AIMprogress | Ethical Trading Initiative | Oxfam Business Advisory Service



Designed with and for workers:

Joint Lessons from AIM-Progress, Ethical Trading Initiative and Oxfam Business Advisory Service on worker-led grievance mechanisms

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Key takeaways

- **Most grievance mechanisms fail to involve rightsholders (and their representatives)** in their design and implementation, thus limiting trust and transparency.
- **The process of setting up matters as much as the mechanism itself,** and rightsholders need to be actively involved in the process.
- **Integrating grievance mechanisms into social dialogue and worker representative structures** provides a trusted and legitimate pathway for recourse, strengthening collective bargaining and empowering workers with an institutionalized voice.
- Creating an **enabling environment** is necessary, where brands and stakeholders provide support through commitment, understanding, and access to resources, without limiting the independence and credibility of the process and eventually the mechanism itself.
- **Shifting mindsets** from viewing grievances as "problems" to seeing them as *valuable insights and opportunities* for improvement can help companies strengthen relationships with workers, farmers, and communities.
- **Move beyond viewing grievance mechanisms as tools like hotlines or apps** – they are *not tick-box solutions* but *ongoing processes and commitments* that foster trust, dialogue, and access to remedy for workers, farmers, and communities.
- **Regular monitoring for ongoing effectiveness** enables continuous learning and improvement, and for GMs to be embedded into an organisation.

Executive summary

Effective grievance mechanisms are a core part of a company's responsibility to respect human rights under the UN Guiding Principles on Business and Human Rights (UNGPs). They are an integral part of good human rights due diligence, which requires companies to proactively identify, prevent, and address harm. When embedded in a holistic approach that includes robust risk assessment, meaningful rightsholder engagement, and strong support for freedom of association (FoA), grievance mechanisms can significantly strengthen accountability and overall human rights performance.

AIM-Progress, the Ethical Trading Initiative (ETI) and Oxfam Business Advisory Service (OBAS), have gained deep, practical insights into what makes grievance mechanisms (GMs) work in real-world settings. Through individual and collaborative projects, this work involved direct engagement with global brands, supply chain partners, civil society organisations, and trade unions. This paper distils the shared learnings of the three organisations, providing practical guidance for companies to bridge the gap between their current practices and established standards of good practice. The analysis underscores the transformative potential of well-designed grievance mechanisms across diverse contexts. Taken together, this collective experience shows that the most effective grievance mechanisms are those that move beyond regulatory or human rights compliance to become practical, accessible, and genuinely responsive to workers' needs.

Well-designed mechanisms do more than resolve individual complaints: they provide safe access to remedy, build trust, and help identify systemic issues, contributing to more resilient and rights-respecting supply chains. However, over-relying on grievance mechanisms risks shifting responsibility onto rightsholders, especially workers who may face power imbalances or fear retaliation. For this reason, grievance mechanisms must complement – not substitute – proactive HRDD and must operate within collective structures such as trade unions and social dialogue processes.

Despite legal expectations set by frameworks like the EU Corporate Sustainability Due Diligence Directive (CSDDD), the German Supply Chain Act, and France's Duty of Vigilance Law, many company mechanisms remain underused or ineffective, often because they are designed in isolation, lack trust, or overlook cultural and contextual realities. Experience across regions shows that a mechanism's effectiveness depends as much on *how* it is created as on its technical features. Genuinely engaging workers and other rightsholders helps ensure mechanisms reflect local realities, address power dynamics, and build confidence to raise concerns.

Emerging evidence from the initiatives referenced in this paper demonstrate that trusted, participatory processes can deepen dialogue between workers and employers, strengthen collective worker agency, and contribute to both remedy and prevention. Ultimately, grievance mechanisms grounded in transparency, accountability, and meaningful rightsholder engagement can become powerful components of HRDD and enable safer, more supportive workplace environments.

A worker-led approach to grievance mechanisms

Building on the insights of this combined experience, the paper introduces a **worker-led approach to grievance mechanisms**, one that centres the people most directly affected by workplace risks and harms. Rather than relying on top-down or purely tool-driven models, this approach emphasises meaningful worker participation from the outset. This helps ensure that mechanisms reflect local realities, address power imbalances, and align more closely with the expectations of the UN Guiding Principles on Business and Human Rights.

A worker-led approach to grievance mechanisms centres on active worker participation, comprehensive design tailored to specific contexts and sustained organisational support. By building trust, ensuring accessibility, and maintaining transparency, companies can foster a culture of open dialogue, accountability, and continuous improvement. This approach not only resolves workplace grievances but also enhances collaboration, worker engagement, and overall workplace environment.

Key components of a worker-led approach to grievance mechanisms:

Brand engagement and supplier support

- Commitment
- Access to resources



Meaningful stakeholder engagement

- Engage and partner



Mindset shift and redefinition of grievance mechanisms

- Redefine understanding of grievances
- Foster a positive feedback culture



Active worker engagement and participation

- Co-design and collaboration
- Empowered grievance officers
- Embedding in workplace culture



Comprehensive and tailored design

- Context-specific adaptation
- Worker-centric design
- Apply a gender lens



Building trust in the grievance mechanism

- Safe and accessible reporting
- Transparency and dialogue
- Worker participation and empowerment
- Capacity building for workers and managers



Continuous improvement and cultural integration

- Long-term organisational commitment
- Leadership commitment
- Monitoring and evaluation



Overview of projects' activities and results

The initiatives examined in this paper supported first-tier suppliers to global brands in establishing more effective, rights-compatible grievance mechanisms for workers in supply chain settings. Although most suppliers already had grievance channels, these were rarely used due to low trust, fear of retaliation, limited clarity, and barriers faced by women, migrant workers, and other marginalised groups.

Using the Grievance Mechanism Toolkit, the support focused on **process over prescription**, helping suppliers co-develop mechanisms with workers through structured planning, gap analyses, and the creation of worker–management taskforces. Capacity-building targeted workers, supervisors, HR teams, and brand representatives, supported by surveys and awareness-raising to ensure mechanisms were accessible, transparent, and understood.

Suppliers strengthened their systems by expanding reporting channels, clarifying procedures, and embedding gender-sensitive and confidentiality safeguards. Governance improved through increased worker participation, including trade union involvement where present, or elected worker representatives where unions were absent. This helped build shared ownership and greater legitimacy.

Early outcomes showed increased worker awareness, clearer processes, and growing confidence in using the mechanisms, leading to the first cases being raised. Management also made progress, actively recognising the value of worker involvement and fundamentally shifting their perspective on grievance mechanisms. While still in the early stages, the initiatives have established a strong foundation for grievance systems that are more inclusive, trusted, and aligned with the UNGPs, and better positioned to contribute to long-term accountability and continuous improvement.

At a glance: AIM-Progress/ETI/OBAS work on grievance mechanisms

9 projects delivered



14 global brands engaged directly



20 additional brands and retailers reached indirectly



29 suppliers supported with hands-on advice



202 suppliers upskilled through training

186 individuals joined awareness webinars

Multiple
CSOs and trade unions engaged

Getting started: actions companies can take

To implement effective, rights-respecting grievance mechanisms, companies must shift from delivering fixed solutions to adopting a **rightsholder-centred, worker-led approach** grounded in meaningful **engagement, social dialogue, and shared ownership**. A credible grievance system requires companies to **support freedom of association (FoA)** and work constructively with **trade unions and worker representatives**. Grievance mechanisms should complement – not replace or undermine – existing union processes, strengthening workers' collective agency and improving communication between workers and management.

Key actions companies can take include:

1 Tailor support to local realities

- Provide tools and resources adapted to each supplier's context.
- Ensure accessibility for all workers, including women and migrant workers.
- Address language, literacy, and cultural barriers with input from worker representatives.

2 Deepen engagement and social dialogue

- Actively involve workers, unions, and representatives in the design, operation, and review of grievance mechanisms.
- Promote FoA and ensure unions play a central role where they exist; where they do not, support workers to organise freely.
- Foster regular, transparent communication between management and workers to build trust.

3 Build sustainable, long-term systems

- Conduct ongoing monitoring with worker and union participation.
- Provide continuous support, technical advice, and capacity building to suppliers.
- Encourage sector-wide collaboration that centres worker representation and collective voice.

By adopting this approach, companies can establish effective grievance mechanisms that strengthen worker agency, improve workplace conditions, and reinforce long-term, rights-respecting supply chain relationships.

1. Introduction

When people hear the term "grievance mechanism," their immediate instinct is often to think of a solution: *"We have a hotline"* or *"Use an app."* Over the last four years, through trainings, webinars, consultations, and one-to-one sessions with companies and organisations across five continents, we have observed this recurring pattern. When asked, "What does 'grievance mechanism' mean to you?" the responses tend to focus on tools – hotlines, apps, complaints boxes.

But a grievance mechanism is so much more than a tool. It is a process, a system, and ultimately, a commitment: a way for workers, farmers, and communities to voice their concerns and seek remedies in a safe, trusted, and effective manner. Unfortunately, many organisations associate grievance mechanisms with negativity or problems to be avoided. Phrases like "we don't have any grievances," "negative," or "problematic" surface frequently in discussions, revealing a mindset that can hinder meaningful engagement.

Across multiple initiatives implemented by AIM-Progress, the Ethical Trading Initiative (ETI), and Oxfam Business Advisory Service (OBAS) over the past four years in diverse industries and geographies, one insight is consistent: effective grievance mechanisms must prioritise dialogue, inclusivity, accessibility, and trust. GMs are not stand-alone channels; they are embedded in relationships, power dynamics, and workplace systems.

At the same time, grievance mechanisms are a core element of a company's responsibility to respect human rights. As set out in the UN Guiding Principles on Business and Human Rights (UNGPs), companies must prevent and address adverse impacts and ensure that rightsholders have access to remedy. GMs support – but do not replace – broader human rights due diligence (HRDD): the responsibility for understanding, anticipating, and responding to human rights risks rests with businesses and their supply chains. When embedded in a holistic approach that includes robust risk assessment, meaningful worker engagement, and strong support for freedom of association (FoA), grievance mechanisms can significantly enhance a company's overall accountability and effectiveness.

However, over-emphasising GMs as the primary way to identify harm risks shifting responsibility onto rightsholders – especially workers facing precarity, power imbalances, or fear of reprisal. Mechanisms that rely solely on individuals coming forward can overlook systemic risks or exclude those who feel unsafe speaking up. For this reason, grievance mechanisms must complement – not substitute – proactive HRDD and must operate alongside collective processes that empower workers.

Fundamentally, the effectiveness of grievance mechanisms is shaped not only by their technical design but by the *quality of worker–employer dialogue*. Embedding GMs within strong worker representation and social dialogue is widely recognised as the gold standard. **Social dialogue** – central to international labour standards – encompasses all forms of negotiation, consultation, and information exchange between employers, workers, and, where relevant, governments. In supply chain contexts, **bipartite social dialogue** involves structured collaboration between workers (through trade unions or representative bodies) and employers to raise concerns, resolve issues, and strengthen systems such as grievance mechanisms. When workers can engage collectively, safely, and on equal footing, mechanisms become more trusted, more accessible, and more likely to address both individual and systemic issues.

Ideally, a GM enables rightsholders – particularly workers, communities, and groups at heightened risk of harm – to raise concerns without fear of retaliation and to receive timely, fair, and rights-compatible outcomes. The UNGPs and legal frameworks – including the EU Corporate Sustainability Due Diligence Directive (CSDDD), the German Supply Chain Act, and France's Duty of Vigilance Law – reinforce that grievance mechanisms must be accessible, legitimate, equitable, predictable, transparent, rights-compatible, and a source of learning. Yet in practice, many companies still fall short. Too often, GMs are treated as compliance tools – internally designed, poorly communicated, culturally disconnected, or overly reliant on technical "solutions" like hotlines or apps. Without trust, protection from retaliation, and meaningful participation, such mechanisms remain unused and ineffective.

Drawing on years of initiatives led by members of AIM-Progress, the Ethical Trading Initiative (ETI), and Oxfam Business Advisory Service, this paper demonstrates that the effectiveness of a grievance mechanism is shaped as much by how it is established as by its technical design. By examining real-world experiences, the paper suggests moving beyond viewing GMs as mere compliance tools and demonstrates the key steps for actively engaging workers in the process. Mechanisms must be grounded in genuine engagement with workers and affected rightsholders, reflecting local realities, addressing power imbalances, and building the trust needed for sustained use. Although many initiatives highlighted here are still in early stages, they already show promising signs: more constructive dialogue between workers and employers, greater confidence to raise concerns, and growing evidence that trusted processes contribute to both remedy and prevention.



The paper is organised around three core objectives that unfold over the following sections:

- **Introducing a worker-led approach:** Leveraging the combined experience of OBAS, AIM-Progress, and ETI, this paper first explores the essential characteristics of successful GMs (Section 2), before detailing a worker-led approach that emphasises meaningful stakeholder engagement (workers, farmers, communities and other impacted stakeholders and their representatives) (Section 3).
- **Showcasing a tested toolkit:** The experience highlights how supplier sites have successfully used the Grievance Mechanism Toolkit developed by OBAS for Reckitt to design and improve their grievance mechanisms, leading to gains in trust and problem-solving (Section 4). Concrete examples from the initiatives demonstrate how to involve rightsholders not only as users but as active designers and implementers of these systems, and the challenges that were overcome in the process. An appendix offers a detailed summary of the referenced initiatives.
- **Outlining a path forward:** To promote wider adoption across supply chains, the paper suggests practical steps companies can take to scale these efforts and implement a more consistent, robust, and sustainable model for addressing worker concerns (Section 5).

Introducing the organisations

AIMprogress

AIM-Progress is a global initiative of fast-moving consumer goods manufacturers, retailers and suppliers, joining forces to drive positive change in their supply chains. Its mission is to positively impact people's lives and ensure respect for human rights while delivering value to members and their supply chains. The organisation works through dedicated working groups, which unite member companies to address key responsible sourcing challenges – including the development and implementation of effective grievance mechanisms.

Ethical Trading Initiative

The Ethical Trading Initiative (ETI) is a leading alliance of trade unions, NGOs and businesses, working together to advance human rights in global supply chains through collective action, advocacy and accountability. ETI supports companies to carry out meaningful human rights due diligence, identifying, preventing and responding to risks to workers, including by improving workers' access to effective grievance mechanisms and remedy.

Oxfam Business Advisory Service

From 2019-2025 Oxfam Business Advisory Service helped businesses to improve their impact in global supply chains by providing practical guidance and advice on human rights issues. Building on decades of Oxfam's research and advocacy, OBAS put recommendations into practice, working constructively to build trust with businesses and tackle challenges together in a pragmatic way.



1.1 Overview of the grievance mechanism initiatives implemented

The paper draws insights from several initiatives that, in different ways, involved the use of the grievance mechanism Toolkit and its guiding principles. Developed by Oxfam Business Advisory Service for company Reckitt and later made publicly available, the toolkit aims to help businesses establish and strengthen their own grievance mechanisms. It provides an overview of key criteria for designing effective grievance mechanisms, examples of good practices and a step-by-step guide for planning and implementing operational-level grievance mechanisms in the workplace.

The toolkit was developed in 2021, building on existing work and practical experience from companies, trade unions and NGOs. It also draws on interviews with human rights practitioners and experts. The toolkit was designed to support companies (especially first tier companies operating in global supply chains) in developing or improving operational level grievance mechanisms. Rather than offering a one-size-fits-all model, the toolkit focuses on the process of designing a grievance mechanism and provides guidance that can be tailored to local contexts. As such, the guidance and principles outlined in the toolkit can apply to different levels of grievance mechanisms and to companies operating in different tiers. Guidance is articulated as step-by-step support and for different levels of progress:

Beginner

Introduces foundational steps for setting up a grievance mechanism that can be expanded over time.

Established

Provides further guidance to help strengthen systems for receiving and handling grievances.

Advanced

Suggests additional measures to embed robust, rights-aligned grievance mechanisms into business operations.

Since its launch in 2021, the toolkit has been applied in multiple sectors and regions, primarily tier-1 suppliers. The learnings presented in this paper are drawn from this experience, which included technical support from Oxfam Business Advisory Service and partnership with AIM-Progress and the ETI. What follows is an overview of the initiatives implemented by the three organisations and central to this paper. More detailed descriptions, including key activities and results, are provided in the Appendix.

AIM-Progress led initiatives

- A roll out of the implementation of the site-level Grievance Mechanism Toolkit developed by Oxfam Business Advisory Service for Reckitt (an AIM-Progress member). The project aimed to support a group of suppliers in strengthening their grievance mechanisms so that workers could safely, confidently, and transparently raise issues and concerns with their employers. The project began in early 2023 and supported 19 tier-one suppliers of three AIM-Progress members in improving their site-level grievance mechanisms. For more details see here for a summary.
- A "scale up" for implementation of the Grievance Mechanism Toolkit. Building on the previous roll out project, this phase expanded the implementation of the Grievance Mechanism Toolkit to a larger group of AIM-Progress members and their suppliers and initiated consultations to improve the accessibility and user-friendliness of the Grievance Mechanism Toolkit. It also focused on strengthening the capacity of brands and suppliers to implement the toolkit's guidance independently, without dedicated external support.
- A project focused on strengthening grievance mechanisms in Brazil's sugarcane supply chain. This ongoing work assesses existing systems addressing workers' rights issues and supports improvements to make them more accessible, user-friendly, and responsive to the needs of marginalised and vulnerable workers.

  Oxfam Business Advisory Service provided technical support and advice across all three initiatives.

Ethical Trading Initiative led initiatives

- A two-year project to improve access to grievance mechanisms for vulnerable workers in selected agricultural supply chains, which included piloting grievance mechanisms at grower level (planned in Spain and Italy, and implemented at two grower sites in Spain) to facilitate workplace dialogue between workers and employers, improving access to fair complaint processes; and building a civil society network in Côte d'Ivoire, Tunisia, and Morocco to raise awareness of labour rights and the risks of exploitation.

  Oxfam Business Advisory Service led primary research in Italy and Spain and provided technical advice in the design and implementation of the pilot in Spain.

Oxfam Business Advisory Service initiatives

- Developed and piloted a Grievance Mechanism Toolkit with Reckitt (a member of the AIM-Progress grievance mechanism working group). The toolkit, now publicly available, details practical steps for companies to take in designing and implementing effective operational (site-level) grievance mechanisms, with a focus on tier one manufacturing suppliers.
- Worked with a supplier company within the agricultural supply chain of UK food retailer Waitrose to support them with establishing an effective operational grievance mechanism.
- Worked with a joint supplier to two global FMCG companies to implement the guidance of the Grievance Mechanism Toolkit.
- Provided ongoing advice to a FMCG company and their first-tier suppliers to implement guidance of the Grievance Mechanism Toolkit.
- Published, presented and delivered training on grievance mechanisms to a wide range of actors including FNET, AIM-Progress, ETI members and civil society organisations in Spain and Indonesia.

2. What are grievance mechanisms?

A grievance mechanism is a formal or informal complaint process that allows individuals or groups to raise concerns, grievances and report abuse/violations within an organisation related to potential or actual adverse impacts on human rights and the environment.

A grievance mechanism is:

- A **process** that can be used by individuals, workers, communities and/or civil society organisations that are **being negatively affected** by certain business activities and operations.
- A **tool to ensure respect for human rights** required by the **UNGPs**.
- Not a substitute for freedom of association

These mechanisms are designed to enable workers and communities to raise concerns about their rights and working conditions. They are also necessary for businesses as they provide a structured and transparent way to proactively identify, address and resolve issues that affect workers, communities, and suppliers. However, while grievance mechanisms can strengthen communication for individual grievances, they are not a substitute for – and must not impede – workers' rights to freedom of association, collective bargaining, and representation by genuinely independent and democratically elected unions. Overall, these mechanisms can be an important tool for fostering trust, addressing grievances early, and maintaining positive workplace relationships.

Grievance mechanisms and trade unions

Grievance mechanisms should be firmly grounded in workers' freedom of association (FoA) and the central role of trade unions. Under international labour standards, including ILO Conventions 87 and 98, trade unions and collective bargaining are the primary grievance and remedy mechanism, providing both preventive and corrective functions. Workplace grievance processes should reinforce – not duplicate – collective bargaining structures. This means ensuring clarity on how workplace issues are channelled through union processes, making workers aware that they can seek union support at every stage, and avoiding the creation of systems that could inadvertently bypass or weaken organised worker voice.

Where union structures are new, emerging, not yet fully effective in practice, or do not exist, workplace grievance mechanisms can help ensure that workers still have safe and predictable ways to raise concerns. These mechanisms should be co-designed and periodically reviewed with worker representatives, including trade unions, to maintain legitimacy, trust and protection against retaliation. When embedded within a broader ecosystem of worker voice, grievance mechanisms strengthen both individual and collective pathways for addressing concerns – while keeping collective bargaining at the centre of workplace dispute resolution.

Grievance mechanisms and trade unions: key alignment principles

A grievance mechanism should:

- **Complement, not replace**, trade union representation and collective bargaining
- **Clearly uphold FoA**, including the right for workers to join and be represented by a union in any grievance process
- **Be co-designed with workers and unions** to ensure legitimacy and trust
- **Ensure protection against retaliation** for anyone who raises a concern
- **Use joint oversight structures** (worker–management committees) to monitor how grievances are handled and resolved
- **Support both individual and collective concerns**, recognising that not all issues are the same

Effectiveness criteria

While grievance mechanisms must be tailored to their specific context, as no universal design suits all situations, certain key characteristics are essential for effectiveness. The UN Guiding Principles on Business and Human Rights (UNGPs) set out eight effectiveness criteria that serve as a foundation for designing and implementing GMs that are trusted, accessible, and capable of delivering fair outcomes. These criteria provide essential guidance to create mechanisms that not only comply with human rights standards but also foster trust and engagement among workers and affected communities.

1. **Legitimacy:** Processes must be transparent, equitable, and trusted by all stakeholders. Trust is built through consistent application and accountability.
2. **Accessibility:** GMs must be easy to use, with minimal bureaucracy, and supported by training to ensure that all workers – especially marginalised groups like women – can access them.
3. **Predictability:** Clearly defined procedures and timelines are essential for building confidence in the system.
4. **Equitability:** Both workers and management must have access to information, advice, and support, ensuring a fair grievance resolution process.
5. **Transparency:** Regular updates on grievance status and outcomes ensure that workers feel heard and respected.
6. **Rights-compatible:** Grievance processes must align with international human rights standards and national laws, protecting workers from retaliation.
7. **Learning-oriented:** GMs should include mechanisms for monitoring, review, and learning to ensure continuous improvement.
8. **Engagement-focused:** GMs must be designed and implemented in collaboration with intended users to ensure relevance and effectiveness.



Regulatory environment

The push for robust grievance mechanisms has become more urgent as companies face increasing regulatory requirements, alongside rising expectations for human rights and sustainability due diligence. The UNGPs set a global standard for meaningful engagement with rightsholders, highlighting the importance of GMs that can address concerns and enable access to remedy. Regulations such as the EU Corporate Sustainability Due Diligence Directive (CSDDD) reinforce this expectation by requiring companies to ensure that rightsholders – including workers, farmers, and communities – have safe and accessible channels to raise issues and seek remedies.

At the same time, the rapidly evolving regulatory landscape brings a clear risk. As companies move to comply at scale, grievance mechanisms may be introduced with a narrow, compliance-driven mindset. In these cases, grievance systems can become procedural checkboxes rather than tools rooted in trust, dialogue, and meaningful engagement. When implemented in this way, mechanisms may exist in form but not in function, leaving rightsholders without a genuine voice and companies without the insight needed to prevent harm or improve practices.

This underscores a broader shift that companies are increasingly being asked to make: moving from a focus on compliance to a focus on accountability and relationship-building. Effective grievance mechanisms are most impactful when they are understood not only as regulatory requirements, but as ongoing processes of listening and responding. Embedding this mindset requires commitment across the business, from senior leadership to operational teams, and a willingness to co-design mechanisms with the people they are meant to serve.

2.1 Why grievance mechanisms are needed

Committing to effective grievance mechanisms is not merely a compliance exercise; it is a strategic and ethical commitment that, when **designed and implemented in alignment with the UNGPs effectiveness criteria**, generates clear benefits for both workers and businesses.

However, the existence of a GM alone does not guarantee trust or effective outcomes. These benefits are only realised when mechanisms are well-designed and governed, backed by genuine company commitment, and grounded in trust, dialogue, and respect for the agency of rightsholders.

Where these enabling conditions are in place, GMs become an essential component of responsible business conduct. They provide a predictable, transparent, and safe avenue for raising concerns and resolving disputes, paving the way for distinct benefits for both workers and businesses.

Benefits for workers

When credible, accessible, and aligned with the UNGPs effectiveness criteria, grievance mechanisms empower workers and affected communities to safely voice concerns, seek timely and fair remedies, and participate meaningfully in problem-solving processes. This enhances their sense of safety and agency at work.



Well-functioning GMs provide workers with a recognised platform to assert their rights and help safeguard these rights and strengthen workers' sense of security, ownership, and engagement.



Secure and confidential reporting channels allow workers to raise grievances without fear of retaliation or discrimination, ensuring their concerns are acknowledged and addressed in a fair and transparent way.



When **predictable processes, monitoring, and follow up** are implemented, effective GMs can deliver time-bound, verifiable remedies. This not only resolves immediate concerns but also contributes to long-term improvements in working and living conditions, creating a healthier and more productive environment.

Benefits for businesses

When effectively designed and governed, GMs provide businesses with a strategic advantage in managing risks and fostering responsible operations.



Meaningful GMs enable companies to identify and address issues early, reducing the likelihood of disputes escalating into operational disruptions, legal liabilities, or reputational harm. When offering a structured, predictable process for dialogue, GMs help build trust, strengthen communication, and promote a more inclusive and stable workplace culture.



With **clear procedures** and, where feasible, **independent oversight**, GMs ensure substantiated grievances lead to timely remediation – both individual and systemic. With this, they contribute to a more resilient, responsive business environment.



Beyond individual cases, **well-governed mechanisms** help businesses uncover blind spots that traditional audits or monitoring may overlook, offering real-time insights into worker experiences and workplace conditions.



Robust GMs also demonstrate compliance with regulatory requirements and alignment with international standards, reinforcing a company's commitment to ethical conduct and accountability. In doing so, companies build consumer and stakeholder trust, and strengthen brand reputation.

2.2 Levels of grievance mechanisms

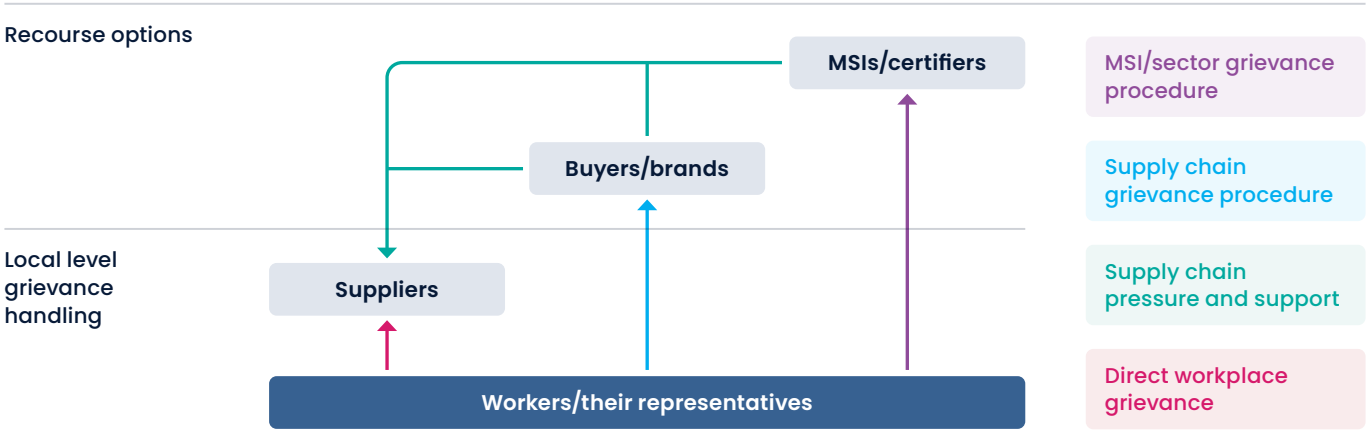
Grievance mechanisms provide a vital platform for resolving issues arising from business activities. By addressing underlying concerns, facilitating dialogue, and fostering solutions that benefit all involved stakeholders, GMs prioritise problem-solving. Their effectiveness depends on simplicity and efficiency – the more straightforward and timely the process, the more successful it is in achieving its objectives. This is why the UNGPs emphasise the importance of operational or site-level GMs, which are closest to the people and situations they are intended to address.

Building on this proximity, site-level GMs can create a safe and supportive environment for workers and communities, provided they are designed with meaningful participation from those affected. While proximity alone cannot rebalance entrenched power dynamics, mechanisms that are co-created with workers and their representatives, and underpinned by respect for freedom of association and collective dialogue, can begin to shift workplace relations towards greater trust and accountability. In these contexts, site-level GMs can offer easy access and timely interventions, encouraging dialogue and empowering individuals to raise issues without fear.

When site-level GMs are ineffective or unavailable, higher-level grievance mechanisms provide recourse, ensuring that remedies remain accessible and grievances are addressed. This creates a broader ecosystem of mechanisms, each reinforcing the other to create a cohesive system for addressing grievances and providing remedy. In this ecosystem:

- **Site-level GMs** are expected to resolve the majority of issues close to their source, ensuring swift and direct responses.
- **Supply chain GMs** extend this capacity across borders, often managed by buyers, to address challenges within complex global supply chains.
- **Industry-wide or multi-stakeholder GMs** address systemic issues across an entire sector or multiple sectors through channels jointly governed by businesses, civil society, trade unions and governments, while being managed by a third-party provider – thus going beyond the control of any single company.

Levels of grievance mechanisms



Source: Grievance mechanism toolkit (Reckitt/OBAS) adapted from ETI (2019).

Regardless of their level of operation, all GMs must align with the eight effectiveness criteria set out by the UNGPs to ensure they provide meaningful remedy to rightsholders.

2.3 Common challenges in implementation

Despite the strong emphasis on grievance mechanisms across international frameworks, significant implementation challenges remain. Entrenched mistrust, limited awareness, and persistent power imbalances between management and workers can undermine a mechanism's ability to effectively address workers' concerns and, from a company perspective, weaken efforts to detect risks early and demonstrate credible due diligence in practice. Many of these challenges, also reflected in the initiatives examined in this paper, include:

- **Lack of trust:** Workers may fear retaliation or view the mechanism as biased or unreliable. The absence of meaningful engagement with worker representatives, trade unions, and civil society organisations in the design and promotion of the mechanism undermines awareness and trust.
- **Misinterpreted metrics:** A low volume of complaints is often mistaken for success, when it may actually indicate barriers to access.
- **Inaccessibility:** Even where a GM formally exists, it may fail to reach or serve all workers if the channels used do not align with workers' needs, contexts, or communication preferences. In many cases, subcontracted or agency workers fall outside the mechanism's scope, leaving significant segments of the workforce without access to remedy.
- **Complexity:** Overly bureaucratic processes can discourage usage, particularly among underrepresented groups.
- **Management disengagement:** Inconsistent follow-through from management undermines the credibility of the mechanism.
- **Bias:** Mechanisms seen as serving company interests rather than workers' needs can erode trust and effectiveness.
- **Complicated processes:** Setting up a GM can be complex, requiring substantial support and guidance for supplier companies.
- **Lack of accessible support:** Companies often need straightforward, easily accessible resources and assistance to effectively implement and operate GMs.

The initiatives discussed in this paper have directly addressed these challenges by adopting an approach centred on effective engagement with rightsholders (in this case, workers) to design and implement grievance mechanisms. This approach prioritises trust, inclusivity, and transparency, ensuring that the resulting mechanisms are both effective and sustainable.

3. Insights and learnings: Rightsholders and effective grievance mechanisms

This section distils insights and collective learnings of AIM-Progress, ETI, and Oxfam Business Advisory Service (OBAS). It highlights the barriers workers face in accessing grievance mechanisms (GMs), outlines worker-centred implementation processes and their core elements, and summarises emerging results and outcomes.

Across the initiatives, most suppliers technically had grievance mechanisms in place – such as suggestion boxes, direct communication with supervisors, and an open-door policy with HR. Yet these systems were receiving almost no grievances. Suppliers and brands initially interpreted this silence as an absence of problems. However, deeper engagement with workers revealed that grievances did exist – they simply were not being raised, and therefore were not being resolved.

A common theme across all initiatives is that, regardless of the specific GM design, effectiveness depends on **involving workers (and other potential users, such as communities) in both the design and implementation of the mechanism**. This is essential to prevent the shortcomings identified in the previous section and to build genuine trust and usability.

While each initiative had slightly different objectives, they all aimed toward the same overarching outcome: grievance mechanisms that workers trust, use, and through which grievances are addressed. In most cases, achieving this is a longer-term endeavour that extends beyond the project timeline (though Section 4 provides examples where this has already occurred). During the project cycle, expected outcomes included: a shift in management mindset toward viewing GMs as tools for dialogue; processes that actively include workers; increased worker capacity to participate; improved access through reduced barriers; and a more constructive workplace environment. Across the initiatives, we observed notable progress in all these areas.

A detailed summary of the project activities and results are provided in the Appendix.

3.1 Barriers identified

The initiatives uncovered multiple barriers preventing workers from accessing grievance mechanisms, underscoring the need for inclusive worker participation (i.e. there needs to be worker engagement that well reflects the workforce composition) in designing and implementing these systems.

Most pre-existing 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:** 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 like smartphones or apps. In some cases, the absence of anonymous complaint options further deterred engagement.
- **Fear of retaliation:** Workers feared retribution for speaking out, undermining the effectiveness of grievance channels.
- **Low worker awareness of rights and grievance mechanisms:** A significant portion of workers showed limited understanding of their rights at work and often did not recognise when those rights were being violated or that they had grounds for complaint. At the same time, information about grievance mechanisms was **poorly communicated, inaccessible, or not reinforced**, leaving many – particularly subcontracted or temporary workers – unclear about how to use the mechanism, what issues it covered, and what protections were in place.
- **Low trust:** The **centralised and opaque nature** of many company mechanisms can make them seem remote or biased towards management. Limited communication, weak worker engagement, and cultures that discourage speaking up or fail to prevent retaliation further erode trust, leading workers to view formal mechanisms as unsafe or ineffective.
- **Little visibility of successful resolution:** When workers rarely hear about cases being addressed – or see no tangible outcomes from issues raised – it reinforces the perception that using the mechanism will not lead to change. This lack of feedback loops and transparent reporting **erodes confidence in the process**, discouraging workers from coming forward and weakening the overall credibility and preventive value of the GM.

A major conclusion across the initiatives is that the failure to involve workers and their representatives in the design and implementation of grievance mechanisms is at the root of the barriers identified, and addressing this gap is essential for creating systems that are both effective and trusted. A recent report from the World Benchmarking Alliance confirms the widespread nature of this gap in company practices: 91% of companies assessed provide grievance mechanisms for workers and 76% include external stakeholders, but only 10% involve rightsholders in designing these systems, and just 5% ensure trust through predictability and transparency *(World Benchmarking Alliance, 2024)*.

3.2 Steps to close the gap in workers' participation

Across all initiatives, the central aim was to strengthen worker participation in grievance mechanisms (GMs) by prioritising the **process** over the adoption of any single tool or structure. The projects focused on building worker-led systems that were inclusive, trusted, and responsive – especially for women, migrant workers, and others facing heightened barriers to participation. Strengthening representation and embedding grievance processes within existing or emerging social dialogue structures became the starting point for all sites, particularly given that worker participation had been weak or absent.

To support this shift, companies received practical guidance and structured assistance. This included gap analysis to identify areas for improvement, targeted capacity-building for worker representatives and HR personnel, and accessible awareness materials for the wider workforce. Guidance covered core design features of effective GMs – such as multiple entry points, transparent reporting processes, and independent oversight – to build trust and encourage use. Ongoing advisory support helped companies incorporate gender-sensitive approaches, adopt best practices in issue resolution, and develop monitoring systems to track use and outcomes over time.

Best practice shows that workers should engage with grievance mechanisms through credible and diverse representation – ideally through trade unions or, where unions are absent, democratically elected worker committees that reflect the diversity of the workforce (e.g., gender, roles, contract types). Robust collective bargaining arrangements and active trade union involvement strengthen GMs by ensuring workers have a formal, protected voice and by fostering early dialogue and problem-solving before issues escalate.

Building on this, GMs should be embedded within **broader systems of social dialogue** at the workplace level, rather than operating as stand-alone processes. Integrating operational grievance mechanisms with existing structures – such as trade unions, joint worker–management committees, or regular consultation forums – is a sign of a mature industrial relations system. It also supports continuous engagement, shared ownership, and a culture of ongoing improvement. Where formal representation structures were weak or absent, meaningful engagement can still be achievable, as illustrated later.

As previously mentioned, worker participation had been limited in all the companies involved in the projects, making it essential to strengthen representation and embed grievance processes within existing or emerging structures of social dialogue. Improving worker engagement in the design and implementation of the grievance mechanism therefore became the starting point for all initiatives.

The Grievance Mechanism Toolkit offered a practical entry point, helping companies either integrate GMs into existing platforms or, alternatively, lay the groundwork for representative worker structures. In both cases, a phased approach was recommended to reinforce social dialogue around grievance handling, including: establishing a Grievance Mechanism Taskforce, appointing a grievance officer, and forming a grievance committee to ensure regular, representative participation.

The case studies that follow illustrate how these steps played out in practice, highlighting both the challenges encountered and the benefits achieved.

Setting up a GM taskforce – participation in design

The companies involved in the initiatives were requested to set up a **"grievance mechanism (GM) taskforce"** that included representatives from management and workers, to work together on the design (or review) of the GM policy. An important function of this taskforce was to be actively involved in the review and design of the new GM policy, and throughout the process to seek feedback and input from wider sections of management and workers. This was the first step for the company management to sit down together with their workers and listen to their views and needs.

Management often had assumptions about what workers wanted and through these conversations they soon learned that the reality was quite different from what they thought. This was also particularly useful in helping companies to begin to explore and discuss gender sensitive grievances with workers.

In Factory X, where no trade unions existed, both management and workers hesitated at first. Senior management were unclear about the review process and concerned that it might create more problems, particularly since they had previously faced challenges when introducing new systems. However, once they started hearing directly from workers about their needs and barriers, saw how workers welcomed the opportunity to participate and understood the cost-effectiveness of some of the possible solutions to adopt, this hesitation faded. The management realised the value of this process and decided to use it for other new policies, as illustrated by the following quotes:

> ***[This guidance] gave us an approach to all the things in a very, very professional way.***
>
> **– Company X Owner**

> ***I like this system because everybody is involved in it and makes it transparent.***
>
> **– Company X CEO**

Workers in this factory were also initially hesitant to join the taskforce, mainly due to uncertainty about the project's scope and a general fear of change. This was addressed through enhanced internal awareness and training, enabling workers to understand the process and recognise its importance. After just a few meetings – and over a period of three months – workers became keen to participate in the review. This ultimately led to the development of a new grievance mechanism policy.

> ***Resistance was there. People [workers] didn't want to be on taskforce as didn't understand the project. […] So, time needed to help workers understand what the project was […] Workers were initially very cautious but changed attitude and started to come forward to be members of the GM committee.***
>
> ***[Worker] Participation before was difficult because there was no structure. Now there is a structure, and it is easier.***
>
> **– Worker representative at Company X**

In contexts where there were functioning trade unions, these structures took a leading role in the driving process. For example, at an agricultural site in Spain, representatives from the site's trade union were part of a taskforce that led the review of the existing grievance mechanism. This ensured that the resulting changes complemented and strengthened the union's role.

Appointing grievance officers – ongoing representation

This role, which increases workers' direct involvement in the grievance mechanism, plays a critical part in ensuring its effectiveness. This step was particularly challenging in contexts where workers had limited experience with collective organising or constructive dialogue with management.

Two key barriers had to be overcome:

- **Capacity building:** Company management often felt workers lacked the necessary skills for this role, assuming it should be filled by a HR representative. However, with adequate training and support, workers can develop the necessary skills. Several companies began this process, with two already appointing production workers as grievance officers.

- **Time allowance:** To perform the grievance officer role effectively, workers require dedicated, paid time within their normal working hours. This means that grievance officer responsibilities must not be added on top of existing workloads and that time spent on grievance-related duties would be fully compensated and would not affect their pay or performance expectations. In several projects, management initially expressed concern that releasing workers for these duties would either disrupt production or place an additional burden on workers who might still be expected to complete all regular tasks. Practical assessment showed that the actual time required for these tasks was modest and manageable. With slight adjustments to work schedules and clear communication, companies were able to integrate the role without disruption. As dialogue continued through taskforce meetings, management understanding and commitment strengthened, supported by evidence that the benefits of having trained workers in these roles – such as improved communication, earlier identification of issues, and smoother resolution processes – far outweighed the operational costs. Companies also monitored the time commitment closely to ensure that adjustments could be made where necessary and to maintain confidence among both workers and supervisors.

In Company Y with a labour union on site, the GM taskforce decided 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:

> ***Before, there was no visibility about the [GM] procedure and no clarity about the role of the union in it. But now everything is clarified on paper.***
>
> **– Union Secretary**

Other companies had different models of appointing grievance officers as appropriate to their situations. In one, workers elected two officers, one male, one female, to represent different types of employment (permanent and temporary). Another Grievance Mechanism Taskforce (made up of both workers and management) collectively tasked the human rights department with the role as it was seen as a neutral party. However, they also appointed worker "focal points" to help raise awareness about the GM and encourage greater worker participation.

Establishing a grievance committee – participation in implementation

A grievance committee can play an ongoing role in implementing the GM (while the GM taskforce typically operates during the design phase). In some cases, the GM taskforce evolved into the grievance committee. Worker participation in this committee means that grievances can be jointly discussed and helps to ensure an objective, transparent process.

Many participating companies took on this recommendation and used it as a first step to foster greater dialogue and collaboration.

The remit of the grievance committee varied in practice across companies. In some cases, the committee was directly involved in decision-making, acting as a joint decision-making body. In companies where there was a low level of trust among workers the committee reviewed decisions without disclosing the complainant's identity. This allowed workers to provide feedback on how grievances were handled while maintaining confidentiality. This was particularly important when reviewing gender-sensitive cases.

Grievance mechanisms as a tool for empowerment

Sustained engagement between users of grievance mechanisms – such as workers, community members, and farmers – and the company is central for fair remediation and continuous organisational learning. By involving rightsholders at every stage, GMs can reflect their needs, foster trust, and enable meaningful collaboration.

The following principles should be respected to enable meaningful worker participation:

- **Free and independent elections:** Worker representatives should be chosen through fair and independent elections.
- **Inclusivity:** Elected representatives must reflect the diversity of the workforce.
- **Independence:** Representatives must remain independent from management influence.
- **Protection:** Representatives must be safeguarded from retaliation, harassment, and threats of physical harm.
- **Upskilling:** Representatives must have access to the training, information, resources, time, and space needed to perform their roles effectively.

When these principles are followed, GMs amplify worker voices, cultivating transparency, mutual respect, and equitable grievance resolution – and **become a powerful tool for both remediation and empowerment**.

3.3 Results

Across the initiatives, suppliers achieved several important design-level improvements to their grievance mechanisms. Many expanded the number and type of reporting channels and broadened grievance policies to cover all worker groups, increasing accessibility and inclusivity. Governance structures were strengthened by enhancing worker participation – through trade unions where present or through elected workers serving as grievance officers or committee members where unions were absent. These changes helped establish shared ownership of the mechanism between workers and management, with several sites adopting joint worker–management oversight committees. While not fully independent, these structures represented a meaningful step toward reducing perceptions of company-controlled processes and improving the mechanism's credibility, though, as noted in Section 4.2, they cannot substitute for independent trade unions.

Although the initiatives were still at an early stage, there were clear signs of improvement in process quality and workplace dialogue. Suppliers reported increased worker awareness of the mechanism, clearer and more predictable procedures, and growing worker confidence in using the system. Some sites noted initial grievance submissions, signalling early trust and usability. These developments contributed to mechanisms that are more inclusive, transparent, and better aligned with the UNGPs.

Despite the short timeframe, the projects produced early, observable changes across three levels:

Immediate design-level improvements

- Clearer scope, structure, and governance of grievance mechanisms.
- Multiple reporting channels and greater accessibility.
- Strengthened worker representation in GM management.
- Establishment of tracking and monitoring systems.

Enhanced process quality, dialogue, and relationships

- **Greater worker engagement:** Workers showed increased confidence in raising concerns, leading to more grievances, ideas, and suggestions.
- **Broader input:** Worker feedback extended beyond workplace issues to include operational and efficiency-related suggestions.
- **Systematic monitoring:** New tracking systems introduced to identify emerging trends and address systemic challenges early.
- **Active worker involvement:** Workers participated directly in committees and feedback loops, supporting continuous improvement and sharing encouraging levels of satisfaction.
- **Improved workplace atmosphere:** Workers felt more valued, and managers observed a more open, supportive communication environment.
- **Strengthened trust:** Transparent, timely handling of grievances and sharing of aggregated outcomes reinforced credibility.

Early signs of longer-term impact

- It is still too early to generate robust quantitative metrics (e.g., grievance usage rates, resolution timelines, or links to operational performance).
- Initial indicators point to deeper, longer-term change beginning to take root.
- Management is shifting from viewing grievance mechanisms as compliance tools to recognising them as platforms for dialogue, accountability, and continuous improvement.
- Growing worker trust and participation suggest the foundations for more sustainable improvements in workplace relations and organisational culture.

4. A worker-led approach to grievance mechanisms

Across all the projects, several common elements emerged. Above all, actively engaging workers and involving them in the process, as outlined in the previous section, significantly improved the quality and trust in the grievance mechanism. The experiences also highlighted the importance of a comprehensive approach to unlock the full potential of these systems and overcome existing barriers and challenges.

The outcome is a worker-led approach that prioritises active worker participation, a tailored and context-specific design, and ongoing organisational support. This approach shifts the focus from mere compliance to collaboration, fostering trust, transparency, and continuous improvement within the workplace. The graphic below provides an overview of the key elements of the approach, which are explored in detail throughout this section.

Brand engagement and supplier support

- Commitment
- Access to resources

Meaningful stakeholder engagement

- Engage and partner

Mindset shift and redefinition of grievance mechanisms

- Redefine understanding of grievances
- Foster a positive feedback culture

Active worker engagement and participation

- Co-design and collaboration
- Empowered grievance officers
- Embedding in workplace culture

Comprehensive and tailored design

- Context-specific adaptation
- Worker-centric design
- Apply a gender lens

Building trust in the grievance mechanism

- Safe and accessible reporting
- Transparency and dialogue
- Worker participation and empowerment
- Capacity building for workers and managers

Continuous improvement and cultural integration

- Long-term organisational commitment
- Leadership commitment
- Monitoring and evaluation

4.1 Brand engagement and supplier support

Progress at supplier and grower sites depends heavily on **consistent engagement, leadership, and practical support from brands**. When buying companies set clear expectations, provide technical guidance, and allocate the resources needed to establish credible grievance mechanisms, suppliers are far better equipped to embed these systems sustainably. Additionally, when brands communicate that grievance mechanisms are tools for improvement – not instruments of compliance or penalty – suppliers feel more confident to engage openly and constructively.

Stronger relationships emerge when buyers invest in **hands-on capacity building**, maintain regular dialogue, and follow up on implementation challenges. Visible commitment from senior leadership reinforces the importance of grievance mechanisms and signals to factory management that worker voice is a central component of responsible sourcing. Local brand teams significantly enhance this process: their knowledge of legal frameworks, cultural norms, and workplace dynamics allows them to support suppliers in context-appropriate ways, monitor grievances, track outcomes, and ensure learning flows back to headquarters. Where brands lack an in-country presence, external local consultants can undertake these functions to maintain consistent oversight and support.

Key ingredients

- **Commitment**
  - Understand grievance mechanisms as tools for improvement rather than compliance.
- **Access to resources**
  - Provide suppliers with technical guidance, resources, and tools (e.g., the GM Toolkit).
  - Ensure continuous monitoring, follow up and adaptive learning to maintain long-term effectiveness.

How purchasing companies can support their suppliers

Purchasing companies have an important role in supporting suppliers. Beyond financial support, suppliers benefit from genuine collaboration and sustained commitment from their customers. Strengthening the skills and capacity of the teams responsible for procurement and sustainability within purchasing companies is essential for the effective, day-to-day implementation of grievance mechanisms. Additionally, flexible tools, such as the Grievance Mechanism Toolkit, provide valuable resources that can be adapted to suit different supplier contexts.

4.2 Meaningful stakeholder engagement (trade unions and civil society)

Effective grievance mechanisms rely not only on internal company efforts but also on **strong, trusted relationships with external stakeholders who bring representation, legitimacy, and local knowledge**. Trade unions and civil society organisations (CSOs) play distinct yet complementary roles in bridging gaps between companies and rightsholders. Their involvement enhanced the credibility, accessibility, and uptake of grievance mechanisms – particularly in contexts where workers may lack power, voice, or confidence to raise concerns directly.

Trade union engagement

Trade unions are essential partners in effective grievance mechanisms. Their involvement ensures that worker participation is grounded in democratic representation and linked to wider systems of collective bargaining and social dialogue. Where unions are present, they help workers understand their rights, provide representation during grievance handling, contribute to fair investigations, and support systemic resolution of issues through continuous dialogue with management.

Unions also strengthen the legitimacy and inclusiveness of grievance systems by representing diverse worker groups – such as women workers, agency workers, and those in precarious roles. However, in sectors or regions where freedom of association is restricted or unions are weak or absent, alternative structures (such as independent elected worker committees) may facilitate participation, though they cannot fully substitute for union roles within mature industrial relations systems.



Civil Society Organisation (CSO) engagement

CSOs play a complementary – and sometimes indispensable – role, particularly where unions are absent or unable to reach all rightsholders. CSOs help make grievance mechanisms more inclusive, trusted, and context-sensitive by:

- **Reaching groups that may not be represented by unions**, including migrant, seasonal, agency, young, and women workers.
- Engaging **rightsholders outside the workplace**, including smallholder farmers, local communities, women in home-based or community supply chains, and indigenous groups.
- **Raising awareness and supporting rights education**, enabling rightsholders to recognise violations and use grievance mechanisms safely.
- Offering **independent advice and accompaniment**, helping individuals navigate grievance processes.
- Acting as **neutral facilitators** during investigations and remediation, especially where trust in management-led processes is low.
- Bringing **local expertise** in language, culture, gender dynamics, migration patterns, and social norms.

Supporting access to remedy also means recognising and **strengthening existing CSO- or union-led grievance mechanisms**, rather than expecting CSOs to simply adapt to company-designed mechanisms. This may include:

- Reinforcing trade union grievance structures as primary channels.
- Partnering with community-based organisations that provide trusted reporting routes.
- Aligning company procedures with independent mechanisms already used by workers.
- Ensuring company-level processes complement – rather than replace – external rights-based avenues.

By working closely with rightsholders at community level, CSOs help create access points and trust that suppliers alone may struggle to build. However, meaningful CSO engagement requires deliberate effort from companies. Many businesses underestimate or overlook the strategic value of CSOs, engaging them only superficially or late in the process. Effective collaboration demands that companies recognise CSOs as independent, expert actors, involve them early in design and monitoring, and build long-term partnerships grounded in respect, shared purpose, and adequate resourcing.

Key ingredients

- **Engage and partner:**
  - Engage **trade unions** to anchor grievance mechanisms within broader social dialogue and collective bargaining structures.
  - Partner with **CSOs** to reach rightsholders who fall outside union representation and to provide trusted, localised expertise.
  - Work with organisations that understand the local context and ensure credibility and inclusiveness.
  - Strengthen existing **CSO-led (or union-led) grievance mechanisms** rather than expecting CSOs to adapt to company-designed mechanisms.



Leveraging local partnerships for effective grievance mechanism implementation

Given the shared objective of establishing effective grievance mechanisms (GMs) and the overlap in company membership, the ETI grievance mechanisms project partnered with the Spanish Ethical Trade Forum (SETF). This helped to enhance effectiveness, avoid duplication, build on existing trusted and longstanding stakeholder and supply chain relationships, and generate valuable insights for both organisations. This collaboration focused on selecting and supporting grower sites for a joint, worker-centric GM approach.

SETF's involvement was pivotal in the successful implementation of the project in Spain. Their established relationships and proven expertise in engaging suppliers within the agricultural supply chain were instrumental in securing supplier buy-in and building trust.

Onboarding growers presented challenges, particularly in identifying and engaging growers within ETI members' supply chains. Initial reluctance from growers was also a barrier; however, SETF's trusted local presence and long-standing relationships were crucial in overcoming these concerns. Subsequently, SETF became the key partner in supporting suppliers with the implementation of the advice and guidance provided by the project, helping to contextualise the approach to the local setting. This underscores the vital role of trusted local partners in bridging the gap between businesses and human rights perspectives, fostering engagement, and ensuring the effective adoption of grievance mechanisms.

Upskilling civil society organisations to strengthen local processes

Recognising the pivotal role that civil society organisations (CSOs) play in supporting grievance mechanisms, Oxfam Business Advisory Service collaborated with several CSOs in Spain (agriculture) and Indonesia (seafood) to enhance their understanding of grievance mechanisms as a vital business tool for providing remedy. Training sessions focused on key concepts linking grievance mechanisms, worker engagement, and social dialogue, emphasising the critical role that civil society organisations can play in supporting workers' participation in these processes and educating businesses about the effective use of these tools.

4.3 Mindset shift and redefinition of grievance mechanisms

To maximize the effectiveness of grievance mechanisms, companies must transition from viewing them as mere compliance tools to seeing them as proactive, ongoing instruments for fostering trust, dialogue, collaboration, and workplace improvement. This shift requires embracing transparency, viewing grievances as continuous improvement opportunities, and actively engaging workers throughout the process. By redefining grievances and fostering a positive feedback culture, companies can create a safe and inclusive environment where workers feel empowered to voice their concerns.

Key ingredients

- **Redefine grievance understanding:**
  - Ensure all stakeholders share a clear and inclusive understanding of what constitutes grievances, encouraging the reporting of all concerns, including minor issues.
  - Use inclusive language such as "concerns and suggestions" to make workers feel more comfortable raising issues.
  - Clarify the scope of grievances, particularly for marginalised groups who may benefit from a broader understanding of what qualifies as a grievance.
- **Foster a positive feedback culture:**
  - Create a site-level culture where feedback leads to tangible actions, reinforcing workers' trust and willingness to engage.
  - Involve workers in the governance of grievance mechanisms to empower them and enhance workplace collaboration.
  - Demonstrate genuine responsiveness to grievances, showing that worker input leads to meaningful change.

Moving away from the expression "grievance"

In nearly all sites, the term "grievance" presented significant challenges. For many managers, it implied an influx of complaints or accusations, which generated resistance to the process. For workers, the term often felt formal, legalistic, or intimidating, discouraging them from raising everyday problems or early warning signs. As a result, several companies explored alternative expressions – such as "suggestions and concerns" or "concerns and ideas" – to make the mechanism feel more approachable and less adversarial.

However, changing the terminology carries risks. If framed only as a channel for "feedback" or "ideas," workers may hesitate to report serious violations – including harassment, violence, or exploitation – because the mechanism no longer feels like an appropriate or safe place to do so.

The solution is not simply to rename the mechanism but to lower the linguistic barrier while maintaining clarity about its purpose. Many sites found that framing the process around everyday, relatable concepts – such as "problems at work," "issues that affect you," or "things that need fixing" – helped encourage early reporting while still clearly communicating that serious concerns can and should be raised. Clear communication, training, and representative involvement are essential to ensure workers understand that all issues – from everyday problems to severe misconduct – can be raised safely and confidentially. What matters is not the terminology alone, but ensuring that workers understand:

- What the mechanism is for,
- How to safely report different types of issues, and
- That all concerns – from minor problems to severe violations – will be handled seriously, confidentially, and without retaliation.

This shift proved particularly important in a UK-based company where minor issues were often left unreported because workers were unsure whether they qualified as grievances. Yet, these minor issues were valuable for management to address. During two meetings, the GM taskforce established at the site, developed a more inclusive definition and scope for reporting, encouraging workers – especially women and marginalised groups – to share concerns without fear or uncertainty.

To better understand the impact of changing terminology, the GM taskforce conducted sessions focused on:

- Testing new names for 'grievance'
- Identifying topics workers valued discussing with the company
- Exploring different ways to report problems or issues

In one session, the taskforce discussed potential names for the company's mobile app feature designed for feedback. "Speak Up" and "Let Us Know" emerged as the most popular options due to their approachable and non-intimidating connotations. An earlier suggestion, "Innovate, Question, Concern?" was rejected for being too complicated. There was also a strong consensus that "grievance" was a heavy term, with some workers even feeling reluctant to attend taskforce meetings due to its negative implications.

Flashcards featuring various grievance topics were distributed to help identify relevant concerns. Workers added issues such as holidays, childcare, bonuses, site safety, and agency staff resourcing, highlighting the wide range of topics they wanted to address.

Ultimately, the taskforce recommended using "Speak Up" as the replacement term, noting its positive and inclusive tone. However, they also recognised the need for training to clarify the scope of issues workers could "speak up" about, ensuring the feedback mechanism was both comprehensive and effective.



Embracing workers' input

A company based in Türkiye initially proposed a closed-door approach to reviewing the grievance mechanism. Instead of involving workers in a gap analysis of the policy, the company preferred to conduct an internal review to identify potential issues before engaging with workers. This approach highlighted an underlying reluctance to listen to worker input and fell short of identifying the real gaps in the policy, as later revealed by a worker survey.

Early in the project, as part of the work done with the project team, the supplier recognised the need to shift its mindset, and became more open to embracing workers' voices and understanding the challenges they faced with the company's grievance mechanism.

The company originally kept the grievance mechanism open-ended, without a predefined list of potential issues, in an attempt to encourage workers to voice any grievances freely, without feeling restricted. However, this approach had unintended consequences. Workers struggled to understand which concerns were appropriate to raise through the grievance mechanism, as the lack of clear guidance made it difficult for them to grasp the system's scope. As a result, the GM saw limited use at the supplier site.

Through support sessions with company management, it became clear that providing workers with examples of potential grievances – such as pay and benefits, working conditions, interpersonal issues, human rights, and gender-based concerns – would increase engagement.

The company realised that by offering a clearer framework, the GM could be more accessible, leading to better participation and more effective grievance resolution. While we do not have the results of the mechanism yet, this example illustrates the mindset shift journey that the company went on.

4.4 Active worker engagement and participation

An effective grievance mechanism requires active worker engagement in both its design and implementation, rather than treating them as passive users. This involves creating collaborative platforms where workers and management can discuss grievances transparently and fairly. By empowering workers to participate meaningfully, companies can build trust and ensure the grievance system is practical, trusted, and widely used.

Key ingredients

As detailed in Section 3 , companies that successfully engaged workers applied three approaches, positioning workers as active participants:

- **Co-design and collaboration:**
  - Set up a Grievance Mechanism Taskforce with representatives from both workers and management to co-design the mechanism, ensuring it aligns with workers' realities.
  - Establish a Grievance Committee as an ongoing forum for transparent and fair decision-making.
- **Empowering grievance officers:**
  - Appoint workers, rather than only HR staff, as grievance officers to build trust and make the system more accessible.
  - Allocate paid time for grievance officers, enabling them to perform their roles effectively without impacting their workload.
- **Embedding in workplace culture:**
  - Integrate grievance mechanisms into broader social dialogue to strengthen worker-management relations and foster a collaborative environment.



Enhancing inclusivity through worker-elected representatives

In a project with a company in Malaysia, it became clear that a significant portion of the workforce consisted of migrant workers speaking multiple languages. Many felt at ease raising concerns with someone who shared their language and background. Yet the existing system relied on worker representatives *appointed* by HR, which undermined credibility and excluded some groups.

As part of the project, the company introduced a worker-led election process to select representatives to sit on the site's joint worker–management committee responsible for providing input to the implementation of the grievance mechanism concerns and for improving overall workplace communication. While HR provided only logistical support (e.g., coordinating times and materials), the nomination and voting processes were led by workers themselves to avoid undue influence.

This shift improved legitimacy and broadened representation. Workers elected two representatives each from the Bangladeshi, Burmese, and Nepalese migrant communities, as well as two local male and two local female representatives. The result was a more inclusive structure, giving workers of different languages, genders and backgrounds the option to raise concerns through people they knew and trusted.

Building confidence through GM taskforce training and gap analysis

In Spain, the GM taskforces at two supplier sites were trained on a comprehensive approach to grievance mechanisms, its significance, and the methodology for conducting a gap analysis to assess and improve existing grievance processes. This training provided both taskforces with practical tools and frameworks developed by the project team to effectively evaluate and enhance their current systems.

With guidance from the project coordinator, the taskforces led the gap analysis at each supplier site, identifying key shortcomings in the existing grievance mechanisms. Through this process, they gained valuable insights into areas for improvement, such as accessibility, worker participation, and transparency. The taskforces then developed concrete, actionable plans to address these gaps, ultimately strengthening the grievance mechanisms and improving their overall effectiveness in addressing workers' concerns.

This approach not only empowered the taskforces with the confidence to assess and improve their systems but also fostered ownership and a deeper commitment to continuous improvement of the grievance mechanisms.

4.5 Comprehensive and tailored design

Effective grievance mechanisms are not a one-size-fits-all solution; they must be tailored to the cultural, legal, and operational context while maintaining the same standards of effectiveness, robustness and safety. Adapting a mechanism does not mean lowering expectations – it means designing processes that are relevant and trusted in each setting, without compromising core principles such as accessibility, transparency, and gender sensitivity. In some contexts, prevailing social or workplace norms can even undermine the effectiveness of grievance mechanisms – for example, hierarchies that discourage speaking up, gender norms that limit women's participation, or cultural expectations that favour informal resolution over formal reporting. Tailored design must therefore account for these dynamics and actively work around them.

A common factor across all the initiatives is that suppliers who engaged their workers early and continuously reported significant improvements in grievance handling. Worker insights proved essential for shaping mechanisms that are genuinely inclusive, context-responsive and capable of addressing workers' needs.

Key ingredients

- **Context-specific adaptation:**
  - Tailor grievance mechanisms to different cultural and operational environments, ensuring they are accessible, relevant, and effective.
  - In regions with low literacy rates, use visual or oral reporting methods, while highly regulated industries may require detailed documentation and compliance mechanisms.
- **Worker-centric design:**
  - Engage workers from the start by establishing a taskforce with management and worker representatives to co-design or review the grievance policy.
  - Use multiple channels for reporting, including confidential suggestion boxes, phone lines, and digital platforms, to ensure accessibility for all workers, including marginalised groups.
- **Apply a gender lens:**
  - Address gender-specific barriers by providing gender-responsive training for all staff involved in handling grievances and, where appropriate, appointing female grievance officers to increase accessibility and trust.
  - Create safe spaces and multiple access points for women – both formal and informal – so they can raise concerns without fear, reprisal, or stigma.
  - Strengthen the role of women in the governance of grievance processes by establishing a dedicated "gender committee" or integrating women meaningfully into existing structures (e.g., workplace committees, worker representatives, or trade union bodies) to ensure gender-related concerns are surfaced and addressed effectively.



Strengthening grievance mechanisms through tailored, worker-driven channels

A supplier company in Egypt identified a significant gap in its grievance mechanisms, which had relied solely on workers reporting issues to their supervisors. This approach created several challenges: a lack of anonymity, discomfort among female workers in raising gender-sensitive concerns, and potential conflicts of interest arising from supervisors being the primary contact point.

To respond, management proactively engaged with workers by organising small group discussions and conducting regular shop-floor visits to understand their experiences and preferences. In the absence of a labour union, these were among the first structured opportunities for dialogue. Workers openly described the barriers they faced and highlighted the need for more accessible and trusted ways to raise concerns.

Based on this feedback, the company introduced several new channels – all of which were suggested directly by workers – including 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 were welcomed innovations because they reflected workers' own priorities and were perceived as meaningful alternatives.

The introduction of these changes initially met resistance from some supervisors, who felt excluded from the process. Management therefore held open sessions with supervisors to clarify that they remained an important point of contact, while workers would now have additional options depending on their needs and comfort levels. This process helped build mutual understanding between HR and supervisors and ensured a more inclusive, diverse and accessible grievance mechanism.

4.6 Building trust in the grievance mechanism

Trust is the cornerstone of effective grievance mechanisms. Companies must create an environment where workers feel safe to voice concerns without fear of retaliation. Building trust requires more than collecting information from workers – it depends on open dialogue, ongoing collaboration, and meaningful responses. Two-way communication, where workers are informed, involved, and genuinely listened to, helps establish this trust. Creating structured opportunities for workers and management to discuss how the mechanism works, clarify expectations on timelines, and understand how decisions are made strengthens confidence and encourages sustained participation. Ultimately, trust grows when workers see that raising concerns leads to respectful engagement, constructive dialogue, and tangible change.

Capacity building can also be an important aspect of building trust, but it must go beyond one-off training sessions. Workers and managers need to be equipped with practical tools, accessible information, and ongoing support that enable them to participate meaningfully in the mechanism. This includes strengthening workers' ability to articulate concerns, engage in dialogue, and understand their rights, as well as improving managers' skills in listening, responding constructively, and applying fair processes. As workers gain the knowledge and confidence to use the mechanism – and see their involvement contribute to real improvements – trust steadily deepens.

Key ingredients

- **Safe and accessible reporting:**
  - Enhance communication channels and introduce anonymous reporting mechanisms to ensure workers feel safe and empowered to voice concerns.
  - Address language and literacy barriers by using multiple communication methods, such as leaflets, posters, newsletters, and online portals.
- **Transparency and dialogue:**
  - Communicate grievance processes, timelines, and outcomes transparently to build trust and encourage participation.
  - Create opportunities for two-way dialogue – such as group discussions, worker committees, or facilitated conversations – so workers can give feedback, ask questions, and influence improvements.
  - Engage workers in monitoring and evaluation to support accountability, legitimacy, and shared ownership of the mechanism.
- **Worker participation and empowerment:**
  - Equip workers with practical tools and information that enable meaningful participation, helping them understand their rights and engage confidently in the process.
  - Use regular engagement – through meetings, short awareness sessions, and feedback platforms – to ensure the mechanism evolves in response to workers' experiences and needs.
  - Continuously improve the grievance process based on worker feedback and active participation, cultivating a participatory and inclusive workplace culture.

- **Capacity building for workers and management**
  - Provide ongoing, accessible learning opportunities – not just one-off training – to deepen workers' understanding of grievance mechanisms and how to use them (these could also be short shop floor sessions).
  - Strengthen managers' skills in listening, responding fairly, and engaging in respectful problem-solving.

Building trust in GM for low-literacy workers

A supplier in Pakistan faced challenges engaging its low-literacy workforce in the grievance mechanism. Traditional written tools – such as surveys and forms – were ineffective, so the supplier introduced an interactive, dialogue-based approach. Workers participated in facilitated sessions on rights and workplace rules, using red and green cards to express agreement or disagreement on key topics.

While this helped gather worker feedback, trust in the system remained limited. To strengthen communication and build rapport, the supplier appointed a grievance officer fluent in the local language. The officer held regular informal discussions with workers, ensuring they had a safe space to raise issues and receive timely explanations and follow-up. Over time, this combination of interactive engagement and a trusted focal point significantly improved worker confidence in the grievance mechanism.

"We tackled the language barrier and low literacy levels by assigning someone from the team who speaks the local language. This person has become the workers' trusted point of contact.

– Supplier, Pakistan

In India, another supplier implemented a series of regular meetings aimed at fostering greater worker participation. Initially, workers were reluctant to speak up, but with sustained efforts to build trust and rapport, the supplier saw a positive shift in engagement. As the supplier noted:

"None of the workers spoke in the first month of the meetings; we had to make an effort and gain their trust. Now, we get good responses."

– Supplier, India

Adopting safe and inclusive channels to boost trust

Building trust across diverse worker demographics requires raising awareness about available grievance channels, clearly communicating operational processes, and reassuring workers that they will be protected from retaliation for raising concerns. Additionally, efforts to remove access barriers, such as introducing gender-sensitive measures, can significantly enhance the inclusivity and effectiveness of grievance mechanisms. For example, supplier companies in China ensured that female workers had access to female representatives to confidentially share their concerns. Similarly, in India, a company appointed specific representatives for contracted workers, which helped overcome fears of reporting issues within that group. These actions were crucial in building trust across diverse worker demographics.

Strengthening transparency and accountability to foster trust

A supplier company in China saw improvements in communication and trust between workers and management after their active participation in the grievance mechanism. Previously, the workplace relied on suggestion boxes that were opened only once a month by a management representative – an approach that offered limited credibility, timeliness, or opportunities for dialogue.

As part of the project, the company introduced clearer procedures and shared oversight to improve accountability. The suggestion boxes are now checked at an agreed and more frequent interval, with both the designated administrator and a worker representative present each time.

While suggestion boxes remain only one of several channels and are **not a substitute for meaningful dialogue or a fully functioning grievance mechanism**, these changes have increased worker confidence that concerns will be handled consistently, transparently, and without interference.





4.7 Continuous improvement and cultural integration

Effective grievance mechanisms cannot be static; they must be living processes that evolve over time and are deeply embedded within the company's cultural fabric. This process begins by weaving the mechanism into existing structures of social dialogue, aligning with trade unions and collective bargaining agreements to build a foundation of transparency and mutual trust. It requires treating the mechanism not as an isolated initiative, but as a core function supported by dedicated resources. This includes allocating paid time and providing institutional support for grievance officers.

Furthermore, companies should foster a culture of adaptive learning and must regularly monitor and evaluate the mechanism's performance, using the insights and data gathered to refine processes and ensure ongoing effectiveness and compliance. This commitment to perpetual refinement must be championed from the top. Senior leadership must consistently reinforce the mechanism's importance, allocate the necessary resources, and set the tone for a workplace culture of openness and respect.

Key ingredients

- **Long-term organisational commitment:**
  - Embed grievance mechanisms into workplace culture with ongoing institutional support and leadership commitment.
  - Allocate paid time for grievance officers and provide institutional support for their roles.
- **Leadership commitment:**
  - Secure senior management's commitment to champion the importance of grievance mechanisms.
  - Senior leadership plays a crucial role in setting the tone for a culture of openness and respect.
  - Client companies can support supplier leadership in fostering a culture of open dialogue, ensuring workers feel safe and empowered to raise concerns.
- **Monitoring and evaluation:**
  - Establish regular monitoring and adaptive learning processes to refine grievance mechanisms and maintain their effectiveness over time.

Case study

Implementing a grievance mechanism in the agricultural supply chain

Background

The project, driven by Waitrose & Partners and supported by the Oxfam Business Advisory Service (OBAS), aimed to implement an effective grievance mechanism at a small agricultural supplier in Southern Italy. The initiative aimed to enhance worker voice and address human rights risks in the sector. Initially, the absence of grievances was seen as a positive sign, but further engagement revealed that workers hesitated to report issues due to distrust and concerns over repercussions.

Project overview

The project was delivered in two phases between 2021 and 2024:

- **Phase 1** focused on designing a grievance mechanism in collaboration with workers. A **taskforce** was established, and a **new Communication Policy** was developed, introducing multiple reporting channels such as suggestion boxes, verbal grievance options, and an online platform.
- **Phase 2** focused on implementation and sustainability. Key actions included appointing **communication focal points**, forming a **Communication Committee**, developing a **grievance tracking tool**, and providing training to ensure workers understood how to raise concerns safely.

Key activities and outcomes

- **Redefining the meaning of grievances:** Initially, the absence of grievances was seen as a sign of success. However, workers hesitated to report issues due to distrust and concerns over repercussions. By clearly defining what constitutes a grievance – including minor concerns – workers became more comfortable raising issues.
- **Increased worker engagement:** Workers participated in surveys and discussions, helping to refine the grievance mechanism. As trust grew, anonymous grievances, previously non-existent, began to be reported.
- **Clear and accessible reporting channels:** Workers now have access to multiple methods to submit grievances, ensuring accessibility and confidentiality.
- **Governance and transparency:** A dedicated grievance officer and worker representatives ensured proper oversight and follow-up on reported concerns.
- **Workplace culture shift:** Open dialogue and structured engagement helped bridge gaps between workers and management, fostering trust and collaboration.
- **Resolution of workplace issues:** A range of grievances, from interpersonal conflicts to operational concerns, were addressed, leading to a more positive work environment.
- **Gender considerations:** While no gender-specific complaints were recorded, continued training on gender-sensitive grievance handling was recommended.

"The simple gesture of reaching out to workers and having a conversation with them, even if workers disagreed or perhaps were hesitant to provide input, that simple gesture made them feel needed and part of the organisation".

– Manager at supplier company

Lessons learned

- **A low number of grievances does not mean there are no problems** – workers often hesitate to report issues due to past negative experiences or fear of repercussions. Proactively engaging workers and redefining grievances to include small concerns increased participation.
- **Worker involvement is key** – creating spaces for workers to voice concerns, such as a dedicated Communication Committee, not only improved grievance reporting but also strengthened relationships between workers and management.
- **Grievance mechanisms require ongoing effort** – simply introducing a policy is not enough. Continuous training, monitoring, and adaptation are necessary to maintain trust and effectiveness.
- **Transparency fosters trust** – clear communication about grievance processes, alongside visible improvements in response to complaints, helped workers feel valued and included.
- **Grievance mechanisms should be embedded in workplace culture** – beyond policy changes, fostering a culture of open dialogue and problem-solving contributed to a more motivated workforce.

The project demonstrated that a well-structured grievance mechanism can significantly improve worker engagement and human rights due diligence. Going forward, key recommendations include ongoing worker rights training, gender-sensitive grievance handling, and periodic policy reviews. These insights provide a model for broader industry adoption, highlighting that grievance mechanisms are not just about policies but about fostering a workplace culture where workers feel heard, valued, and empowered.



5. Getting started: Actions companies can take

To successfully adopt and integrate a worker-led approach to grievance mechanisms across their supply chains, brands and buying companies need to embrace a different way of working. This means shifting from a model focused on delivering a fixed solution towards one grounded in ongoing engagement, shared ownership, and meaningful social dialogue. Central to this approach is the active promotion of freedom of association (FoA) and support for trade unions and worker representatives, ensuring that workplace grievance mechanisms complement – rather than replace or undermine – existing collective structures.

The following actions outline how companies can embed this approach, strengthen worker agency, and ensure the sustainability and effectiveness of grievance systems while fostering inclusivity and enhancing worker participation.

Key actions companies can take

1 Streamlining support

- **Customise tools and resources:** Ensure that the tools, resources, and guidance are tailored to each supplier's specific context. A worker-centred approach requires understanding suppliers' operational realities, workforce composition, and existing worker representative structures – including unions – so that grievance mechanisms are practical, credible, and rooted in local realities.
- **Enhance accessibility and usability:** Make grievance channels accessible to all workers, including women, migrant workers and those with lower literacy levels. Both digital and non-digital options should be available, informed by workers' own preferences. Accessibility improvements should be developed in partnership with worker representatives to ensure legitimacy and ease of use.

2 Deepening engagement

- **Establish clear reporting processes:** Transparent processes and regular feedback loops build trust. Workers and their representatives should understand how grievances are addressed, how outcomes are decided, and how learning feeds into system improvements.
- **Engage senior management:** Ensure that senior management, both at the supplier site and brand level, is actively involved in overseeing and supporting the grievance mechanism. Their commitment is essential for driving accountability and securing the long-term success of the system.

3 Fostering sustainability

- **Ongoing monitoring and improvement:** Conduct regular joint assessments with workers, their representatives, and unions where present to measure effectiveness of grievance mechanisms. Use both qualitative and quantitative indicators to inform adjustments and ensure the mechanisms remain relevant, accessible, and impactful over time.
- **Provide continuous support:** Offer suppliers ongoing access to expert guidance, training and advisory support to sustain grievance mechanisms beyond initial implementation. Support should reinforce workers' collective agency by strengthening engagement with trade unions and other representative bodies.
- **Encourage sector-wide collaboration:** Promote collaboration across the sector or region to raise standards and improve grievance support systems. Sectoral initiatives should actively involve trade unions, ensuring mechanisms are equitable, legitimate, and aligned with established labour rights frameworks. This will help ensure that grievance mechanisms are consistent, fair, and equitable across supply chains, benefiting all stakeholders.

By taking these concrete actions, brands and buying companies can help ensure that the worker-led approach to grievance mechanisms is effectively adopted and sustained across their supply chains, leading to improved workplace conditions and stronger relationships between workers, supply chain partners, and brands. The following text provides further detail on each action.

5.1 Streamlining support for grievance mechanisms

Tailored capacity building & support

- Recognise that each supplier's context is unique and avoid one-size-fits-all approaches. Support should align with operational challenges, workforce dynamics, and existing trade union presence, enabling a grievance system that strengthens – not substitutes – existing representative structures.
- Provide adaptable tools and guidance, such as the Grievance Mechanism Toolkit, suitable for suppliers with differing levels of capacity.
- Offer technical support during initial stages to help suppliers establish systems correctly, integrate them with existing worker representative and union processes, and fully understand the requirements.

Streamline communication and tools

- Work with suppliers to identify and remove common obstacles (e.g., language, literacy, cultural barriers, or lack of union engagement) that may hinder effective communication with and participation of workers and other rightsholders.
- Enhance the usability and accessibility of grievance mechanisms, ensuring that digital and non-digital tools (like suggestion boxes or mobile apps) are user-friendly and accessible to marginalised groups, co-designed where possible with worker representatives or unions.
- Use established networks (e.g., AIM-Progress, ETI) to support suppliers with shared learning, training, and peer exchange, facilitating wider outreach and greater support.

5.2 Deepening engagement at suppliers' sites

Senior management involvement

- Leadership plays a critical role in setting expectations and championing a worker-led approach to grievance mechanisms.
- Ensure senior management at supplier sites is actively involved in the design, implementation, and monitoring of grievance mechanisms, reinforcing their commitment to social dialogue and worker participation.

Two-way communication & building trust

- Establish regular, open communication channels between brands and suppliers – as well as between management and workers – ensuring that dialogue is safe, meaningful, and accessible.
- Ensure workers and their representatives at supplier sites are actively involved in the design, implementation, and review of grievance mechanisms.
- Grievance mechanisms should be designed to sit alongside and complement union processes, not replace or undermine them. Where trade unions exist, work with them directly. Where unions do not exist, support workers to freely organise and engage in collective dialogue without interference or intimidation.
- Enhance the capabilities of key stakeholders, including civil society organisations (CSOs), to effectively support grievance mechanisms and provide advice where necessary.
- Ensure that workers, especially women and marginalised groups, feel safe to voice concerns without fear of retaliation. This may involve appointing trusted personnel (e.g., female representatives) to facilitate open dialogue.

Monitoring and continuous improvement

- Implement regular monitoring processes that include workers and rightsholders to assess the effectiveness of grievance mechanisms. This should include both qualitative and quantitative measures to identify areas for improvement.
- Create opportunities for adaptive learning to refine grievance mechanisms over time, ensuring they remain relevant and effective in addressing emerging challenges.
- Establish clear reporting mechanisms that enable transparent tracking of grievances and responses, fostering trust in the system.



5.3 Fostering long-term sustainability

- **Sustaining support and guidance**
  - Provide suppliers with ongoing support through sounding boards, where they can seek advice and guidance from trusted partners, such as senior management, brands, and external organisations (e.g., ETF in Spain).
  - Brands can play a key role in helping suppliers by offering not just financial support, but also strategic guidance to ensure grievance mechanisms remain consistent with labour rights standards and continue to strengthen social dialogue.
- **Joint initiatives and collective action**
  - Encourage regional and sectoral collaboration to share learning, promote collective approaches to grievance resolution, and ensure sustainability. For example, an ethics committee at regional/industrial level can facilitate ongoing dialogue, monitor grievance mechanisms, and resolve complex grievances that cannot be settled at the supplier level.
  - Ensure that initiatives like ethics committees maintain balanced power dynamics, including representation from employers, employees, unions and relevant local institutions. This ensures equitable decision-making and transparency.
- **Strengthen capacity within brands**
  - Brands need to build internal capacity within sourcing, sustainability, and compliance teams to effectively support grievance mechanisms at supplier sites. This includes offering targeted training on human rights, grievance management, and supplier engagement.
- **Tailored capacity building**
  - Offer suppliers bespoke training on grievance mechanisms, tailored to their specific needs and operational context.
  - Provide ongoing technical assistance to help suppliers refine their grievance processes and resolve any issues that arise.

6. Appendix

6.1 Summary of the initiatives in scope

AIM-Progress grievance mechanism working group – roll out of the Grievance Mechanism Toolkit with selected suppliers

Having developed a Grievance Mechanism Maturity Framework & Guidance which outlined the 'what' of grievance mechanisms, with a goal of bringing members' mechanisms in line with the principles laid out in the UNGPs, the working group wanted to focus on 'how' to implement them.

They decided to roll out the implementation of the site-level Grievance Mechanism Toolkit OBAS had developed for Reckitt with a group of suppliers with the aim of improving their grievance mechanisms so workers can safely, confidently, and transparently raise issues and concerns with their employer. The project began in early 2023 and supported 19 tier-one suppliers of three AIM-Progress members in improving their site-level grievance mechanisms.

Oxfam Business Advisory Service provided guidance and support on using the toolkit and implementing relevant actions in alignment with the UNGPs grievance mechanisms effectiveness criteria. Advisory support was given throughout five phases:

1. **Development** of a self-assessment tool
2. **Introduction** to the Grievance Mechanism Toolkit and self-assessment tool through orientation webinars
3. **Two drop-in sessions** offered to small groupings of suppliers (organised by regions and sectors) to support them in the practical implementation of the toolkit and to overcome potential challenges
4. **Two sets of detailed recommendations** delivered to each supplier for improving their grievance mechanism
5. **A final follow-up session** after six months.

Read full summary of the project here.

Building on the previous roll out project, in 2024 AIM-Progress contracted OBAS to "scale up" the implementation of the Grievance Mechanism Toolkit. This phase expanded the implementation of the Grievance Mechanism Toolkit to a larger group of AIM-Progress members and their suppliers, and initiated consultations to improve the accessibility and user-friendliness of the Grievance Mechanism Toolkit. It also focused on strengthening the capacity of brands and suppliers to implement the toolkit's guidance independently, without dedicated external support.

In 2024, AIM-Progress and nine of its members launched a project to strengthen grievance mechanisms in Brazil's sugarcane supply chain. Oxfam Business Advisory Service, together with Oxfam Brazil and the National Confederation of Rural Wage Workers in Brazil (CONTAR), were the implementing partners for the initial phase, which included rightsholder roundtables in São Paulo and Alagoas, followed by a gap analysis of existing mechanisms for addressing workers' rights issues. Building on these findings, the project has since shifted its focus towards the structural conditions needed to address these issues sustainably.

This includes developing a targeted supplier capability-building programme for sugar mills in both regions, centred on strengthening human rights due diligence (HRDD). In parallel, the project is engaging with multi-stakeholder initiatives and worker organisations to explore opportunities to strengthen worker engagement and complement existing efforts.

ETI grievance mechanisms in agriculture

In January 2023, ETI launched a two-year project to improve access to grievance mechanisms for vulnerable workers in selected agricultural supply chains. Migrant and seasonal workers play a vital role in these supply chains but often face high risks of exploitation, particularly in the Mediterranean, due to illicit recruitment and employment practices. Despite company and government responsibilities under the UNGPs, no agreed approach exists to protect these workers effectively or provide meaningful remediation. Funded by the UK Government, the project has been overseen by a 20-member working group of retailers and suppliers, providing strategic guidance and access to growers.

The project adopted a two-pronged approach:

1. **Piloting grievance mechanisms** at grower level in Italy (and implemented in Spain) to facilitate workplace dialogue between workers and employers, improving access to fair complaint processes.
2. **Building a civil society network** in Côte d'Ivoire, Tunisia, and Morocco to raise awareness of labour rights and the risks of exploitation. Interest from 37 organisations led to the establishment of Digniwork, a regional network dedicated to protecting migrant workers throughout their journey.

Oxfam Business Advisory Service (OBAS) was a technical partner of the project and led primary research in Italy and Spain to understand the challenges faced by migrant workers and assess the effectiveness of existing grievance mechanisms. Working with local partners (Oxfam Italia, Oxfam Intermón and the Spanish-based consultancy Business and Human Rights), primary data was collected with over 100 stakeholder interviews with employers, experts, organisations, and academics, alongside engagement with more than 200 workers through interviews and focus groups. The research revealed that current grievance mechanisms – such as helplines and workplace channels – are largely ineffective due to barriers including lack of awareness, fear of retaliation, and language difficulties.

Building on these insights, OBAS designed and implemented a pilot programme to test a "comprehensive model" for grievance mechanisms with growers in Spain and Italy, placing a strong emphasis on active worker engagement. The pilot followed a structured seven-step process, including supplier onboarding, the establishment of formal worker engagement mechanisms, a thorough gap analysis of existing grievance processes, the development of a targeted action plan informed by the findings, implementation of the plan, review and testing of the revised mechanisms, and final integration of the improved model.

Growers in Spain and Italy were invited to participate. However, the pilot could not be carried out in Italy due to limited supplier engagement and insufficient stakeholder support to facilitate the process. In contrast, in Spain, the initiative successfully launched in the summer of 2024 in collaboration with the Ethical Trade Forum (Asociación Foros de Comercio Ético), who played a key role in on-the-ground implementation. As a result, the grievance mechanism pilot was successfully implemented at two grower sites.

Learn more about the pilot here.

Oxfam Business Advisory Service – projects on grievance mechanisms

Starting in 2021, Oxfam Business Advisory Service (OBAS) worked with Reckitt (a member of the AIM-Progress grievance mechanism working group) to develop and pilot a Grievance Mechanism Toolkit that details practical steps for companies to take in designing and implementing effective operational (site-level) grievance mechanisms, with a focus on tier one manufacturing suppliers. The overarching goal was to ensure alignment of these mechanisms with the effectiveness criteria delineated by the United Nations Guiding Principles on Business and Human Rights (UNGPs). After piloting the guidance with six factories in India, Pakistan, China and the UK, the Toolkit was published and made publicly available for all to use in 2022.

Oxfam Business Advisory Service also engaged in depth on grievance mechanisms, working closely with two producing companies over an extended period to implement the step-by-step guidance outlined in the toolkit. This was carried out in Southern Italy, where OBAS collaborated with a supplier within the agricultural supply chain of UK food retailer Waitrose (see case study in Section 4), and in Malaysia, where the approach was implemented at a shared supplier of two major consumer goods companies. These experiences allowed Oxfam Business Advisory Service to follow the entire process from start to finish, identifying challenges and bottlenecks at different stages while also observing the positive outcomes for both employers and workers.

In addition to the guidance provided in the toolkit, Oxfam Business Advisory Service has also published, presented and delivered training on grievance mechanisms to a wide range of actors including FNET, AIM-Progress and ETI members and Civil Society Organisations in Spain and Indonesia.



6.2 Activities and results of combined experience

Through individual and collaborative projects, AIM-Progress, ETI, and OBAS have gained deep, practical insights into what makes grievance mechanisms (GMs) work in real-world settings. This body of work involved direct engagement with global brands, supply chain partners, civil society organizations, and trade unions. While most suppliers had grievance mechanisms in place – such as suggestion boxes, direct supervisor communication, and an open-door policy with HR – these systems were not receiving any grievances.

Initially, both suppliers and brands assumed this lack of engagement meant there were no issues to report. However, deeper engagement with workers revealed a different reality: these systems were not yielding results due to failures in their design and implementation, rather than the channels themselves being inherently ineffective. The fact that similar channels are sometimes successfully used elsewhere underscores that effectiveness hinges on the process, including the level of trust, communication, and protection against retaliation, not just the type of channel offered. In other words, the mere existence of a grievance channel does not equate to a safe and effective mechanism. This is why across the initiatives often the same channels remained in place, but they were improved in various aspects (e.g., adding options for anonymous grievances, moving the location of suggestions boxes to more private areas, involving worker representatives in the implementation and management of the channels).

6.2.1 Activities

Across all initiatives, support focused on helping supplier companies establish effective GMs to provide workers with accessible, transparent, and trusted channels for raising concerns. Rather than prescribing a specific mechanism, the projects used the GM toolkit to emphasise the importance of the establishment process itself. Supplier sites were guided in designing, implementing, and maintaining robust grievance systems using a worker-led approach that ensured inclusivity and responsiveness to workers' needs (see Section 4). Particular attention was given to overcoming barriers that might prevent certain groups – such as women or migrant workers – from participating in the process or accessing the grievance channels.

At a glance:
AIM-Progress/ETI/OBAS work on grievance mechanisms

9 projects delivered



14 global brands engaged directly



20 additional brands and retailers reached indirectly



29 suppliers supported with hands-on advice



202 suppliers upskilled through training

186 individuals joined awareness webinars

Multiple
CSOs and trade unions engaged

Planning and gap analysis

Support typically began with a structured planning phase, which included a gap analysis to evaluate existing mechanisms and identify areas for improvement. A key element of this phase was the formation of a Grievance Mechanism Taskforce, consisting of a balanced representation of workers and management, tasked with leading the process.

Capacity building

Building capacity on-site was a crucial aspect of the support provided. Targeted training sessions and resources equipped worker representatives and Human Resources personnel with the knowledge needed to handle grievances effectively. Workforce surveys were conducted to assess workers' awareness of existing channels, identify their preferred reporting methods, and determine the scope of grievances to be addressed. To further encourage worker participation, awareness-raising materials, such as posters and booklets, were distributed.

Advice on design of the grievance mechanism

To enhance the credibility and functionality of grievance mechanisms, supplier sites received guidance on essential design elements, including multiple entry points, clear reporting procedures, and independent oversight to build worker trust. Recommendations were also provided for establishing monitoring systems and KPIs to measure effectiveness, track usage, identify trends, and support continuous improvement.

Support on implementation

Beyond the design phase, ongoing advisory support was offered to help supplier companies address specific grievances, apply best practices in issue resolution, and integrate gender-sensitive approaches. Periodic reviews – typically conducted six and twelve months after launch – allowed for the assessment of the mechanism's impact and the refinement of processes based on insights gathered.

6.2.2 Results

The initiatives emphasised a worker-led approach to designing, improving, and implementing grievance mechanisms. For most supplier sites, this approach was entirely new and presented challenges. However, where it was embraced, companies experienced multiple benefits. Organisations that actively engaged their workforce saw significant improvements in grievance handling and gained valuable insights. Many companies initially believed they understood workers' concerns, but direct engagement revealed different realities, particularly concerning gender-sensitive grievances. Although involving workers in the design and implementation of policies was not always straightforward, it proved highly beneficial.

Overall, worker engagement led to "eye-opening conversations" *(Manager, UK Company)*, challenging management's assumptions and significantly improving the handling of workplace grievances.

Short-term outcomes

This comprehensive approach enabled suppliers to establish grievance mechanisms that promoted transparency, accountability, and worker engagement. While the implementation process faced challenges and required overcoming several obstacles (see Sections 3 and 4), the initiatives achieved significant milestones.

To evaluate the effectiveness of both the process and the resulting grievance mechanisms, all initiatives were assessed against a set of key performance indicators (KPIs) designed to measure progress. The assessments focused on the quality of the process and the alignment of grievance mechanisms with the effectiveness criteria outlined in the UN Guiding Principles on Business and Human Rights (UNGPs) and the guidance provided in the Grievance Mechanism Toolkit.

Against six key areas, initial outcomes include:

1 Access

- Suppliers increased access by providing multiple channels – including anonymous options – to report grievances. These channels typically included suggestion boxes, verbal reporting options, online platforms, and designated communication focal points.
- Communication was enhanced to raise worker awareness through leaflets, posters, and regular announcements.

2 Scope

- Suppliers expanded their grievance policies to explicitly include all worker groups – contracted, migrant, and those from diverse ethnicities, genders, and religious backgrounds. This approach aims to ensure that no worker feels excluded from the process.
- Additionally, through worker engagement, suppliers defined a list of issues and concerns that can be raised through the channels.

3 Governance[1]

- Established a clear ownership structure for the grievance mechanisms, appointing dedicated personnel to oversee the system and involving workers in its implementation *(Caveat: While this approach strengthens communication for individual grievances, it is not a substitute for – and must not impede – workers' rights to freedom of association, collective bargaining, and representation by genuinely independent and democratically elected unions.)*
- Strengthened worker representation by directly electing worker representatives to participate in the GM's implementation *(Caveat: These representatives operate within a company-managed framework and should not be confused with the role and rights of independent trade union representatives. Genuine freedom of association requires workers to have the option to organise and bargain collectively through their own independent structures.)*
- In some cases, established grievance committees that included worker representatives *(Caveat: The establishment of such committees does not constitute genuine collective bargaining or independent worker representation. True freedom of association is rooted in the right of workers to form or join independent trade unions of their own choosing, without influence from management.)*

4 Process

- Improved grievance policies with clearer guidelines.
- A step-by-step process for handling grievances was developed, ensuring workers knew exactly how their complaints would be addressed.

1 It is critical to distinguish between company-sponsored grievance structures and genuine worker representation, which is achieved through independent, democratically elected unions. While electing representatives for a grievance mechanism (GM) can be a positive step for addressing individual workplace issues, it does not provide the same level of protection or collective power as an independent trade union.

5 Appeal and escalation process

- Suppliers ensured that workers had access to an unbiased party for appeals if they were dissatisfied with the initial resolution.
- The appeal option was specifically included in the policy and communicated to workers.

6 Tracking, monitoring, and learning

- Ongoing monitoring systems were set up to track the effectiveness of the mechanisms, allowing suppliers to continuously learn and improve their approach.
- Oversight and involvement of senior management further reinforced the long-term effectiveness of grievance systems.

Signs of long-term positive impact

Feedback collected during and shortly after the implementation phase of the initiatives indicates significant improvements in relationships between workers and management, as well as overall workplace dynamics. These include a shift in mindset, a better workplace atmosphere, and increased trust.

- **Shift in management mindset:**

  Managers are now more actively engaging with workers, listening to feedback, and taking concerns seriously, signalling a shift towards a more open and responsive leadership style.

  "You have to let go of assumptions about the effectiveness of the grievance mechanism and be open to assess it to understand the positive impact."

  – Supplier company in Türkiye

  "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

- **Improved workplace atmosphere:**

  Workers feel valued, with tangible actions taken in response to their suggestions, leading to a more positive and productive environment.

  "We realised the perception of the workers is extremely important and actions and openness need to be demonstrated."

  – Supplier company in Australia

- **Increased worker trust:**

  As awareness and communication around grievance mechanisms increase, workers are becoming more confident in using them, seeing actions taken when concerns are raised.

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

  – Supplier company in South Africa

Overall, these early signs suggest that the changes made are fostering better workplace conditions and creating a foundation for lasting, positive relationships between workers and management.

7. Useful resources

- Grievance Mechanism Toolkit
- AIM-Progress Grievance Mechanism Roll-Out Project
- ETI Grievance Mechanism in Agriculture website (various resources available)
- Navigating Grievance Mechanisms: A Pathway to Robust Accountability for Rightsholders, Oxfam America, 2026
- Meaningful Stakeholder Engagement: Practical guidance for companies in the agriculture and food manufacturing sector, Oxfam International, 2026
- World Benchmarking Alliance. *2023 Corporate Human Rights Benchmark Insights Report*. Amsterdam: World Benchmarking Alliance, 2024.