

# GRIEVANCE MECHANISM RESPONSIBLE SOURCING JOURNEY

## INTRODUCTION

Grievance mechanisms are an important part of a businesses' obligations under the United Nations Guiding Principles on Business and Human Rights (UNGPs). The UNGPs set out that where companies have caused or contributed to an impact, they have a responsibility to provide or contribute to remedy for those that have been affected. An effective grievance mechanism provides companies with a process for systematically receiving, investigating and responding to rightsholder complaints and implementing remedy to solve them. Grievance mechanisms should sit within a broader stakeholder engagement approach, offering multiple opportunities for rightsholders to raise concerns and/or provide feedback.

This document provides a framework to embed an efficient grievance mechanism in line with the UNGPs. It provides a blueprint to help AIM Progress members accelerate the development and implementation of their grievance mechanisms to provide remedy and prevent future adverse impact through systemic remediation, and continuous improvement.

### Framework steps

The framework is divided in 4 steps:

1. Building the governance of the grievance mechanism, including within your own operations and engagement within your supply chain
2. Establishing the grievance mechanism, including developing and communicating the mechanism
3. Implementing the grievance mechanism, including establishing the operating procedure, implementing remediation and its monitoring
4. Evaluating the grievance mechanism and integrating learnings

Each step includes a short introduction establishing the scope, the relevant UNGP effectiveness criteria covered and their definitions.

### Maturity levels

To fit within the wider AIM Progress Responsible Sourcing Journey framework, there are four levels of maturity within each step: Launched; Established; Integrated; Leadership. Criteria within the first maturity level (Launched) have been designed as stepping stones to get started on the journey and are listed in order of priority. The criteria across each maturity levels are cumulative, meaning that they build on one another, therefore a maturity level can only be met if the criteria within the previous levels have been covered.

## How to use the framework

This framework was developed by AIM Progress using various guidance documentation, standards and benchmarks and updated by twentyfifty, following a consultation with AIM Progress Advisory Board. The framework may be used as a benchmark tool or as blueprint to further embed and improve a grievance mechanism and its management systems. The framework is for any company that wants to strengthen their grievance mechanisms whether they are a brand or a supplier.

While this document covers key considerations to build and embed a grievance mechanism, it is by no means exhaustive. We encourage you to consult additional guidance documents (see Annex) and engage with other AIM Progress members to share learnings and best practice.

There are two other documents to complement this framework that should be used in conjunction. Firstly, this framework is available in an excel spreadsheet to act as a self-assessment tool. This allows you to systematically check off each point per section that you have completed to see where you may have gaps and opportunities for improvement. There is also a guidance document that details examples of grievance mechanisms with practical tips and best practice examples from companies that are leading the way to help bring the tool to life.

This document contains a number of technical terms marked with an asterisk (\*) and definitions of these terms can be found in the Annex.

## 1. BUILDING THE GOVERNANCE OF THE GRIEVANCE MECHANISM

**OWN OPERATIONS.** This section covers the governance of the mechanism at your own operations level, including policies related to raising grievances, process to manage grievances, and roles and responsibilities. The UNGP effectiveness criteria in scope are:

- **Legitimate:** The grievance mechanism enables the trust of the users for whom they are intended and are accountable for the fair conduct of grievance processes.

	<i>Launched</i>	<i>Established</i>	<i>Integrated</i>	<i>Leadership</i>
<b>OWN OPERATIONS</b>	<p>We are committed at leadership level to developing and implementing effective grievance mechanisms at the operational and supplier levels.</p> <p>We have one or more channels for communicating a grievance (own, third party or shared) which our employees can use to raise complaints or concerns including in relation to human rights issues.</p> <p>We have a clear statement to non-retaliation making clear that complainants will not be disadvantaged or punished as a result.</p> <p>We have a clear statement that the company does not impede access to state-based mechanisms* and does not impede access by competent authorities investigating and adjudicating credible allegations of human rights impacts.</p>	<p>We have committed our grievance mechanisms will work towards the UNGP effectiveness criteria.</p> <p>We have a clear process in place for managing grievances with an indicative timeframe for each stage of the process.</p> <p>We have clear, designated roles and responsibilities for both the department and individual personnel assigned to the mechanisms.</p> <p>We have procedures in place to protect complainants' personal data and protect them against retaliation, loss of earnings or prejudice of any kind.</p> <p>We have one or more channels for communicating grievances (own, third party or shared) through which employees and external individuals or communities directly or indirectly impacted by our activities, or by individuals or organisations acting on our behalf, can raise complaints or concerns.</p>	<p>We have a single coordination point accountable for managing the grievance process, who assesses and assigns the grievance, formally acknowledges it, and outlines the processing timeline.</p> <p>We define clearly who manages the process and the role and responsibilities of each person and organisation involved in the process.</p> <p>We appropriately train employees responsible for handling incoming grievances to ensure grievances are handled in a timely, consistent, systematic, and impartial manner.</p> <p>We ensure women employees have the option to speak with a female representative when raising a sensitive gender-based grievance.</p> <p>We monitor compliance with our policy on non-retaliation against complainants.</p>	<p>We have clear and detailed end-to-end process in place on how complaints are assessed and assigned, acknowledged, investigated, resolved, followed up on, and closed.</p> <p>We have a grievance committee set up to enable the process to be overseen by a broader group of internal stakeholders which is representative of the workforce (language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.)</p> <p>We have a specific procedure in place for gender-based grievances such as sexual harassment and discrimination. It guarantees strict confidentiality, the involvement of women workers in the process and a timely resolution*.</p> <p>We engage with other AIM Progress members to discuss and resolve complex issues that cannot be resolved alone to define a joint approach and response.</p>

**SUPPLIER ENGAGEMENT.** This section covers governance at the supplier-level, including their own site-level grievance mechanisms.

<p style="text-align: center;"><b>SUPPLIER ENGAGEMENT</b></p>	<p>We indicate in our supplier code of conduct, contract, or equivalent document our requirement that our suppliers need to:</p> <ol style="list-style-type: none"> <li>1. Develop their own grievance mechanisms (own, third party or shared) through which workers, affected communities and small-scale farmers can raise complaints or concerns including in relation to human rights issues.</li> <li>2. Commit to non-retaliation, making clear that the person who submits a grievance will not be disadvantaged or punished as a result.</li> <li>3. Not to impede access to state-based mechanisms* and not to impede access by competent authorities investigating and adjudicating credible allegations of human rights impacts.</li> </ol>	<p>We support our suppliers when they already have one or more grievance mechanisms in place, by helping them map the process, understand how it is or is not being used, and identify any gaps, including groups it might not be relevant to, and potential grievances it might not appropriately cover.</p> <p>We support our suppliers in developing their own grievance mechanisms and process for handling grievances.</p>	<p>We support our suppliers in making their grievance mechanisms available to all external individuals or communities directly or indirectly impacted by their activities, or by individual or organisations acting on their behalf, can raise complaints or concerns including in relation to human rights abuses.</p> <p>We support our suppliers in improving their grievance mechanisms based on the maturity criteria of the Development and Implementation stages.</p> <p>We support our suppliers in monitoring the performance of their grievance mechanisms, based on the maturity criteria of the Evaluation and Continuous Improvement stage.</p>	<p>We ask our key suppliers (high risk, strategic) to provide us a report on the type and number of grievances received, the remedy provided, the outcomes and on how they deal with issues raised.</p> <p>We ask our key suppliers to evaluate the effectiveness of their grievance mechanisms and share the planned or proposed changes made to systems and procedures to prevent future adverse impacts.</p>
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## 2. ESTABLISHING THE GRIEVANCE MECHANISM

**DEVELOPMENT.** This section covers the development of the grievance mechanism, including stakeholders to engage. The UNGP effectiveness criteria in scope are:

- **Based on dialogue:** Individuals or groups for whom the grievance mechanism is intended are involved in the development and performance of the grievance mechanism. Dialogue is used as the means to address and resolve grievances.

	<i>Launched</i>	<i>Established</i>	<i>Integrated</i>	<i>Leadership</i>
<b>DEVELOPMENT</b>	<p>We map the ecosystem* of grievance mechanisms relevant to our business, including:</p> <ol style="list-style-type: none"> <li>1. Individuals or groups of people who might be affected directly and indirectly by our business activities</li> <li>2. Where they may be typically located</li> <li>3. What types of grievances they could potentially raise with our business</li> <li>4. Any ways in which the groups identified can currently contact our business about concerns they may have.</li> </ol> <p>We map the process of our grievance mechanisms, understand how it is or is not being used, and identify any gaps, including groups it might not be relevant to, and potential grievances it might not appropriately cover.</p> <p>We adapt our existing grievance mechanisms to the ecosystem* based on the individuals or groups who might be affected, where they are typically located, the political and cultural context, and the type of channels that are the most appropriate for each individual and group to report grievances.</p>	<p>We consider existing mechanisms to collaborate with service providers when appropriate and avoid excessive multiplication of grievance mechanisms to ensure effectiveness.</p> <p>We engage with potential users* to design grievance mechanisms relevant to their group, location and potential grievances.</p>	<p>We actively seek to address potential barriers (language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.) to raise grievances within the design of our grievance mechanisms.</p> <p>We respect the role of trade unions and other forms of workers' organisations and engage with them in the design, development, implementation or performance of the mechanisms when relevant and possible.</p>	<p>We actively engage with trade unions, potential users* and external experts in the design, development, implementation, and performance of the mechanisms to improve legitimacy, accessibility, efficiency and build confidence.</p> <p>We regularly provide feedback to stakeholders on how their inputs have been considered, taking into account the situation and possible vulnerability of the stakeholders when sharing feedback.</p>

**ACCESSIBILITY & AWARENESS.** This section covers the accessibility and communication of the grievance mechanisms to potential users\*. The UNGP effectiveness criteria in scope are:

- **Legitimate:** The grievance mechanism enables the trust of the users for whom they are intended and are accountable for the fair conduct of grievance processes.
- **Accessible:** The grievance mechanism is known and accessible to all potential users\* and offer adequate support to those who may face barriers to access.
- **Equitable:** Users have reasonable access to information, advice and expertise. They can participate in a grievance process in a fair, informed and respectful way.

	<i>Launched</i>	<i>Established</i>	<i>Integrated</i>	<i>Leadership</i>
<b>ACCESSIBILITY &amp; AWARENESS</b>	<p>We have mapped specific characteristics of potential users* including language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, awareness.</p> <p>We inform all our employees of the existence of the grievance mechanism(s) at the time they are hired, and inform them that complaints can be submitted anonymously, and that confidentiality is respected.</p> <p>We display information about the grievance mechanism(s) on site and employees are updated on a regular basis of its availability and how to use it.</p>	<p>We clearly, widely and regularly communicate about the existence of grievance mechanism(s) to potential users* and how to use it, including in the main language(s) spoken.</p> <p>We communicate about the mechanism through the recognised trade union or other workers' organisations when it exists and encourage them to promote it to potential users*.</p> <p>We create multiple access points to the grievance mechanism(s) to ensure awareness and accessibility (considering language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.).</p>	<p>We engage with local stakeholders including civil society groups to improve awareness and accessibility among groups facing potential barriers as well as vulnerable groups.</p> <p>We provide regular training to employees to ensure they are aware of and can access the grievance mechanism(s).</p> <p>We provide training that includes awareness of gender-based grievances and how to raise these grievances.</p> <p>We provide training that is available in variety of languages to ensure all workers can understand the information.</p>	<p>We run dedicated awareness-raising sessions on grievance mechanisms for women potential users* and provide safe spaces for women to meet and discuss.</p> <p>We encourage worker and union representatives present during training to help workers with future complaint processes if needed. They also are able to raise concerns on behalf of workers who contact them.</p>

### 3. IMPLEMENTING AND MONITORING THE GRIEVANCE MECHANISM

**PROCEDURE.** This section covers how grievances are handled including roles and responsibilities. The UNGP effectiveness criteria in scope are:

- **Predictable:** The grievance mechanism ensures a clear and known process with an indicative timeframe for each stage and clear information on available types of procedures and outcomes.
- **Transparent:** The grievance mechanism keeps the parties to a grievance informed about progress and provide sufficient information about performance of the grievance mechanism.
- **Equitable:** Users have reasonable access to information, advice and expertise. They can participate in a grievance process in a fair, informed and respectful way.
- **Rights-compatible:** The grievance mechanism ensures that the outcomes and remedies comply with internationally recognised human rights.
- **Based on dialogue:** Individuals or groups for whom the grievance mechanism is intended are involved in the development and performance of the grievance mechanism. Dialogue is used as the means to address and resolve grievances.

	<i>Launched</i>	<i>Established</i>	<i>Integrated</i>	<i>Leadership</i>
<b>PROCEDURE</b>	<p>We accept anonymous grievances and respect confidentiality regarding the individuals who submitted a complaint and we do not share or reveal its content.</p> <p>We do not require complainant to waive their rights to bring a claim through judicial process.</p> <p>We appoint an investigator who has the relevant knowledge and expertise to investigate the complaint and determine who needs to be consulted. The facts which led to the grievance, who the responsible party is, and the desired remedy are established in dialogue with the complainant.</p> <p>We inform the complainant about the grievance process, roles and responsibilities, and timeframe. We keep them informed of the progress of the procedure.</p>	<p>We provide access to assistance and representation (trade union, person of same gender, anyone the complainant may choose).</p> <p>We prioritise grievances related to human rights and cases where we have reasonable doubt that the complainant or other persons may be at risk.</p> <p>We investigate allegations diligently, promptly, impartially, with due consideration to confidentiality.</p> <p>We have an appeal process allowing for issues to be elevated to a review committee, an independent moderator or third party.</p> <p>We ensure the investigator can demonstrate awareness of gender issues and influence of unconscious bias in investigations.</p>	<p>We identify whether complainants come from vulnerable marginalised groups and take it into account during the handling of the complaint.</p> <p>We integrate or link existing channels for receiving complaints such as trade union/workers organisations/industrial relations processes, audit process (workers interviews), worker voice tools, maintaining confidentiality.</p> <p>We have appointed a diverse group of potential user representatives to investigate grievances related to discrimination, mistreatment, harassment, or abuses based on language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.</p>	<p>We give explanations and report on the result of the grievance at the site where the grievance took place, maintaining confidentiality, to ensure transparency, improve legitimacy and build confidence in the mechanisms.</p> <p>We appoint an expert, independent third party to investigate the complaint. The third party has awareness and experience of intersectional issues (language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.) and influence of unconscious bias in investigations.</p>

**REMEDY IMPLEMENTATION AND MONITORING.** This section covers how the remedy procedure is developed, implemented and monitored. The UNGP effectiveness criteria in scope are:

- **Rights-compatible:** The grievance mechanism ensures that the outcomes and remedies comply with internationally recognised human rights.
- **Based on dialogue:** Individuals or groups for whom the grievance mechanism is intended are involved in the development and performance of the grievance mechanism. Dialogue is used as the means to address and resolve grievances.

	<i>Launched</i>	<i>Established</i>	<i>Integrated</i>	<i>Leadership</i>
<b>REMEDY IMPLEMENTATION AND MONITORING</b>	<p>We map the ecosystem* for remediation*, including key stakeholders and existing remediation*.</p> <p>We identify beforehand how to remedy different scenarios and, where possible, consult with external experts and potential users* around proposed remedy for different scenarios.</p> <p>We monitor the procedure end-to-end (from receipt of the grievance to closure) and compliance with agreed actions on remedy.</p> <p>We identify the desired remedy in dialogue with the complainant, and we ensure that outcomes and remedies are in accordance with internationally recognised human rights guidance and adopt the higher standard in case of conflict with national legislation.</p> <p>We systematically collect feedback from the complainant regarding the implementation of the remedy and the outcome.</p>	<p>We combine different tools and approaches to implement the remedy to address the specific nature of each individual grievance, for example if a complainant is from a vulnerable or marginalised group.</p> <p>We ensure our appeal process is communicated effectively and the proposed remedy is to the satisfaction of the complainant and respond to his/her/their needs.</p> <p>We provide different channels and support to appeal the proposed remedy if the complainant is not satisfied.</p> <p>We ensure the remediation plan* is implemented in a timely manner.</p> <p>We require regular reports on implementation by the party against which the complaint was lodged.</p>	<p>We consult the complainant and/or its appointed representative to co-develop the remediation plan*. The plan includes corrections and actions to address the root causes. The action plan protocol promotes dialogue and mediation to support resolution*. We consider existing remediation channels when co-developing the remediation plan*.</p> <p>We appoint an independent third party to monitor the implementation of the remediation plan*.</p> <p>We monitor existing channels for receiving complaints such as trade unions/workers organisations/ industrial relation processes, audit process (workers interviews), worker voice tools.</p>	<p>We identify and engage with local stakeholders and organisations, including women's rights organisations, to provide appropriate support to those affected.</p> <p>We share publicly our remediation plan* for severe grievances, including the process, actions and timelines, via the most appropriate communication channel and ensure confidentiality.</p> <p>When impacts cannot be remedied alone, we collaborate with other AIM Progress members, if relevant, as well as other peers and partners to provide remedy.</p> <p>We identify any adjustments that might be required, whilst monitoring the implementation of the remediation plan*, to reflect changing understandings of how to prevent the grievance from being repeated.</p> <p>We help and propose other channels/organisations, to resolve the issue if we failed to provide a satisfying solution to the complainant (e.g. ombudsman, OCED National Contact Point, legal action...)</p>

## 4. EVALUATING A GRIEVANCE MECHANISM AND INTEGRATING LEARNINGS

**EVALUATION AND CONTINUOUS IMPROVEMENT.** This section covers the review of the grievance mechanism, including the process to evaluate and improve its effectiveness, and the reporting procedure. The UNGP effectiveness criteria in scope are:

- **Based on dialogue:** Individuals or groups for whom the grievance mechanism is intended are involved in the development and performance of the grievance mechanism. Dialogue is used as the means to address and resolve grievances.
- **Transparent:** The grievance mechanism keeps the parties to a grievance informed about progress and provide sufficient information about the performance of the grievance mechanism.
- **Based on continuous learning:** Relevant measures are in place to identify lessons for improving the mechanism and preventing future grievances and harms.

	<i>Launched</i>	<i>Established</i>	<i>Integrated</i>	<i>Leadership</i>
<b>EVALUATION AND CONTINUOUS IMPROVEMENT</b>	<p>We regularly review our mechanisms to understand how it is used or is not being used, identify any gaps, including groups it might not be relevant to, and potential grievances it might not appropriately cover, and determine what should be improved.</p> <p>We systematically collect feedback from complainants regarding the grievance handling process and outcome.</p> <p>We monitor the impact of our grievance mechanisms using complainant feedback.</p>	<p>We set KPIs to monitor and assess the performance of the mechanisms. KPIs are set for both the department and individual personnel assigned to the mechanisms, at own operations and at supplier engagement level.</p> <p>We have a centralised system that records all grievances received, outcomes and user feedback. The data is disaggregated per gender and vulnerable groups and is used to assess performance against KPIs.</p> <p>We report internally on the performance of our mechanisms, including number of grievances filed, topics, and number of grievances resolved.</p>	<p>We have a formal review process including interviews with potential users, particularly women and vulnerable or marginalised groups, and the use of worker voice tools.</p> <p>We publicly disclose on the performance of our mechanisms, including number of grievances filed and resolved, how remedy was provided and how they grievances were resolved.</p> <p>We report on lessons learned to internal stakeholders and changes made to policies and systems to prevent future impacts.</p> <p>We use our evaluation to enhance ongoing human right due diligence and inform our worker engagement strategy.</p>	<p>We have an independent third party in charge of evaluating our mechanisms and taking into account the voice of potential users and complainants.</p> <p>We are using our experiences from operating the mechanisms to improve its functioning over time and to adapt other relevant management processes, including purchasing practices when grievances are coming from supply chain.</p> <p>We continuously seek ways to take part and support remedy collaboration when the grievances are systemic and cannot be remedied alone.</p> <p>We have been able to prevent the reoccurrence of similar grievances by addressing their root causes.</p>

# DEFINITIONS

## UNGP criteria - A grievance mechanism should be:

**Legitimate:** The grievance mechanism enables the trust of the users for whom they are intended and are accountable for the fair conduct of grievance processes.

**Accessible:** The grievance mechanism is known and accessible to all potential users and offer adequate support to those who may face barriers to access.

**Predictable:** Providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation.

**Equitable:** Users have reasonable access to information, advice and expertise. They can participate in a grievance process in a fair, informed and respectful way.

**Transparent:** The grievance mechanism keeps the parties to a grievance informed about progress and provide sufficient information about the performance of the grievance mechanism.

**Rights-compatible:** The grievance mechanism ensures that the outcomes and remedies comply with internationally recognised human rights.

**Based on continuous learning:** Relevant measures are in place to identify lessons for improving the mechanism and preventing future grievances and harms.

**Based on dialogue:** Individuals or groups for whom the grievance mechanism is intended are involved in the development and performance of the grievance mechanism. Dialogue is used as the means to address and resolve grievances.

## Other definitions:

**Ecosystem:** The network of individuals and groups, who they are and how they are connected to a business and its activities.

**Independent third-party:** A party that is impartial and independent, and not connected with the company, or persons of the company, or with any of its subsidiaries.

**Internationally recognised human rights:** The UNGPs make clear that the International Bill of Human Rights and the International Labour Organisations (ILO) Declaration provide the basic reference points for businesses in understanding what human rights are, how their own activities and business relationships may affect them, and how to ensure that their prevent and mitigate the risk of negative impacts on people. The [1948 Universal Declaration of Human Rights](#) drawn up by representatives from many nations to prevent a recurrence of the atrocities of the Second World War, is the cornerstone of modern human rights law. At the World Conference on Human Rights in Vienna in 1993, all 171 participating countries reaffirmed their commitment to the aspirations expressed in that document. Together with the [International Covenant and Civil and Political Rights of 1966](#) and the [International Covenant on Economic, Social and Cultural Rights](#) ratified by over 150 states in 1966, these three documents are known as the “International Bill of Human Rights”. Regarding workers’ human rights, the [International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#) commits all its member states to four categories of principles and rights: freedom of association and the right to collective bargaining; the elimination of compulsory labour; the abolition of child labour; and the elimination of discrimination in respect of employment and occupation.

**Non-retaliation:** Principle or practice of not taking negative actions (i.e. revenge) against someone who has acted in their own right.

**Operational-level grievance mechanisms:** Mechanisms accessible directly to individuals and communities who may be adversely impacted by a business and its activities . They are typically administered by enterprises, alone or in collaboration with others, including relevant stakeholders. They do not require that those bringing a complaint first

access other means of recourse. They can engage the business directly in assessing the issues and seeking remediation\* of any harm. Operational-level grievance mechanisms perform two key functions regarding the responsibility of businesses to respect human rights: first they support the identification of adverse human rights impacts as a part of a business' ongoing human rights due diligence; second, these mechanisms make it possible for grievances, once identified, to be addressed and for adverse impacts to be remediated early and directly by the business, thereby preventing harms from compounding and grievances from escalating.

**Potential users:** Potentially affected stakeholders such as employees, contract workers, workers in the supply chain, smallholder farmers and their families, members of the community around a business facility or site, consumers or end-users. Stakeholder engagement should be inclusive with concern for the perspectives of marginalised and vulnerable groups such as women, children, indigenous peoples, migrant workers and people with a disability.

**Remediation:** The process of providing remedy for a negative human rights impact and to the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

**Resolution:** The process of preventing a negative human rights impact from being repeated. This includes identifying the potential root causes, including gaps or necessary amendments within existing policies, procedures and other management systems.

**Remediation plan:** The actions that act out how remedy will be provided and the steps that will be taken to prevent the grievance from being repeated (i.e. resolution\*).

**Stakeholder engagement or consultation:** An ongoing process of interaction and dialogue between a business and its potentially affected stakeholders that enables the business to hear, understand and respond to their interests, concerns, including through collaborative approach.

**State-based grievance mechanisms:** Mechanisms that may be administered by a branch or agency of the State, or by an independent body on a statutory or constitutional basis. They may be judicial or non-judicial. State-based judicial and non-judicial grievance mechanisms should form the foundation of a wider system of remedy. Within such a system, operational-level grievance mechanisms can provide early stage recourse and resolution\*. State-based and operational-level mechanisms, in turn, can be supplemented or enhanced by the remedial functions of collaborative initiatives as well as those of international and regional human rights mechanisms.

# REFERENCES

## *Guidance and background*

- [Global Compact Network Germany, “Worth Listening: Understanding & implementing human rights grievance management”, 2019](#)
- [Shift, “Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights”, 2014](#)
- [Shift, Oxfam and Global Compact Netherlands, “Doing Business with Respect for Human Rights: A guidance tools for companies”, chapter 3.8, 2016](#)
- [CSR Initiative, Harvard Kennedy School, Cambridge, “Piloting Principles for Effective Company-Stakeholder Grievance Mechanism: A Report of Lessons Learned”, 2011](#)
- [International Council on Mining and Metals \(ICMM\), “Handling and Resolving Local-Level Concerns and Grievances”, 2019](#)
- [Compliance Advisor Ombudsman \(CAO\), “Grievance Mechanism Toolkit”](#)
- [Ipieca, “Worker grievance mechanism. Guidance document for the oil and gas industry”, 2019](#)
- [Shift, IHRB, “ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights”, “VI. Remediation and operational-level grievance mechanisms”, 2014](#)
- [Ethical Trading Initiative, “Access to Remedy. Practical Guidance for Companies”, 2019](#)
- [Aidan McQuade, “Grievance mechanisms, remedies and trade unions: a discussion document”, 2017](#)
- [Jesse Hudson, Mark Winters, “NGO Leadership in Grievance Mechanisms and Access to remedy in Global Supply Chains”, 2017](#)

- [Ergon, “Access to remedy - operational grievance mechanisms”, 2017](#)
- [CERNO, “Government Approach to Remedy for Workers What can Companies Learn?”, 2017](#)

## *Benchmark and standard:*

- [Fairtrade, “Fairtrade Textile Standard”](#)
- [FLA, “Workplace compliance benchmark”](#)
- [Rainforest alliance, “Guidance E: grievance mechanism” - sustainable agriculture framework](#)
- [Corporate Human Rights Benchmark, Methodology 2020, Remedies and grievance mechanisms](#)
- [World Benchmarking Alliance, “Social Transformation Framework”](#)

## *Reporting standard:*

- [Global Reporting Initiative 103 Management Approach](#)
- [UNGP Reporting Framework](#)

## *Gender-sensitive Grievance Mechanism and Due Diligence:*

- [CARE International, “Guidance Note 2: Grievance Mechanisms”, 2020](#)
- [Ethical Trading Initiative, Gender Equality \(B\), Gender and Human Rights Due Diligence](#)
- [Girls Advocacy Alliance, A Gender Responsive Due Diligence Tool, 2020](#)
- [Oxfam GRAISEA, “Women’s Human Rights and Business”, 2020](#)
- [Women Win, Gender-Responsive Due Diligence](#)