussions that resulted were eye-opening and surfaced cultural and linguistic barriers. Through the taskforces, companies reshaped communication strategies and reframed the mechanisms in more approachable ways. For instance, they:

² Tier one are suppliers that have a direct relationship with the buyer/brand.

- Expanded the available channels for communication.
 - Introduced anonymous reporting channels.
 - Scheduled regular training sessions to enhance workers' knowledge and understanding of how to use the grievance mechanisms.
 - Used daily shop-floor meetings to raise awareness about the grievance procedures.
 - Widely communicated the grievance mechanisms through leaflets, posters placed across the shop floor, workers' newsletters, and online portals.
- **At one site in the UK**, a workshop exercise placed different types of workplace and personal issues on tables for discussion. Workers debated how they would raise these issues and what outcomes they would expect. This helped the taskforce see the range of options available and their benefits. Supervisors initially resisted, preferring that workers report directly to them. However, the exercise demonstrated the value of multiple options, reinforcing that workers should decide which channel suited them best. In the end, this activity revealed that workers wanted agency and choice in how to raise issues, and that not all concerns should follow the same pathway.
 - **The agribusiness operating in Guatemala** carried out perception studies among potential users to understand how workers viewed the grievance mechanism, identify barriers to use, and gather insights to improve design and communication—ensuring that the mechanism reflected real needs and user experience.

Words Matter

The word “grievance” was often found excessively negative and was intimidating to workers. Some companies decided to move away from the term and reframed complaints to include any workplace concerns, not just serious issues. Using milder terms encouraged workers to express themselves on matters of all kinds.

- One of the early outcomes of the worker/management taskforce leading implementation of the GM toolkit **at a UK site** was agreeing on a term or phrase that retained the seriousness of “grievance” while encouraging positive suggestions and innovations. Simply shifting from “grievance” to “Speak Up,” signaling that raising issues was a constructive process, helped create a more positive, open culture.

Multiple Reporting Pathways

Proximity to impacted people allows operational mechanisms to be responsive and context-sensitive. In several cases, multiple, locally relevant reporting channels—including suggestion boxes, anonymous

hotlines, in-person discussions, and digital tools—were introduced, enabling workers in these contexts to choose how they raise issues, thereby increasing accessibility and confidence. Clear communication about each option’s purpose and limitations is essential to ensure informed choice and ownership.

- **At the agribusiness operating in Guatemala**, the mechanism provides multiple entry channels, including a web-based system, email, toll-free phone lines, and in-person options, all monitored to ensure timely response.
- **At the UK site**, “Speak Up” was designed as a multi-channel system, and clear signage around the site explaining the strengths and limitations of each channel empowered workers to choose the route that worked best for them:
 - A whistleblowing line for anonymous reporting.
 - Suggestion boxes for anonymous written feedback (with a slower response rate).
 - Line managers for immediate resolution of operational issues.
 - A People and Culture department and a mobile app that enabled workers to submit cases through a guided, structured form.
- **At a supplier company in Egypt**, several new channels were introduced as a consequence of direct suggestions from workers. These included anonymous suggestion boxes, an open-door policy with HR, and the appointment of a dedicated grievance officer. Although such channels can face significant barriers to access or effectiveness in many contexts, in this particular case they proved to be welcome innovations because they reflected workers’ own priorities and were perceived as meaningful alternatives.

Broad Scope and Coverage

To be effective, operational-level GMs should not be narrowly confined to specific issues or categories of harm. They need to cover a broad range of concerns—spanning labor conditions, gender-based violence, environmental impacts, and community relations—so that all rightsholders can report issues affecting their rights or well-being. This broad scope aims to ensure that no grievance falls through the cracks, and to help companies identify emerging risks across their operations and value chains.

Similarly, these GMs should be accessible to all individuals and groups potentially affected by a company’s activities. Coverage must extend to diverse worker groups, such as seasonal, temporary, agency-hired, and migrant workers, as well as to other rightsholders and their representatives, including local communities and Indigenous peoples.

- For example, some task forces, in order to address ambiguity, have explicitly clarified the categories of issues covered by a

mechanism—for example, gender-based issues. At one site where the grievance policy initially omitted any explicit mention of gender, this category of issues was added, and specific training and awareness sessions were implemented to encourage women to report any concerns they might have.

- To better reach marginalized groups, some suppliers have appointed female representatives to create a safe space for women to share concerns, while others have designated representatives specifically for contracted workers in order to promote inclusivity and reduce fear of speaking up.

Allow Anonymous Grievances

Companies are often reluctant to allow anonymous grievance reporting, fearing that anonymity will make it impossible to obtain the information or clarification needed to properly investigate and resolve issues. However, management must recognize the importance of offering anonymous options, since such mechanisms can encourage rightsholders to raise sensitive concerns—such as harassment or gender-based issues—that they might otherwise be afraid to report.

When companies introduce anonymous reporting, they often see an increase in such cases, reflecting growing trust in the system. It is therefore essential that all anonymous grievances be investigated and properly followed up. Ignoring or failing to respond to these reports can reinforce workers' perceptions that the system is ineffective or even unsafe to use.

- **A company in India** faced the challenge of maintaining communication and transparency while handling anonymous grievances. To address this, it developed a public dashboard showing aggregated information on the status of all grievances (e.g., *received, under investigation, resolved*). This dashboard was displayed on noticeboards throughout the site and updated weekly, allowing all workers to track any progress on their issues and increasing their confidence in the process.

Ensure Gender-Responsive Grievance Handling

Embedding gender considerations into grievance processes helps ensure that complaints—especially those involving harassment or gender-based violence—are handled safely, confidentially, and in ways that protect survivors. Good practice includes creating dedicated procedures, ensuring women's participation in investigations, and providing appropriate support services.

- **At the agribusiness in Guatemala**, a specific protocol was implemented for handling gender-based violence (GBV) complaints, including participation of women in investigations, guidance on next steps (including formal complaints), and referral to specialized service networks.

Integrate with Company Procedures for Sustainability and Monitoring

By integrating operational-level grievance mechanisms with existing company processes—such as HR, health and safety, compliance, and community-engagement systems—the mechanisms become easier to implement, scale, and sustain over time. This approach creates long-lasting impact by embedding GMs into daily operations and drives action by consistently tracking issues and turning feedback into policy changes. In particular, it:

- 1. Ensures sustainability and long-term impact:** Weaving grievance processes into core company functions embeds them into standard business practice, ensuring that they last beyond specific projects or personnel. Integration helps standardize the process for addressing concerns, ensuring that grievances are handled consistently across the company. By tracking and monitoring grievance data, companies can identify systemic issues and drive proactive policy improvements.
- 2. Drives accountability and action:** Integrating GMs into formal procedures establishes clear ownership and oversight, ensuring that grievances are properly addressed and followed up on. Analyzing grievances provides valuable insights that can be used to inform broader operational improvements, turning feedback into meaningful action.
 - **At the UK site**, the “Speak Up” system used a Plan–Do–Check cycle to review grievance data with management and worker representatives, turning feedback into policy improvements.
 - **At the Italian site**, a grievance-tracking tool was created to improve internal records and handling, and a grievance committee made up of management and workers was established to provide oversight on how grievances were handled, ensuring consistent follow-up and accountability.
 - **At the agribusiness operating in Guatemala**, a high-level corporate committee regularly analyzes grievance cases to identify trends and root causes, enabling the company to implement long-term corrective actions, such as addressing workplace mistreatment at its source.

Embed Grievance Mechanisms in Workplace Social Dialogue

An effective grievance mechanism is built on a strong foundation of collective bargaining, which gives employees an active voice in the workplace. This fosters mutual dialogue and respect, allowing problems to be resolved before they escalate.

Integrating operational grievance mechanisms with established workplace social-dialogue platforms—such as trade unions, joint committees, or regular meetings—is a key element of a mature system of industrial relations. Such an approach strengthens trust and ensures

that employee concerns are addressed through continuous engagement rather than as a separate, reactive exercise. This requires embedding grievance handling into a company's culture that values feedback from workers and communities and sees feedback as an opportunity to learn, address systemic issues, and strengthen relationships rather than as a threat or liability. When these systems are part of established platforms, workers and their representatives can play an active role in shaping and improving the mechanisms, moving a company toward proactive collaboration and a culture of continuous improvement.

- **In a company in Pakistan** with a labor union on site, the worker-management task force leading the implementation of the GM toolkit decided that the president of the union would serve as the grievance officer, with the secretary as the alternate. The human-resources (HR) manager retained overall supervision of the mechanism to ensure its smooth functioning and to provide support to the union's officers, particularly during the early stages as their capacity was being strengthened. This formal integration of the union into the grievance process was a significant change for the company, as the union's role in grievance procedures had previously been unclear.
- **At an agricultural site in Spain**, representatives from the site's trade union were part of a task force that led the review of the existing grievance mechanism. This ensured that the resulting changes complemented and strengthened the union's role.

Support and Commitment from Buying Companies

Local suppliers often lack the resources to establish and maintain effective grievance mechanisms. Buying companies can play a critical role by setting expectations, providing technical and financial support, and reinforcing the importance of credible grievance systems as part of responsible sourcing. When buyers align incentives—for example, through key performance indicators (KPIs) or recognition of good practices—and emphasize that grievance processes are meant to improve practices rather than penalize suppliers, they create an environment where mechanisms can function effectively.

Buyers can further strengthen supplier relationships through direct support and capacity building, helping suppliers develop robust grievance systems while fostering trust and collaboration. Good practice also requires buyers to acknowledge that human rights issues may occur within their supply chains and to commit—explicitly in contracts—to supporting suppliers in addressing and remedying them. Visible backing from senior leadership further reinforces the importance of these mechanisms and signals to factory management that they are a priority. Finally, the brand's local employees (staff from a buying company who are based in the same country or region as the supplier) bring essential knowledge of local law, culture, and operating context. Their proximity enables them to monitor grievances, track outcomes, conduct investigations, and report to headquarters. External local consultants could also be hired to provide these functions, ensuring consistent oversight and support.

Potential Impact When Done Right

When operational grievance mechanisms are designed and implemented in this people-centered, UNGP-aligned way, they can deliver tangible, measurable benefits—for both rightsholders and businesses.

Findings from supplier sites where Oxfam has engaged show that the people-centered approach is contributing to improved workplace conditions and strengthening trust-based relationships between workers and management. This section highlights the benefits achieved in contexts where workers were the rightsholders primarily impacted. However, operational grievance mechanisms can also deliver significant advantages for other rightsholder groups, including communities and Indigenous peoples (Box 2).

Increased Worker Engagement

Interviews suggested that a people-centered approach increased worker engagement in the grievance mechanism across several supplier sites. Workers became actively involved in implementation, taking on roles such as that of grievance officer, participating in grievance committees, and offering regular feedback that created a closed-loop process for continuous improvement. Their confidence grew as well, reflected in a higher volume of grievances, ideas, and concerns shared with employers. Participation also expanded beyond workplace matters, with workers contributing suggestions related to broader business performance, including production.

- **At the agribusiness operating in Guatemala**, increases in the number of complaints were treated as a positive indicator of trust in the mechanism, signaling that workers and community members felt safer raising concerns and that the company was committed to meaningful issue resolution rather than mere compliance.

This progress was supported by improved access through the introduction of multiple grievance channels and by efforts to raise awareness of available options, clarify how the mechanisms function, strengthen protections against retaliation, and remove barriers that had previously limited workers' ability to engage.

“People were afraid to use the suggestion boxes, but now that they know how to use them and see that actions are taken when they raise concerns, they feel encouraged.”

Company in South Africa

Box 2. Benefits of Operational Grievance Mechanisms for Communities and Indigenous Peoples

- **Improved communication and transparency:** Regular dialogue through the mechanism can reduce misinformation, build shared understanding, and support ongoing relationships between companies, farming communities, and Indigenous peoples, especially where business activities affect land use, water access, or livelihoods.
- **Greater influence over company decisions:** Communities gain a predictable channel to raise concerns and influence operational decisions that may impact their rights, livelihoods, and cultural heritage.
- **Locally relevant solutions:** Remedies can be co-designed with communities and Indigenous peoples to reflect cultural norms, local agricultural practices, and collective rather than individual needs—for example, restoring shared water sources or adapting land-use plans.
- **Complement to (and not a replacement for) FPIC and other rights:** A grievance mechanism can support ongoing dialogue and monitoring but must not undermine Indigenous peoples' rights to Free, Prior, and Informed Consent (FPIC). When positioned appropriately, it can reinforce these rights by providing continuous avenues for feedback and sharing concerns throughout the project's life cycle.

Enabling of Early Identification and Prevention of Harm

Operational grievance mechanisms can capture issues before they escalate, allowing companies to address risks promptly and strengthen trust with rightsholders. At several supplier sites, grievances started being raised and addressed with encouraging levels of worker satisfaction.

- **In the UK site**, the “Speak Up” initiative reduced formal grievances by two-thirds (from 24 in 2022 to eight in 2023) while generating a significant volume of issues raised and resolved informally (60 in 2023), with no comparable baseline available prior to 2023. This demonstrates a clear positive outcome for the business: more issues are being discussed proactively, preventing escalation because concerns are being addressed sooner. The inputs logged through “Speak Up” were wide-ranging, covering everything from workplace challenges to suggestions for improvements. Most importantly, the initiative fostered a culture in which workers feel empowered to speak up and actively participate in decision-making.
- Similarly, **at the agricultural site in Southern Italy**, the first grievances reported were minor, an encouraging sign that trust was starting to build and that workers were beginning to feel safe in speaking up. Such initial, small-scale cases help create the conditions for more significant grievances to be raised over time.

Improved Workplace Atmosphere

Across several suppliers, workers reported feeling more valued as tangible actions were taken in response to their suggestions, contributing to a more positive and productive work environment. The introduction of new engagement practices fostered unprecedented

collaboration between management and workers, leading to noticeably improved relationships at many sites. These suppliers adopted innovative approaches to strengthen worker participation, which proved instrumental in creating a more open, respectful, and supportive workplace culture. At several sites, managers have observed that open dialogue—even when disagreements arise—helps workers feel valued and part of the organization.

Strengthening Trust and Relationships

Fair, transparent, and timely handling of grievances strengthens credibility and fosters long-term, trust-based relationships between workers and management. Supplier sites that kept consistent logs of grievances were able to track issues over time and identify patterns or underlying causes that might otherwise have been overlooked. This ability to spot trends enabled them to address systemic concerns early, demonstrating responsiveness and building workers' confidence that raising issues led to real improvements.

Transparent communication—such as sharing aggregated grievance outcomes, follow-up actions and lessons learned—helps close the feedback loop and shows workers that their concerns were taken seriously while maintaining confidentiality. This openness enhanced credibility and reinforced the perception that worker voices drive meaningful change. Highlighting positive outcomes that resulted from grievance mechanisms, including resolved problems and tangible improvements in workplace practices, further reinforced trust by illustrating the benefits of worker participation.

Shift in Management Mindset

When companies move beyond viewing grievance mechanisms as risk mitigation or compliance tools, they start seeing them as essential instruments for dialogue, accountability, and continuous improvement. Each company that engaged its workers in this process reported gaining value from their input. This shift in mindset toward incorporating the perspectives of workers not only improves the effectiveness of the grievance mechanism but also cultivates a more inclusive and supportive work environment. Ultimately, the companies' willingness to adapt their mindset and acknowledge the significance of involving workers were pivotal factors driving other positive changes.

“It was eye-opening that speaking to employees can give you very valuable feedback, if you give them the right forum to share ideas.”

Company in the UK

2.2 BRAND-LEVEL GRIEVANCE MECHANISMS: STRENGTHENING PEOPLE-CENTRIC ACCOUNTABILITY SYSTEMS

What Brand-Level Grievance Mechanisms Are—and Why They Fall Short

Brand-level grievance mechanisms are systems established by global brands and buyers to identify, address, and resolve human rights and labor issues in their supply chains. They enable individuals or groups, such as factory workers, farmers, or community members, to raise concerns about a brand’s supply-chain practices directly to the company.

These mechanisms fulfill accountability beyond a company’s direct operations, and complement local and supplier-level systems. They are particularly important in contexts where local remedy pathways are absent or unsafe or lack credibility. They can offer alternative routes to remedy for workers in subcontracted, informal, or home-based settings, and can surface critical issues—such as gender-based violence, wage theft, and discrimination—that may otherwise be missed or silenced locally. When effective, they act as a bridge between global sourcing practices and the realities faced by workers on the ground, especially in high-risk sectors.

Brand-level mechanisms take many forms but generally fall into several categories, as described in Table 3.

Table 3. Examples of Brand-Level Grievance Mechanisms

Type	Description	Example
<p>Hotlines and helplines</p> <ul style="list-style-type: none"> Provide a direct, confidential, and accessible channel for reporting issues. Are effective for workers in complex supply chains who may fear retaliation if they report grievances to local management. 	<ul style="list-style-type: none"> Toll-free and confidential: Remove financial barriers and protect the identity of the reporter. Multilingual: Accessible to a wide range of workers, especially migrant workers. Independent or third-party-operated: Build trust by separating the reporting channel from company management. Case tracking: Track the status of reported grievances through to remediation using sophisticated systems. 	<p>PepsiCo’s “Speak Up” hotline covers employees, suppliers, business partners, and communities, and is available 24/7 in multiple languages.</p> <p>PepsiCo’s Agricultural Supply Chain GM complements the general hotline and addresses issues such as palm-oil deforestation, forced labor, and land rights.</p>

Type	Description	Example
<p>Digital tools</p> <p>Provide a modern, low-cost, and scalable method for reporting grievances.</p>	<ul style="list-style-type: none"> • Accessibility: Can be accessed via web portals, mobile apps, interactive voice response (IVR) and SMS, making them suitable for a variety of users and technical capabilities. • Multi-language: works in multiple languages to increase access for migrant workers • Anonymity: Can provide, using digital tools, a high degree of anonymity, which encourages reporting of sensitive issues. • Real-time monitoring: Allows brands to track grievance data and identify systemic issues across their supply chain. • Case management: Can use built-in features as tools to manage the investigation and resolution of reported cases. • Flexible, shared ownership model: Can be configured to support both brand- and supplier-owned grievance mechanisms, with controlled data-sharing that allows suppliers to manage their own systems while selectively sharing insights with brand partners. 	<p>Ulula (part of EcoVadis) is a digital worker-engagement and grievance platform that enables companies to collect feedback, grievances, and social-impact data directly from workers in their supply chains. The platform combines mobile technology, SMS, voice (IVR) and WhatsApp-based reporting with analytics dashboards that allow brands and suppliers to monitor and respond to issues in real time.</p>
<p>In-person or hybrid channels</p> <p>Foster trust and provide support by incorporating direct human interaction, which is particularly valuable in contexts where technology is not widely available or trusted.</p>	<ul style="list-style-type: none"> • Local partnerships: Often run by trusted local NGOs or unions that have existing relationships with workers and communities. • Hybrid approach: Combines in-person reporting with digital record-keeping to ensure that issues are tracked and reported to the brand. • Face-to-face interaction: Allows for more nuanced discussions and context-setting, which can be difficult to achieve over a phone line or app. 	<p>Some companies collaborate with local NGOs to establish worker-voice forums or grievance desks. The NGO staff can assist workers in documenting and submitting complaints, and then formally transmit the issue to the brand itself. Trust in a local partner thereby leads to accessing the brand's power to enforce change.</p>

Type	Description	Example
<p>Third-party-managed systems</p> <p>Ensure the independence and impartiality of the grievance process by having an external entity manage it. Important for building trust with stakeholders, especially in high-risk areas.</p>	<ul style="list-style-type: none"> • Impartiality: Assures neutrality because the third party is not influenced by internal company politics or the supplier’s commercial interests. • Expertise: Draws on the extensive experience and expertise in human rights and labor issues of many third-party providers. • Brand protection: Protects the brand from reputational damage by facilitating early detection and resolution of issues. 	<p>Companies including General Mills and Mondelēz use services like EthicsPoint. A third-party provider handles the intake of reports, routing them to the brand for action under established protocols. The provider ensures that the process is transparent, and sensitive issues are handled with expertise during intake, while the company conducts the actual investigation.</p>
<p>Supplier-linked committees</p> <p>Encourage local-level problem-solving while creating a clear escalation path to the brand for issues that cannot be resolved internally.</p>	<ul style="list-style-type: none"> • Local ownership: Gives worker representatives on committees within the factory or farm a direct voice in addressing local issues. • Tiered escalation: Provides a mechanism for accountability by escalating unresolved issues to brand-oversight structures. • Capacity building: Support and training provided by brands to help suppliers improve their internal grievance processes. 	<p>Some brands mandate that their suppliers establish joint management-worker committees. These committees address local issues, but if a resolution isn’t reached, the issue is passed up to the brand’s social-compliance team, creating a direct link between the local complaint and brand-level accountability.</p>

Despite their potential, brand- and buyer-led mechanisms often fall short in practice. Their effectiveness depends less on format than on whether they are people-centered, trusted, and connected to other parts of the grievance ecosystem. Several common challenges and critical insights emerge from the current landscape:

- **Limited worker awareness:** Workers’ understanding of grievance systems cannot be assumed. Workers often lack knowledge of grievance options or see them as company-controlled. Awareness-building must therefore precede and accompany any grievance-mechanism rollout, not as a one-off activity but as a continuous process that must be reinforced through posters, refreshers, and peer educators.
- **Access and literacy gaps:** Some mechanisms rely only on online submission, excluding low-literacy workers and those without Internet or smartphone access. Low-tech, multichannel options can bridge this divide.
- **Fear of retaliation:** In many settings—especially where gender-based violence or hierarchical control is common—workers fear reprisals for speaking up. Even with non-retaliation policies, many workers fear job loss, threats, or punishment for filing grievances.

- **Lack of in-person options:** Most companies do not provide physical grievance submission options, making it difficult for low-literacy or informal workers to use them.
- **Distance and fragmentation:** When operating in isolation from local, certification, or industry mechanisms, brand-level systems may create duplication or confusion for rightsholders.
- **Weak transparency:** Brands frequently disclose the number of grievances received but provide little information about outcomes, time frames, or rightsholder satisfaction. Very few companies explain what happens after a grievance is filed or share examples of how cases have been resolved.
- **Exclusion of marginalized groups:** Many mechanisms still center on formal, direct employees, leaving out the most vulnerable workers in lower tiers, such as informal and subcontracted workers. Some mechanisms are restricted to employees and suppliers only, excluding local communities or affected rightsholders.
- **Management resistance and buy-in:** Initial skepticism among suppliers and supervisors can hinder worker participation. Gaining cooperation from suppliers is often a precondition for worker access. Trust-building with management—explaining that the GM is an improvement tool, not an audit—can unlock worker participation.
- **Scalability and resourcing:** Effective, human-centered grievance systems are resource-intensive, especially when expanding training and awareness across dispersed supply chains. Scalable systems must rely on shared or collective structures, not brand-by-brand investments alone.
- **Focus on outcome versus compliance:** Cutting ties with suppliers rarely benefits workers. Remedy requires engagement, not disengagement, even when commercial incentives push in the opposite direction. Grievance mechanisms are meaningful only when they lead to tangible improvements.
- **Duplication and supplier fatigue:** As due-diligence laws proliferate, suppliers are increasingly required to comply with multiple brand-specific grievance systems. This duplication confuses workers and overburdens suppliers. In manufacturing hubs such as Vietnam and Indonesia, suppliers may face overlapping requirements from several buyers.
- **Supply-chain transparency and traceability gaps:** Limited visibility into supply chains—and the difficulty of identifying when suppliers are shared across brands—can weaken individual brand leverage. When suppliers are not shared, or when shared relationships are not visible, opportunities for coordinated or joint remediation are significantly reduced.

What Good Looks Like

When brands design grievance mechanisms around people rather than procedures, such mechanisms can shift from static reporting tools to systems that drive accountability and learning. This section highlights some emerging good practices, drawn from the experience of PepsiCo, Kroger and Lidl GB's pilot in India with LRQA, Cargill's grievance mechanism for palm oil, Mondelēz, and Wilmar, gathered through direct interviews and publicly available information.³ The list of examples is not exhaustive, and it is based on available information and existing engagement with some of the companies. In addition, the paper does not endorse any single model and recognizes that each mechanism discussed has its own weaknesses and limitations. However, the concrete good practices described here, taken together, illustrate what is possible in practice.

Build Accessibility and Inclusion into Design

True accessibility requires constant outreach, multilingual options, and human presence where technology cannot reach.

- Several multinational food, agriculture, and consumer-goods companies (e.g., PepsiCo, Cargill, and Mondelēz) operate grievance mechanisms available across dozens of countries and in 20–150+ languages, combining web-based reporting tools with telephone hotlines—including Indigenous language options—to ensure that workers and communities, including those in rural and low-connectivity environments, are not excluded and that linguistic inclusion is built into system design from the outset rather than treated as an optional add-on.
- The **Kroger/Lidl GB/LRQA** pilot demonstrated that inclusive, low-tech, multichannel systems—combining toll-free numbers with WhatsApp, Facebook, or Viber—can reach low-literacy and informal workers who face barriers in accessing digital apps. Calls were answered in local languages by real people, helping demystify the process and build immediate trust.

Foster Trust Through Human Interaction and Non-Retaliation

Trust is the foundation of any effective grievance mechanism. Without it, workers and community members are unlikely to raise concerns, regardless of how well-designed the system appears on paper. Building trust requires deliberate, visible actions that signal safety, accountability, and human connection.

- At the policy level, some companies (e.g., PepsiCo, Cargill, Mondelēz, and Wilmar) begin by reinforcing trust through clear global non-retaliation commitments, explicit expectations for suppliers, and consistent follow-up on zero tolerance for retaliation. Wilmar complements this with a standalone Human

³ For more information about each mechanism, check the following sources (accessed during August–December 2025): [PepsiCo](#); [Kroger and Lidl's pilot with LRQA](#); [Cargill palm oil](#); [Mondelēz](#); [Wilmar](#).

Rights Defenders Policy, which recognises the important role of human rights defenders in raising concerns related to operations and supply chains, and affirms a zero-tolerance approach to threats, intimidation, harassment or retaliation. Other companies include HRD protections within broader human rights policies or statements. When these commitments are communicated clearly and enforced in practice, they help demonstrate that speaking up will not lead to punishment.

- Trust is also strengthened through direct human interaction. In the **Kroger/Lidl GB/LRQA** pilot, for example, training teams included operators who would later receive calls, assuring workers that a known, local person—not an anonymous agent in a call center—would listen. This personal connection reduced fear and encouraged participation. Non-tech-dependent systems can further reinforce trust by combining local-language operators, live responses, and visual or interactive training to demystify grievance concepts, as in this pilot initiative.

Use Leverage to Drive Remedy

Given the significant distance between brands and the lower tiers of their supply chains—where many human rights violations occur—companies often lack the direct control or visibility necessary to deliver remedy themselves. In such contexts, the most responsible approach is not disengagement, but rather the strategic use of leverage to influence suppliers and partners and drive corrective action.



What She Makes campaign. Textile workers are working inside a garment factory in Savar, Bangladesh
Credit: Fabeha Monir/Oxfam

- **PepsiCo**, for example, engages larger buyers to press for change when its own purchasing volume is too small to influence a supplier on its own, rather than withdrawing quietly. This collective pressure increases the likelihood that suppliers will investigate complaints and implement corrective action. In addition to this collective leverage, the company also uses positional leverage (brand influence and visibility) and commercial leverage (conditional engagement or suspension) to reinforce expectations and incentivize remedy.
- In the **Kroger/Lidl GB/LRQA** pilot, several brands jointly backed a third-party grievance mechanism, pooling their leverage to encourage suppliers to participate, investigate complaints, and implement remedies—including changes to workplace policies—despite limited visibility into lower-tier sites. While the initiative was a step in the right direction, it also highlighted that the effectiveness of a grievance mechanism is closely tied to purchasing practices: where brands maintained stable, long-term sourcing relationships (e.g. two years in the case of Lidl GB), the mechanism was better positioned to build leverage and support more systemic responses to grievances. Conversely, shifting sourcing patterns during the pilot limited continuity and weakened the mechanism’s ability to drive consistent follow-up and remedy. These dynamics highlight how short-term contracts and unstable purchasing relationships can undermine sustained leverage and complicate remedy efforts.

Prioritize High-Risk Areas

In complex, multitier supply chains, and with the understanding that a universal or top-down approach is not effective, applying a saliency-based approach can be a viable option. Such an approach can enable companies to focus depth and resources where risks to people are most severe.

- **Cargill**, for example, has a specific procedure for palm-oil production and sourcing, giving context and greater urgency to issues within the sector such as deforestation and peat development. Other grievances can be raised through Cargill’s general procedure, but highlighting palm oil alone has given weight to the heightened risks.⁴
- Other companies have employed similar approaches to focus on the most severe human rights risks and high-impact regions (for example, PepsiCo for palm oil and Southeast Asia) or on the implementation of specific policies (for example, Wilmar through its protocol which operationalizes the “No Exploitation” pillar of its “No Deforestation, No Peat, No Exploitation” commitments and outlines expectations for corrective action, remediation, and protections for vulnerable groups.)

⁴ While this briefing highlights Cargill’s grievance mechanism for palm oil, it is important to note that Cargill is also a major actor in several other high-risk- commodities, including soy, cocoa, maize, and cattle. We cite palm oil here because it is the commodity for which Cargill has developed one of its more mature and publicly documented grievance-mechanism models, making it a useful illustrative example for this briefing.

Deepen Local Partnerships

Local actors, including trade unions, NGOs and community organizations, can act as the bridge between global systems and local realities. While unions remain the primary and legitimate representatives of workers under international labor standards, NGOs and community groups can complement union efforts by improving outreach to informal or marginalized workers and helping ensure that mechanisms are accessible, trusted, and culturally grounded. However, their involvement should strengthen—not replace or bypass—social dialogue and ILO-defined collective rights. Collaborating with this range of local actors helps ensure that mechanisms reach informal or marginalized workers and gain the cultural relevance, trust, and sustainability needed to function effectively.

- The **Kroger/Lidl GB/LRQA** pilot relied on a local implementing partner familiar with worker contexts to ensure cultural relevance and capacity for remediation.
- Companies might also decide to engage with local CSOs and trade unions in high-risk regions (e.g., PepsiCo) or to accept reports of violations from indirect sources, such as NGOs, customers, and public reports by reviewing and investigating concerns raised both inside and outside formal grievance channels (e.g., Wilmar).

Build Supplier Ownership and Capacity

Because many grievances arise—and can be most effectively resolved—at production level, suppliers must have credible internal systems to prevent, receive, and address complaints. Embedding grievance expectations into supplier capacity-building, rather than relying solely on audits, can help shift responsibility from reactive compliance to operational ownership. Vendors and Tier-1 suppliers act as intermediaries between brands and production sites; without their buy-in, awareness-raising, follow-up, and remedy are significantly weakened.

- A growing good practice is to combine clear performance expectations with hands-on support and accountability mechanisms. This can include assessing the quality of suppliers' grievance management and broader human rights processes through structured scorecards (e.g., PepsiCo in palm oil), alongside targeted orientation and on-site follow-up to ensure that management understands its role in supporting worker participation (e.g., Kroger/Lidl GB/LRQA pilot).
- Other companies, such as **Wilmar**, formalize accountability through jointly agreed, time-bound action plans to address verified grievances, including in cases involving labor or community-exploitation grievances, with explicit attention to responsible engagement and follow-through.

Enhance Transparency

Effective mechanisms do more than receive and resolve complaints—they communicate about them. Sharing aggregate data and outcomes helps build trust with rightsholders and civil society and signals that the mechanism is functioning in practice. Transparency should be

understood not as reputational exposure, but as a form of accountability to the people affected.

- A growing practice is the public disclosure of aggregated grievance information through online dashboards (e.g., Cargill), including the number of grievances received, their status, their locations, and—at times—case-level summaries by supplier. However, transparency could be strengthened by providing clearer information on planned future actions, whether rightsholders were satisfied with outcomes, and disaggregated data by complainant profile, where safe and appropriate.
- Similarly, some companies publish on their websites lists of grievances reported, categorizing cases (e.g., grievances that fall within scope, grievances outside of scope, or sector-specific complaints) and providing progress updates and links to relevant reports (e.g., Wilmar). When accompanied by periodic reflection on lessons learned and procedural improvements, such disclosure can support continuous improvement. At the same time, the depth, accessibility, and rightsholder-centeredness of public reporting remain critical factors in determining whether transparency meaningfully advances accountability rather than serving a purely informational function.

Embed Gender Responsiveness

Gender-responsive grievance mechanisms are critical in sectors and/or geographies where women and gender diverse people face heightened risks of harassment and retaliation. Integrating gender analysis into grievance systems ensures that mechanisms address not only the volume but also the quality of access for different groups.

- The approach used in the **Kroger/Lidl GB/LRQA** pilot shows how design choices can help create safer spaces for disclosure:
 - Gender representation in delivery: Female helpline operators reflected workforce demographics, while male trainers were included in the field to reflect gender balance in agriculture.
 - Focused training content: This included dedicated modules on harassment, abuse, and retaliation—issues often underreported in South Asia.
 - Risk prioritization: Retaliation is recognized as a top-severity risk, especially for gender-based harassment cases.

Embed GMs Within a “Grievance Ecosystem”

No single grievance mechanism can reach all affected people or address every type of harm—particularly in fragmented, multitier supply chains. Building an effective “grievance ecosystem” therefore requires collaboration among brands, suppliers, certification schemes, civil society, and local mechanisms. While such cooperation can be complex and slow, collective approaches—such as sharing supplier data, coordinating investigations, and jointly remediating systemic violations—

help distribute responsibility and make remedy more scalable and sustainable. However, a key challenge remains: many certification bodies and multi-stakeholder initiatives still struggle to be fit-for-purpose and genuinely accessible to affected workers, particularly those in informal or lower-tier supply chains.

- **PepsiCo's** current strategy focuses on building a “grievance ecosystem,” linking company channels with certification bodies (such as RSPD and Bonsucro), peer collaboration, and local mechanisms, aiming to create a more coordinated and complementary system of access to remedy.
- **The Kroger/Lidl GB/LRQA** shrimp pilot in India brought multiple brands and vendors together around a shared third-party grievance helpline tailored to low-literacy, remote aquaculture settings. Coordinated case handling and data sharing enabled both individual remedies and systemic improvements, such as introducing written contracts for all workers at a farm. At the same time, shifting sourcing patterns and limited overlap among buyers highlighted the need for coalition or industry-level approaches to sustain access over time.

Potential Impact When Done Right

When these good practices converge, brand-level grievance mechanisms can transform corporate accountability from a compliance exercise into a people-centered access to remedy. They can:

- **Bridge power imbalances:** Connect distant rightsholders—such as farm or factory workers—with global brands.
- **Enable access to remedy:** Offer viable avenues for redress where local mechanisms are weak, inaccessible, or compromised. In the Kroger/Lidl GB pilot, an unpaid-wage case revealed a lack of written contracts. The remedy addressed the individual grievance and informed efforts by management to strengthen contracting practices for farm workers.
- **Surface hidden risks:** Non-audit mechanisms uncovered verbal abuse, retaliation, and harassment cases missed by traditional compliance checks.
- **Drive systemic change:** PepsiCo's grievance mechanism revealed policy gaps (e.g., lack of contracts, lack of wage transparency), feeding into supplier training and policy reform.
- **Organizational learning:** PepsiCo and Cargill review grievance data to identify trends, inform risk mitigation, and feed insights into supplier engagement and human rights due diligence (HRDD). Wilmar conducts regular reviews of case studies to identify lessons learned, using the knowledge gained to refine the grievance mechanism. Cargill's public dashboard and sharing of case information also support sector-wide learning.-
- **Catalyze collective action:** PepsiCo aims to use its positional and commercial leverage to encourage peer collaboration, sector-wide reform, and stronger certification standards.



Cocoa capsule breaking and gum collection (seeds) activity. Credit: RSTP / Oxfam Intermon

2.3 MULTI-STAKEHOLDER AND SECTOR-LEVEL GRIEVANCE MECHANISMS: FROM COLLECTIVE OVERSIGHT TO SHARED ACCOUNTABILITY

What Multi-Stakeholder and Sector-Level Mechanisms Typically Are—and Why They Fall Short

Business partners at different points in the value chain may be involved in a grievance or human rights harm. Coordination among companies—especially where issues involve shared suppliers or complex projects—can enhance leverage, improve consistency in remediation, and help identify and address human rights risks more effectively as they arise.

Harms deeper in the value chain often involve suppliers serving multiple companies, raising questions about which companies should be notified, and which should actively participate in remediation. Collaboration within the industry can help align expectations, facilitate information sharing, and clarify each company’s responsibilities. For example, companies sponsoring large events can work together with governing bodies and host countries to improve worker protections and strengthen grievance mechanisms.

Multi-stakeholder and sector-level grievance mechanisms can be effective in building shared understanding, clarifying expectations, and securing commitments from all actors. When done well, this can bring together diverse actors—companies, NGOs, trade unions, community groups, and sometimes governments—to investigate and resolve complaints, strengthen accountability, and promote systemic change within industries or supply chains. These mechanisms can take various forms, as illustrated in Table 4.

Table 4. Examples of Multi-Stakeholder and Sector-Level Grievance Mechanisms

Type	Description	Example
<p>Sector-wide grievance platforms</p> <ul style="list-style-type: none"> Coordinated by industry associations or multi-company initiatives to address complaints across an entire sector. Can be used for issues that involve multiple companies within the same supply chain or industry, helping to create a more standardized approach to addressing grievances. 	<p>By pooling resources and expertise, companies and stakeholders can develop a more robust mechanism than a single company might create on its own. This can include developing industry-wide standards, training programs, and remediation protocols.</p>	<p>The Fair Labor Association (FLA)</p> <p>The FLA is a multi-stakeholder initiative focused on improving working conditions in global supply chains. It includes a Third-Party Complaint (TPC) process that allows workers and their advocates (such as unions or NGOs) to file a complaint against a factory that supplies products to an FLA member company. If a complaint is accepted, the FLA contacts the sourcing company, which then develops a remediation plan. The FLA may also intervene with its own investigation and corrective action recommendations</p>
<p>Independent grievance offices or ombudsmen</p> <ul style="list-style-type: none"> May be jointly managed by business and civil society, with an independent office or ombudsman overseeing the process to ensure impartiality. Can enhance credibility by providing an avenue for complaints that is separate from any single company. 	<p>The independent nature of the office or ombudsman is crucial for maintaining trust, particularly for sensitive issues. The office receives and investigates complaints, often employing mediation and investigation to resolve issues fairly.</p>	<p>Financial Ombudsman Service (FOS) (UK)</p> <p>The FOS is an independent ombudsman for the UK financial-services industry. It resolves disputes between consumers and financial businesses, including banks, insurers, and lenders. Its services are free to consumers, and its decisions are legally binding on companies if accepted by the customer.</p>
<p>Third-party managed hotlines</p> <ul style="list-style-type: none"> Cover multiple companies or regions by external, independent hotlines. Provide an accessible and often anonymous channel for people to report grievances. 	<p>Using a third-party service can build confidence among workers and community members who may fear retaliation if they report concerns directly to their employer. To make reporting easier, these services often offer multiple communication channels, such as toll-free numbers, text messaging, and online forms.</p>	<p>LRQA “Nossa Voz” (Our Voice) Hotline</p> <p>Operating in Brazil’s coffee and forestry sectors, this hotline provides a safe, confidential, and accessible grievance mechanism for rural and agricultural workers. Managed by LRQA in partnership with the National Rural Workers’ Confederation (CONTAR), Nossa Voz offers multiple channels for workers to seek help or raise concerns via WhatsApp or a toll-free phone line. The system ensures impartial management of complaints and allows anonymity when requested.</p>
<p>Multi-stakeholder forums</p> <ul style="list-style-type: none"> Bring together diverse parties to discuss grievances and design joint solutions. Prioritize collaboration and dialogue over a formal adjudicative process. 	<p>These forums foster ongoing dialogue between stakeholders instead of a single, formal complaint-resolution process. The goal is to address systemic issues and find collective solutions that benefit everyone involved. This can involve setting up committees to jointly investigate issues or working together to create industry-wide policy changes.</p>	<p>The Better Cotton Initiative (BCI)</p> <p>The BCI is a multi-stakeholder initiative that includes farmers, ginners, suppliers, manufacturers, retailers, and CSOs. The BCI has its own grievance process that allows anyone involved in its activities to raise a complaint. Apart from its formal complaint process, the broader initiative serves as a forum in which stakeholders can discuss standards, concerns, and improvements, including promoting decent work and safe conditions through its principles and criteria.</p>

In principle, MSMs are designed to deliver independence, legitimacy, and collective leverage, enabling actors across global value chains to jointly address systemic risks such as forced labor, unsafe conditions, gender-based violence, and environmental degradation—problems that no single company can solve alone.

However, in practice, many MSMs fall short of their transformative potential. They often mirror the power and resource imbalances that define global supply chains, except when these are explicitly recognized and managed from the outset, and they face some common challenges:

- **Complex governance and slow decision-making:** Bringing together brands, suppliers, unions, NGOs, and sometimes donors or governments often results in complex governance structures. Efforts to achieve consensus can lead to slow decision-making, procedural gridlock, and diluted focus on rightsholders' needs. When remedies for urgent issues such as workplace safety or harassment are delayed, trust erodes and credibility weakens.
- **Resource constraints and limited scope:** Most MSMs rely on voluntary contributions or donor funding, making them vulnerable to shifting corporate priorities or project cycles. Limited and unstable funding constrains their capacity, sustainability, and responsiveness. Without predictable resources, mechanisms cannot maintain legitimacy or deliver timely, effective remedy.
- **Weak rightsholder participation:** Many MSMs involve workers and communities primarily as users or data sources rather than as actors who help decide how the mechanism is designed or governed or how remedies are determined. Mechanisms designed without rightsholder input risk missing key contextual realities, weakening legitimacy and relevance, and reproducing the same power hierarchies they seek to redress.
- **Distance from local context:** Global or sectoral mechanisms often operate far from the realities of rightsholders. Language, literacy, and cultural barriers—compounded by fear of retaliation—make many mechanisms inaccessible. Accessibility requires more than open channels; it demands cultural and contextual embedding. Mechanisms distant from workers' lived realities risk being irrelevant or unsafe to use, and lack of accessibility and cultural sensitivity in turn directly undermine legitimacy.
- **Corporate reticence and transparency gaps:** Companies are often hesitant to share supply-chain data or remediation outcomes because of competitive or legal sensitivities such as fears of liability, breaches of confidentiality agreements, data-privacy restrictions, and potential defamation risks. This limits transparency, prevents collective learning, and undermines accountability. Data gaps prevent the identification of root causes and block learning, joint action, and collaboration across cases, undermining the potential of MSMs to drive systemic change rather than piecemeal fixes.
- **Tick-box exercises and procedural compliance:** Some initiatives prioritize visible procedures—such as surveys, audits, and “worker-voice” apps—over substantive outcomes. Engagement

can become symbolic, aimed at demonstrating compliance rather than securing remedy. In some sector-wide programs, worker-voice tools collect data without follow-up. Workers may respond to polls but rarely see their results, leading to fatigue and skepticism.

What Good Looks Like

While no single MSM has achieved the full vision of a rights-holder-centered grievance and remediation system, a range of initiatives demonstrate complementary elements of good practice. Collectively, these show that legitimacy and accessibility stem from proximity to rightsholders, while predictability and impact rely on stable governance, transparency, and shared accountability. Building on these insights, good practice in MSMs lies in bringing a genuinely people-centered approach: designing and governing mechanisms around the needs, realities, and agency of those most affected by corporate conduct.

The rest of this section offers insights from implementation of real-world MSMs: the International Accord, the Fair Wear Grievance Mechanism in apparel, the Issara Institute (cross-sector, cross-country), and the most recent Appellando in Spanish agriculture. Each case highlights emerging good practices (and some persistent challenges).

International Accord for Health and Safety in the Textile and Garment Industry

The International Accord for Health and Safety in the Textile and Garment Industry (International Accord) is a sector-level mechanism that aims to promote safety and health and provide access to remedy in the home textile and garment industry. It is a legally binding agreement between 293 global garment brands and retail companies, and international trade unions (IndustriALL Global Union and UNI Global Union). It commits signatories to ensure safe workplaces for workers in the textile and garment supply chain. The origins of the International Accord lie in the Rana Plaza building collapse that occurred in Bangladesh in 2013. The International Accord provides for independent inspections and remediation of building and fire-related safety hazards. It also supports worker participation in safety and health through its safety training program and independent complaints mechanisms – workers from Accord-covered factories can raise health- and safety-related concerns without fear of retaliation.

The International Accord currently implements two “Country-Specific Safety Programs” (CSSPs) in Bangladesh and Pakistan. In Bangladesh, the program is implemented by the Ready-Made Garment Sustainability Council (RSC). In Pakistan, the Pakistan Accord on Health and Safety in the Textile and Garment Industry, implements the Accord agreement. The Accord is governed by a Steering Committee comprising representatives of signatory brands and Global Unions, with a neutral chair appointed by the International Labour Organization (ILO).

Fair Wear (apparel sector)

The Fair Wear (FW) is a multi-stakeholder initiative that advances workers' rights across global supply chains by embedding human rights and environmental due diligence into everyday business practice.

FW's grievance mechanism is designed to give workers a direct, safe line to raise concerns—often anonymously—about labor-rights violations in factories producing for its member brands. When a worker submits a complaint via a local “trusted complaint handler” on the ground, the case is initially reviewed by Fair Wear to confirm that it falls under their mandate. From there, Fair Wear forwards the complaint to the relevant brand, which is expected to engage with the factory and rightsholders to investigate and remediate the issue. Worker representatives or unions may be involved, and legal steps can be supported if needed. The identity of the complainant is safeguarded throughout the process.

Issara Institute (multi-sector)

The Issara Institute is an independent nonprofit organization active in Asia and beyond, specializing in worker-voice systems, ethical recruitment, grievance mechanisms, and supply-chain transparency.

Issara operates multilingual helplines, messaging platforms, and smartphone apps (for example, the “Golden Dreams” app) through which workers in sectors ranging from garments to agriculture can report abuses on a range of issues, including forced labor, unethical recruitment, unsafe working conditions, and harassment. The organization partners with global brands, recruitment agencies, employers, and CSOs to ensure that complaints lead not only to individual remediation but also to root-cause analysis and systemic improvement in labor-rights practices.

Appellando (agriculture supply chains, initially in Spain, now expanding to South Africa, Italy, and Morocco)

Appellando is a multi-stakeholder initiative developing an industry-wide grievance mechanism for supply chains in sectors such as fresh fruit and vegetables. Launched in 2024, it is a joint initiative led by German retailers, established in response to due-diligence obligations under the German Supply Chain Act.

Its aim is to ensure that all rightsholders—especially migrant and seasonal workers facing language or literacy barriers—have access to a trusted channel for reporting complaints without each company needing its own system. Working with retailers and producers (implementation started in Spain and is now expanding beyond), it supports independently operated hotlines and grievance procedures aligned with participating companies. Worker grievances enter a central system, are shared with relevant buyers, and are handled by an independent investigator. Cases are designed to be escalated as needed—from initial supplier engagement to more formal investigation, and ultimately to buyer intervention where appropriate. In principle, systemic or repeated violations would be prioritized for sector-level analysis in order to identify and address patterns of harm. As the system is still in the early stages of implementation, its escalation pathways are only beginning to be tested in practice, particularly with respect to identifying and acting on systemic risks.

Worker-Centered Design and Governance

Effective MSMs embed rightsholders as co-designers, monitors, and decision-shapers. This means integrating rightsholder participation into design, governance, monitoring, and feedback loops.

- **The International Accord** institutionalized trade-union participation in its governance structure, giving unions formal decision-making power. The Accord model shows that worker involvement in both governance and monitoring strengthens legitimacy, ensures credibility, and keeps safety issues at the center
- **The Issara Institute** integrates worker voice through technology-enabled and multilingual channels—not just to collect complaints but to shape remediation, seek to address the root cause of issues, and inform policy reform. Workers’ feedback is systematically incorporated into buyer engagement and supplier improvement plans, reinforcing workers’ agency. Issara’s model provides multiple safe channels for migrant workers to report abuses and influence outcomes, ensuring that rightsholder voices shape both case resolution and systemic improvements. Issara similarly emphasized collaboration over punishment, offering suppliers technical support and capacity-building instead of punitive measures, and providing an evidence base for continuous improvement. This approach is intended to build trust and encourage suppliers to strengthen their own grievance systems while maintaining accountability to workers.
- **Fair Wear (FW)** complements these models by embedding local civil-society and union representatives as country-level complaint handlers, ensuring that workers’ concerns are handled by trusted intermediaries familiar with their context. This form of delegated participation aims to strengthen both trust and local legitimacy.
- In **Appellando**, trade unions and CSOs took part in designing the mechanism, and initial worker training is recognized as critical. While digital training exists, personal contact remains important for trust-building. Approaches have included (1) personal links via trusted local contacts or video messages, and (2) collaboration with local CSOs that have already earned workers’ trust.

Accessibility Through Safe Localized Channels

Accessibility depends on the provision of multiple, safe, and culturally appropriate entry points, as well as having low thresholds for the information required and protection of anonymity/confidentiality and against retaliation. These channels include hotlines, messaging apps, email, in-person reporting options, and local civil-society partners and ensuring cultural proximity, linguistic accessibility, and both physical and psychological safety. Wherever trust in a hotline or formal process is limited or unlikely, companies should engage intermediaries—such as CSOs, human rights defenders, and trade unions—that can help bridge the gap and facilitate access.

- The **Accord**'s safety complaint mechanism is a lifeline for Bangladeshi garment workers from Accord-covered factories, offering anonymous, local-language channels to report matters related to occupational safety and health. Workers are directly informed about their rights and responsibilities under the Accord and the Complaints Mechanism during All Employee Meetings conducted in factories as part of the Accord's Safety Training Program. Complaints may be filed by phone, message, email, or in person. The credibility of its complaint mechanism is derived from formal the involvement of trade unions in the institutional structure, conducting independent and impartial investigations and delivering remedy for complaints found to have merit.
- The **Issara Institute** has made accessibility a design principle. Its in-person engagements, cross-border coverage (for example operating at the first mile before migrant workers depart for job opportunities), toll-free helplines, social media, and messaging apps operate in multiple languages and are co-promoted by local CSOs and migrant networks. This local embedding ensures that workers in complex, informal, or high-mobility sectors (such as fishing or manufacturing) can reach trusted intermediaries without fear. Issara's independence and worker empowerment approach, combined with its collaboration with CSOs and local trade unions, unlocks trust, uncovers the realities that are taking place on the group, and encourages use by vulnerable groups such as migrant workers.
- In **Appellando**, complaints may be submitted via multiple channels—phone, email, website, social media, or in-person—through licensed Operational Grievance Mechanism partners authorized by Appellando. This multi-channel model is reinforced by farm-level contact points and local CSO partners who help build trust, verify complaints, and encourage use of digital tools, blending technology with human presence. Training is delivered primarily through Sustify's digital modules to selected workers, supervisors, and administrative staff. As the model evolves, strengthening trust and collaboration with CSOs and trade unions—which play a key role in supporting workers and encouraging uptake—will remain an important factor in ensuring that workers feel safe, informed, and able to use the mechanism confidently.

Collective Grievances

Multi-stakeholder mechanisms provide forums where workers and communities can bring group complaints, amplifying voices that might otherwise remain silent.

- The **Accord**'s complaint process allows trade unions or others to file collective complaints as well as complaints by individual workers.
- **Issara**'s trusted channels give migrant workers and CSOs space to safely represent shared grievances without fear of retaliation.

Independence and Credibility

MSMs' credibility depends on both independence from corporate control and binding commitments that guarantee follow-through. Rightsholders must trust that the complaints process be free of any undue influence by any party.

- The **Accord** set the benchmark for independence through a legally binding agreement between brands and trade unions, enforced through arbitration and the ability of the complaint mechanism to conduct independent investigation and to make decisions on the outcomes of complaints that are enforceable. Its governance structure—with an independent secretariat, transparent data publication, and enforceable brand obligations—ensured both autonomy and accountability.
- The **Issara Institute** maintains its independence by operating as a neutral third-party platform, not controlled by brands or suppliers. It manages grievances confidentially, mediates between workers and employers, and reports outcomes transparently. Real-time monitoring and analytics of what is happening across supply chains brings transparency, and support buyers, suppliers, and recruitment agencies to be recognized for their actions. Issara's independence has built trust among migrant workers, CSOs, and progressive brands alike.
- **Fair Wear** safeguards its independence through its tripartite governance model, combining brands, unions, and NGOs. Its complaint investigations are conducted by independent local handlers and publicly reported—a rare practice that enhances transparency and credibility.
- **Appellando** strengthens its credibility by introducing monthly retailer reviews, in which retailers align on research priorities, monitor implementation, and review outcomes. Retailers collectively track which farms are on-boarded, how many buyers are involved, and the associated costs. Aggregated data—including the number of complaints, resolutions achieved, and geographic “heat maps”—are shared once confidentiality thresholds are met, reinforcing confidence in the integrity of the process.

Sustainability and Coordination

For multi-stakeholder grievance mechanisms to function effectively in practice, companies must ensure that they are designed for long-term sustainability and coordinated operation. This requires predictable resourcing, shared governance arrangements, and aligned systems that enable consistent oversight and follow-up across actors and over time.

- The **Accord** ensures long-term sustainability through its legally binding agreement which includes a funding model in which signatory brands contribute according to an established fee structure. Signing the Accord carries a financial obligation⁵.

⁵ For more see: <https://internationalaccord.org/about-us/fee-structures/>

- **Appellando**'s membership-based cost-sharing model and shared data infrastructure create a coordinated, sustainable mechanism. Retailers jointly finance onboarding and case-management costs for the suppliers they source from, embedding the mechanism in regular business operations and incentivizing long-term maintenance. A minimum twelve-month supplier-engagement period, with annual reassessments, supports continuity in fast-moving, seasonal industry. In parallel, Appellando strengthens coordinated oversight by sharing aggregated supplier data under agreed confidentiality thresholds and by using common identifiers (e.g., Global G.A.P. numbers) for consistent tracking. Its shared platform, linking all participating retailers through a unified complaint interface, enhances traceability and oversight, though full harmonization across buyers remains resource-intensive and ongoing.
- **Issara** strengthens sustainability and coordination by integrating continuous worker-voice monitoring with structured partnerships linking workers, CSOs, suppliers, and global buyers.

Timely, Rights-Compatible Remedy

Effective grievance mechanisms are measured by outcomes—not only by the number of cases received, but also the speed, fairness, and quality of the remedies delivered. Remedy must be timely, transparent, and rights-compatible, addressing actual harm rather than merely demonstrating procedural compliance.

- The **Accord** grievance mechanism asks complainants what their proposed remedy is and has in place mechanisms to ensure that remedy is delivered. In cases involving fire and building safety and other technical hazards, it is the Accord engineers/trained experts who determine the remedy and not the complainant.
- The **Issara Institute** ensures that each individual complaint informs broader supplier engagement and industry-level reform, using case data to identify root causes, strengthen the system, and feed into the policy dialogue. This makes the mechanism both reactive and preventive – identifying emerging risks and mitigating them before they escalate.
- **Fair Wear** also demonstrates good practice in that each complaint triggers an investigation, a corrective-action plan, and follow-up verification by local staff. Its practice of publishing complaint outcomes and timelines fosters accountability and predictability.

Continuous Learning and Systemic Change

Good-practice MSMs move beyond providing remedy for individual complaints to contributing to identifying root causes in order to drive structural improvements, turning grievances into insight for systemic reform. Aggregated data analysis and transparency are central to this

shift from case management to providing a means to drive systemic change.⁶

- The **Issara Institute** analyzes, categorizes and anonymizes data directly received from workers, totaling on average over 17,000 signals from workers per month to detect emerging and ongoing risks—such as recruitment fees or document retention—and uses these insights to convene brands and suppliers around individual or collective remediation and longer-term reform.
- **Fair Wear** systematically reviews complaints to inform brand performance assessments and develop preventive guidance and training. Its public complaint database promotes cross-learning among member brands and increases visibility into patterns of risk.
- **Appellando** classifies and analyzes grievance data by geography, demographics, and response times, using these insights to inform sourcing and procurement decisions. While this analysis is not publicly disclosed, linking data trends to commercial decision-making can help align supplier incentives with human rights outcomes. At the same time, supplier reluctance to share information—often because of confidentiality concerns and fear of commercial repercussion—remains a constraint. In practice, setting agreed thresholds for aggregated data sharing (e.g., across a minimum number of farms) has proven essential for building trust and protecting privacy while enabling learning. Appellando also conducts regular evaluations to refine its approach.

Escalation Pathways

For a multi-stakeholder grievance mechanism to be effective, clear escalation pathways and the ability to trigger a collective response are crucial. Without these features, serious or systemic issues can fail to receive the attention they deserve, undermining the mechanism’s purpose and leaving affected parties with no effective recourse.

Escalation pathways provide a structured, multilevel process for handling grievances. This ensures that complaints are first addressed at the most appropriate level but can be moved to a higher level of authority if they are not resolved satisfactorily or require more senior input. The process must clearly define the criteria for escalation. This could be triggered by failure to resolve an issue within a specified time frame; dissatisfaction with the proposed resolution; the issue’s severity, scale, or potential for wider impact; or suspicions of retaliation against the complainant.

- The **Issara Institute** illustrates how structured escalation pathways connect worker-led reporting to broader leverage. Grievances raised through local hotlines, social-media channels, or CSO partners are analyzed, and anonymized (workers can elect to remain anonymous or not) so that they can be actioned by

⁶ The experience of the Roundtable on Sustainable Palm Oil (RSPO) is relevant here. RSPO operates a Grievance Mechanism Tracking System within its broader complaints framework. While the tracking system itself is internal, RSPO maintains a public complaints portal that provides information on ongoing and closed cases. The portal categorizes complaints and enables stakeholders to monitor case status at an aggregate level, contributing to the transparency and predictability of the mechanism (<https://rspo.my.site.com/Complaint/s/>).

factory/employer management, allowing suppliers to remediate issues directly while worker safeguards are in place. When cases are more serious, such as forced labor, or there is a lack of progress, Issara escalates findings to its Strategic Partners (who source from the site) individually, or provide options for coordinated, multi-buyer remediation. This layered escalation pathway ensures that problems are resolved at the most effective level—locally, collaboratively, or systemically—thereby strengthening predictability, reducing duplication and compliance fatigue for suppliers, and reinforcing coherence across operational, brand, and sector-level mechanisms.

- **Appellando** also offers a good example of an escalation pathway. The GM attempts to resolve the grievance at the company level, engaging with the company and complainant in finding a solution (level 1). If internal resolution is unsuccessful or cannot be achieved in a timely or adequate manner, the complaint may be escalated to the help channel (level 2), then to higher levels involving an expert committee (level 3), buyer companies (level 4), and a National Multi-Stakeholder Dialogue (level 5).

Potential Impact When Done Right

When designed and governed around the realities and agency of rightsholders, multi-stakeholder grievance mechanisms can generate outcomes that go far beyond individual case resolution. By linking effectively with factory, supplier, and brand-level systems, they can create a predictable, multilayered ecosystem for remedy with meaningful, sector-wide impact. For example:

- **Stronger, more reliable access to remedy:** MSMs provide credible escalation pathways when company-level systems fail, ensuring that rightsholders have somewhere to turn when internal processes break down.
- **Sector-wide accountability and learning:** By aggregating grievances across companies, MSMs can identify recurring patterns of harm—such as wage theft, discrimination, or harassment—and analyze these trends to reveal the underlying root causes driving them, whether related to purchasing practices, recruitment systems, or management structures. This enables more targeted, systemic interventions that improve conditions across entire industries rather than isolated worksites.
- **Reduced burden and clearer expectations for suppliers:** Shared oversight, aligned standards, and transparent data reduce duplication and “audit fatigue” while strengthening accountability to rightsholders and clarifying what responsible practices look like across a sector.
- **Systemic reach and collective leverage:** By pooling resources, expertise, and authority, MSMs enable coordinated responses to entrenched challenges—such as forced labor, gender-based violence, and unsafe conditions—that no single brand or supplier

can address alone. Cross-brand collaboration creates shared visibility into recruitment practices and working conditions across borders, making it possible to identify and tackle abuses that are otherwise difficult to trace or remediate.

- **Continuous improvement and policy influence:** By analyzing grievance data and trends, MSMs convert individual complaints into systemic insights. These insights help shape due diligence, strengthen supplier practices, and inform policy reform. Initiatives that emphasize data sharing, retailer alignment, and long-term engagement (e.g., minimum twelve-month commitments) can enhance predictability and trust—though challenges such as cost-sharing and transparency remain.
- **A shift toward prevention and systemic change:** When functioning well, MSMs build industry-wide norms of remediation, responsible sourcing, and collaboration. This collective approach encourages companies to move from reactive fixes toward preventive action and structural improvements that reduce harm over time.



Rajlakshmi workers (India) – Credit: Júlia Girós / Oxfam Intermón

3. GRIEVANCE MECHANISMS ON FISHING VESSELS—A NEW FRONTIER



Why Fishing-Vessel Grievance Mechanisms Fall Short

Grievance mechanisms are particularly critical in the seafood sector, where working conditions can be isolated, hazardous, and difficult to monitor. Fishing—especially on distant water fleets—combines many of the risk factors associated with forced labor and severe labor exploitation: long periods at sea, migrant crews, complex subcontracting arrangements, and limited external oversight. In such contexts, access to a safe and effective channel to raise concerns can be of vital importance, as it is often one of the only options available to workers seeking support or remedy.

Yet, the development of effective grievance mechanisms on fishing vessels has lagged behind such sectors as garments and, increasingly, agriculture and food supply chains. The unique characteristics of this sector make both access and remedy significantly more difficult.

Extended periods at sea limit workers' ability to access in-person grievance channels, while restrictions at port—such as lack of visas or confiscation of passports by captains—can further prevent workers from reaching support services. Unpredictable landing times—and sometimes unpredictable locations—also make coordination with onshore services difficult. Although reliable connectivity at sea is essential for workers seeking to report concerns remotely, many vessels lack consistent or affordable internet access. In addition, serious power disparities on board heighten the risk of retaliation for raising grievances. The concentration of authority in the hands of captains, combined with workers' economic dependency and, in some cases, irregular migration status, heightens the risk of retaliation for speaking up. Even when grievances are received, determining appropriate responses (e.g., when or whether a vessel should return to port to address an issue) can be complex.

What Good Looks Like

As part of this research, no business-operated grievance mechanism was identified that was both fully aligned with the core principles outlined in this document and comprehensively tailored to the realities of fishing vessels. Nonetheless, a number of promising elements are beginning to emerge, and selected examples are highlighted below. This gap is particularly important given the growing recognition of the need for effective grievance mechanisms on fishing vessels and the increasing

efforts by industry actors and others to develop guidance that responds to its specific challenges.⁷

Effective grievance mechanisms are people-centered—designed and governed in close consultation with rightsholders, adapted to their realities, and grounded in trust, while ensuring practical follow-through. This includes co-designing systems with workers and communities to ensure that channels are relevant, accessible, and safe, and ensuring the presence of trusted human intermediaries—such as multilingual hotline operators or port based- liaison officers—who can support workers in navigating processes and overcoming barriers linked to language, literacy, power imbalances, or distrust. Some of the key elements of such a system, similar to those developed in other contexts than seafood, would include:

- **Worker education and awareness-raising** through rights-based outreach and training tailored to the fishing context.
 - **Destructive Fisheries Watch (DFW)** established the National Fishers Center Indonesia digital platform as an online information, education, and case-complaint service that can be utilized by fisheries workers, fishers, and fisheries boat crews online, via a hotline or by dropping into DFW worker centers. DFW has carried out extensive outreach to fishers to increase their awareness of their rights and responsibilities and to instruct them on how to access the service.
 - Educational videos have been created by the Taiwan Fisheries Agency in a range of languages that cover topics related to contracts, working conditions, rights and responsibilities, and the health and safety risks of fishing. They outline ways in which crew members may lodge a complaint, including an in-country hotline and a number to call if outside of Taiwan, and explain where Taiwanese Fisheries Agency officers are stationed abroad and who is available to help them if necessary.⁸
- **Involvement of trade unions—or, where not possible, trusted CSOs**—in providing optional independent support and guidance to people raising grievances, is crucial for trust and worker well-being.

⁷ Recent initiatives illustrate this growing focus. The Seafood Task Force has launched a Global Grievance Mechanism project for tuna fishermen following the introduction of new standards mandating grievance mechanisms for Fishery Improvement Projects ([Advancing Our Work with Grievance Mechanism & Worker Voice | Seafood Task Force](#)). More broadly, the Certification and Ratings Collaboration has undertaken a research project, in partnership with Issara Institute and supported by the ISEAL Innovations Fund, to identify solutions for improved worker engagement mechanisms across the seafood industry ([Worker Engagement in Seafood – Certifications and Ratings](#)).

And Global Labor Justice has developed guidance on Wi-Fi access and fishers' rights on distant water fishing vessels. Model Operational Guidelines for Wi-Fi Access and Fishers' Rights on Distant Water Fishing Vessels, February 2025 ([WiFi Guidelines 2025_02.pdf](#)).

⁸ Global Seafood Alliance, What Is the Expectation of Worker Voice and Grievance Mechanisms on Certified Fishing Vessels? April 2023, <https://www.globalseafood.org/wp-content/uploads/2023/07/Worker-Voice-on-Fishing-Vessels-Report.pdf>.

- **In Iceland, trade unions** have representatives on vessels and collective-bargaining agreements that set out a grievance policy as well as other agreed standards on working conditions.⁹
- **In South Africa’s industrial fishing sector**, unions often place representatives on board vessels, providing crew—especially local workers—with an independent and trusted point of contact for raising concerns. Ongoing efforts also explore how foreign crew unions could be linked to local unions to ensure that migrant workers have similar support.¹⁰
- **Multi-channel access**, combining mobile tools, SMS, in-person reporting, and digital platforms, available in local languages and adapted for low-literacy users. But technological solutions must be aligned with what workers already use (e.g., WhatsApp) and accessible in their own languages.
 - **In the Scottish White Fish Producers Association (SWFPA)** model, workers had WhatsApp groups organized by nationality, alongside an app and 24/7 hotline channels, enabling peer support and allowing grievances to be reported both at sea and on land.
- **Continuous improvement** using feedback loops to monitor and address systemic issues to prevent recurrence.
 - **In SWFPA**, the system tracks trends by vessel, nationality, and agency to identify recurring issues and enable SWFPA to stop sourcing from problematic vessels. Unfortunately, this information, which would increase considerably the predictability of the mechanism, is not publicly available.
- **Connectivity at sea**, through equipping vessels with Wi-Fi or satellite communication to enable contact with grievance channels while offshore. But connectivity alone is insufficient: Wi-Fi must be free, secure, and accessible.
 - In Thailand, the USAID Asia Counter-Trafficking in Persons program led by Winrock International partnered with Mars Petcare to pilot a communication technology to improve connectivity and safety for fishers at sea.¹¹
 - The Global Seafood Alliance (GSA) highlights in its research on worker voice how FCF Co. Ltd set up a grievance-reporting channel for fishermen that vessel crew can access using their phones through using a QR code that the company expects vessels to provide on board in crew-accessible areas. However, the mechanism will only be effective when crew members can access the internet; 90% of grievances have been reported when the vessel was in port rather than at sea. The research highlighted the need for an independent review of the mechanisms.¹²

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

- **Combining land- and vessel-based systems.** Grievance mechanisms need to combine vessel-based systems, which require Wi-Fi as noted above, and in-person systems whereby trusted organization or worker centers can provide confidential support.
 - South Africa’s multi-channel system and the presence of Wi-Fi on vessels allows workers to choose between the skipper, vessel owner, union representatives (on board or in port), and a national safety authority, the South African Maritime Safety Authority (SAMSA). Crew also have the opportunity to contact other organizations in port. The existence of multiple worker-aligned entry points reflects mechanisms shaped around worker preferences and real-world access points.
- **Independent management of grievance mechanisms**, rather than relying on vessel captains, to ensure impartiality and trust. Robust confidentiality and protection measures should include anonymous reporting, anti-retaliation safeguards, and secure data management. Workers need to be able to access regulatory authorities for the most serious abuses or risks, directly or via their chosen intermediaries.
 - **Research by DFW** in Indonesia highlights how one collective-bargaining agreement sets out how a union representative on board a vessel will support workers in filing grievances through presenting grievances to the boat hierarchy.¹³



Fitri carries out the process of sorting shrimp from tiger prawns purchased from farmers to be sent to PT Atina.
Credit: Iqbal Lubis/Oxfam

¹³ Work at Sea Project and DFW Indonesia, Potentials and Challenges for Indonesia-based Migrant Fish Worker Organizations, November 2025, <https://dfw.or.id/policy-paper-potentials-and-challenges-for-indonesia-based-migrant-fish-worker-organizations/>.

- In South Africa, when submitting grievances, crew can be anonymous.
- **In SWFPA’s** crewing portal and app, workers have direct access to trained staff in emergencies, while information is provided to them on how to contact all relevant authorities, and Wi-Fi on board vessels enables them to contact them.

The examples above show that some building blocks are emerging, even if the sector as a whole is still far from providing grievance mechanisms that meet workers’ needs at sea. Promising practices—such as improved connectivity, multilingual support, and cooperation with unions and civil society—demonstrate what is possible when initiatives are shaped around fishers’ lived realities. Yet significant gaps remain. None of the models identified include clear procedures, predictable timelines, or transparent follow-up, nor do they offer guidance on core issues such as how grievances against captains are handled or when a vessel should return to port. Likewise, no current approach links vessel-level, brand-level, and multi-stakeholder mechanisms into a coherent system. These shortcomings underscore the need for continued experimentation, rigorous worker engagement, and stronger collaboration across the industry so that emerging efforts can evolve into grievance systems that genuinely support safety, dignity, and remedy for fishers.



Gold mine rock is put on a metal tray for washing (Kenya). Credit: Victor Wahome/Oxfam

4. ROAD MAP TOWARD A LAYERED ECOSYSTEM OF GRIEVANCE MECHANISMS



A layered ecosystem of grievance mechanisms enables companies to provide predictable, safe, and effective pathways for rightsholders to raise concerns and access remedy across the value chain. Rather than operating in isolation, operational, brand/buyer, and multi-stakeholder mechanisms function as interconnected parts of a system. Together, they create a “ladder of remedy” whereby issues can surface early, escalate appropriately, and lead to both individual redress and structural improvements. However, the mere existence of grievance mechanisms at these different levels does not in itself ensure coordination or complementarity. Without deliberate design, these mechanisms can remain fragmented or duplicative, or can even undermine one another. Achieving coherence requires careful alignment of roles, clear escalation pathways, and structured information flows across actors.

Box 3. Connecting the Layers

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

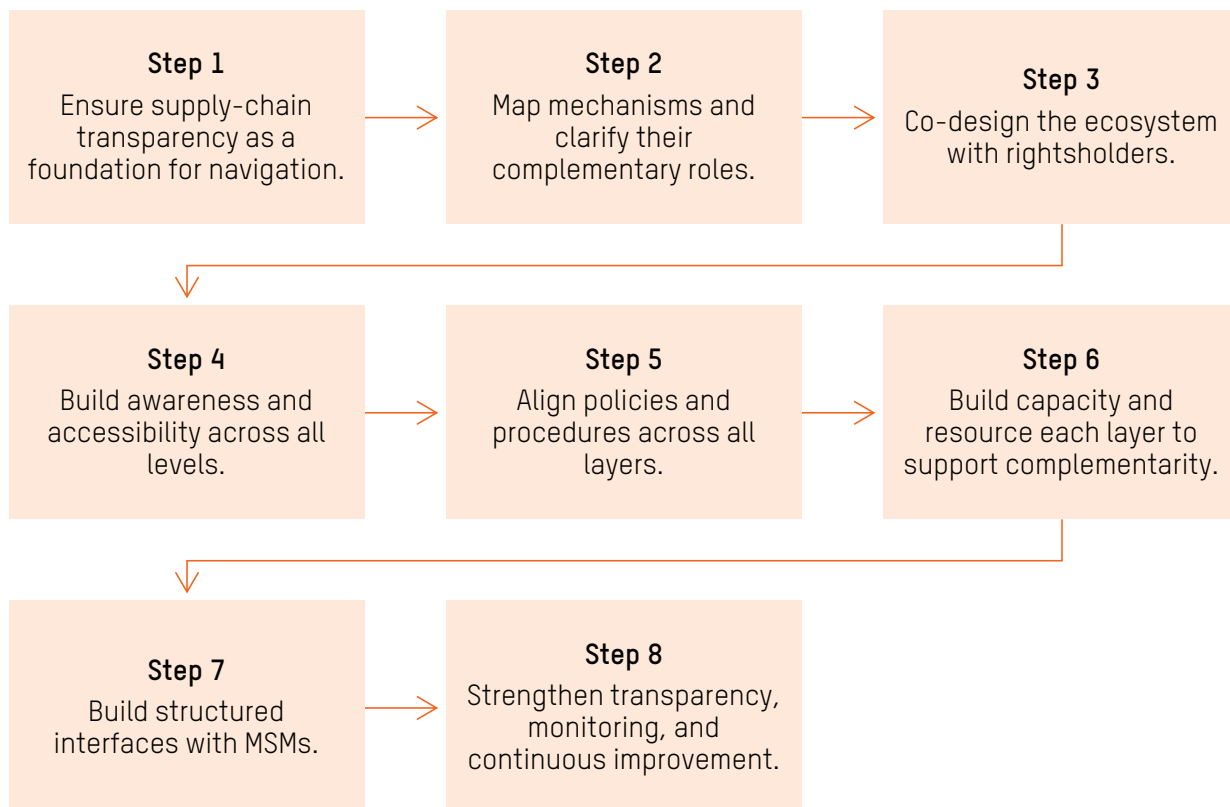
- **Operational-level mechanisms:** Handle immediate local harms, and provide the closest, fastest option for resolving issues.
 - **Gaps:** Limited independence, low trust among vulnerable groups, retaliation risks, inability to address buyer-driven or system-wide harms.
- **Brand/Buyer-level mechanisms:** 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.

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.

Figure 2. Roadmap for Companies Sourcing in Global Supply Chains



Step 1 – Ensure supply-chain transparency as a foundation for navigation.

Visibility of supply chains is essential so that rightsholders know where to raise concerns.

Actions for global buyers/brands:

1. Map suppliers beyond Tier 1 and disclose them publicly.
2. Require suppliers to disclose subcontractors and recruitment intermediaries.
3. Share supply-chain information with MSIs, unions, and trusted organizations so that rightsholders know which mechanism applies to which facility.

Result: Rightsholders, suppliers, buyers, and MSIs all have the visibility needed for effective navigation and complementarity.

Step 2 — Map mechanisms and clarify their complementary roles.

Each company must understand existing grievance channels and the distinct function of each layer.

Actions for global buyers/brands:

1. Map all grievance mechanisms across company operations, suppliers, business partners, and MSIs:
 - Assess their scope, accessibility, trust levels, and actual usage by rightsholders.
 - Include informal channels (worker leaders, unions, community groups).
 - Identify gaps in missing grievance mechanisms and any blind spots in existing ones (rightsholders or issues that should be included but fall out of the scope of existing mechanisms).
2. Clarify the role of each mechanism:
 - Operational: Immediate, localized harms resolved close to the source.
 - Buyer: Purchasing-practice issues, recurring issues across sites, or cases escalated from suppliers.
 - MSI: Systemic, cross-border, or multi-actor harms requiring independence or collective action.
3. Establish predictable escalation criteria:
 - When suppliers should escalate unresolved cases to buyers.
 - When buyers or rightsholders should escalate cases to MSIs.
 - When rightsholders may bypass lower levels for safety or independence.

Result: A company sourcing in global supply chains has a clear understanding of how each mechanism should fit into the ecosystem, how cases currently move through it (or don't), and visibility over gaps and blind spots that can be addressed in next steps.

Step 3 — Co-design the ecosystem with rightsholders.

Mechanisms function best when designed with—not for—rightsholders.

Actions for global buyers/brands:

1. Clarify how suppliers, buyers, and MSIs contribute to co-design with rightsholders, with collaboration organized by geography and/or commodity as needed:
 - Suppliers co-design operational-level systems with direct participation of rightsholders.
 - Buyers co-design brand-level systems with input from supplier and rightsholder (e.g., workers, farmers, communities).

- Companies collaborate with legitimate representatives of rightsholders (e.g., trade unions) and civil society in MSIs to strengthen sector-wide grievance functions.
2. **Conduct co-design processes** to review existing mechanisms, fill identified gaps, and outline escalation pathways (when missing) with workers, unions, women’s groups, migrant-worker organizations, and community partners.
 3. **Identify practical and cultural barriers** that rightsholders face in each mechanism.
 4. **Create reporting options** that reflect these needs, including trusted intermediaries (unions, NGOs, community leaders) who help rightsholders navigate mechanisms safely.

Result: Mechanisms reflect reality, increase trust, and improve usability across the ecosystem.

Step 4 – Build awareness and accessibility across all levels.

Navigation only works when rightsholders understand their options.

Actions for global buyers/brands:

1. **Define communication responsibilities:**
 - Suppliers explain operational channels and internal escalation.
 - Buyers explain their own mechanism and escalation into MSIs.
 - MSIs clarify how rightsholders can file complaints directly with them.
2. **Communicate the grievance ecosystem clearly,** including:
 - What each mechanism is for.
 - How to use it safely.
 - When and how to escalate.
 - The right to access MSIs directly.
3. **Ensure multiple entry points at each level:**
 - In-person reporting, hotline/SMS, mobile apps, peer focal points, anonymous boxes, local NGOs.
 - Gender-responsive options and mechanisms accessible to migrant workers.

Result: Rightsholders know how to choose the safest and most effective pathway for their situation.

Step 5 — Align policies and procedures across all layers.

Consistency enables smooth escalation and prevents grievances from getting “stuck.”

Actions for global buyers/brands:

1. Adopt a corporate-wide grievance policy based on UNGPs and OECD guidance, covering all rightsholders—not only direct employees.
2. Align intake, investigation, confidentiality, retaliation protections, and remedy processes across operational, buyer, and MSI levels.
3. Ensure that supplier procedures explicitly reference buyer and multi-stakeholder mechanisms to support upward referral.
4. Reduce duplication and strengthens coordination through a single digital infrastructure that can serve multiple brands and stakeholders, avoiding the need for parallel systems, lowering costs, reducing worker confusion, and improving the consistency and effectiveness of grievance resolution.
5. Align closure requirements and follow-up expectations across the ecosystem.

Result: Mechanisms share core principles and processes, enabling predictable and coordinated responses.

Step 6 — Build capacity and resource each layer to support complementarity.

Roles and navigation only work when all actors can fulfill their responsibilities.

Actions for global buyers/brands:

1. **Train suppliers** on running safe operational-level mechanisms, identifying retaliation, and escalating appropriately.
2. **Strengthen buyers’ own capacity** to identify purchasing-practice-related harms and to determine when MSI involvement is needed.
3. **Strengthen MSM capacity** by investing in investigation teams, translation, outreach, local access points, and case management.
4. **Support rightsholder groups**—unions, NGOs, community organizations—in providing accompaniment and safe-navigation support.

Result: Each level has the competence and resources required to function as part of an integrated system.

Step 7 – Build structured interfaces with MSMs.

MSIs must be formally linked to company mechanisms, not used only as a last resort.

Actions for global buyers/brands:

- 1. Define clear triggers** for referring cases to MSMs, such as:
 - Multi-supplier or multi-brand cases.
 - Cross-border recruitment issues.
 - Sector-wide patterns.
 - Retaliation or safety concerns.
 - Failures at operational or buyer levels.
- 2. Implement case-sharing and escalation protocols** between buyer mechanisms and MSIs.
- 3. Coordinate corrective action and remedy** through MSIs when individual leverage is insufficient.
- 4. Ensure that rightsholders can file directly with MSMs** without needing to exhaust company-level mechanisms first.

Result: MSIs function as an integrated, upper-level mechanism rather than an external or disconnected option.

Step 8 – Strengthen transparency, monitoring, and continuous improvement.

A layered system evolves and improves through learning.

Actions for global buyers/brands:

1. Track and analyze grievances across all levels to identify trends, root causes, and escalation patterns.
2. Publish anonymized, aggregated data, building on information shared by each mechanism, in order to build trust and accountability.
3. Engage rightsholders in reviewing the effectiveness of all mechanisms.
4. Test escalation pathways regularly to ensure that they work in practice.
5. Use insights to improve due diligence, purchasing practices, supplier engagement, and sector-wide collaboration.

Result: The ecosystem becomes a dynamic, learning-oriented system rather than a static set of tools.

Conclusion: A Layered and People-Centered Remedy Ecosystem

By following this road map, companies shift from viewing grievance mechanisms as compliance-driven or isolated processes to understanding them as a coordinated ecosystem that:

- Reaches rightsholders wherever they are.
- Responds proportionately at the right level.
- Builds trust through safe and accessible pathways.
- Enables remedy and long-term prevention.
- Leverages cross-company and sector-wide collaboration.

The result is a grievance architecture that is predictable, transparent, inclusive, and aligned with rightsholders' realities—as envisioned by the UNGPs.

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ABOUT OXFAM

Oxfam is a global movement of people who are fighting inequality to end poverty and injustice. We are working across regions in more than 70 countries, with thousands of partners, and allies, supporting communities to build better lives for themselves, grow resilience and protect lives and livelihoods also in times of crisis. Please write to any of the agencies for further information or visit www.oxfam.org.

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