



GRIEVANCE MECHANISM MATURITY 1.0

FRAMEWORK & GUIDANCE



GM Maturity Framework

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INTRODUCTION

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

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





Framework STEPS

The Framework is
divided in 4 steps



Building the governance and the management system of grievance mechanisms, including within your own operations and how to engage your suppliers* on this topic



Establishing grievance mechanisms, including developing and communicating about the mechanisms



Implementing grievance mechanisms, including establishing the operating procedure, implementing remediation and ongoing monitoring



Evaluating grievance mechanisms and integrating learnings





MATURITY LEVELS

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

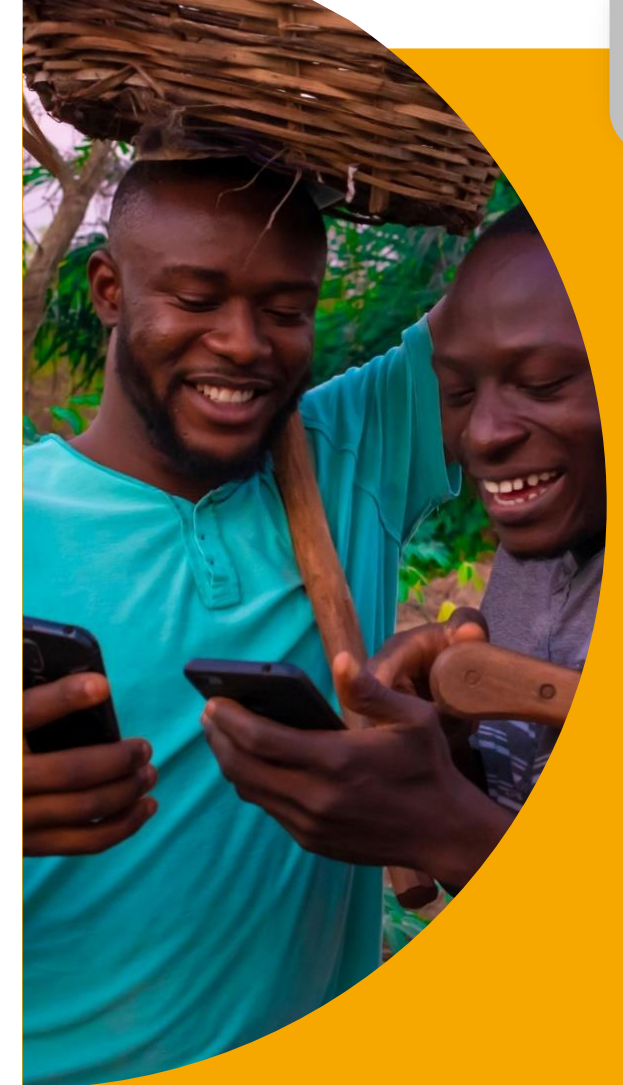


How to use THE FRAMEWORK

This framework was developed by AIM-Progress using various guidance documentation, standards and benchmarks and updated by [twentyfifty](#), following a consultation with the AIM-Progress Advisory Board and various stakeholders through public consultation. The Framework may be used as a benchmark tool or as blueprint to further embed and improve a grievance mechanism and its management systems. The Framework is designed for any company wanting to strengthen their grievance mechanisms whether they are a brand or a supplier. There is also further guidance within the Annex that details the step-by-step process to building a grievance mechanism with links to other useful documents and best practice examples from companies that are leading the way to help bring the tool to life. We recommend reviewing the definitions of key terms and the guidance in the Annex, prior to diving into the Framework to ensure a good understanding of the criteria.

This framework is available in an excel spreadsheet (“Grievance Mechanism Self-Assessment Tool”) to individually assess each grievance mechanism in place. The tool allows you to systematically check off each point against each maturity level to see where you may have gaps and opportunities for improvement.

The results of the self-assessment should be used in conjunction with the guidance in the Annex to identify adequate improvements actions to implement. Once implemented, companies should use the self-assessment tool to review where they are, reflect on learnings and establish further improvement actions to consolidate their maturity or get to the next maturity levels.

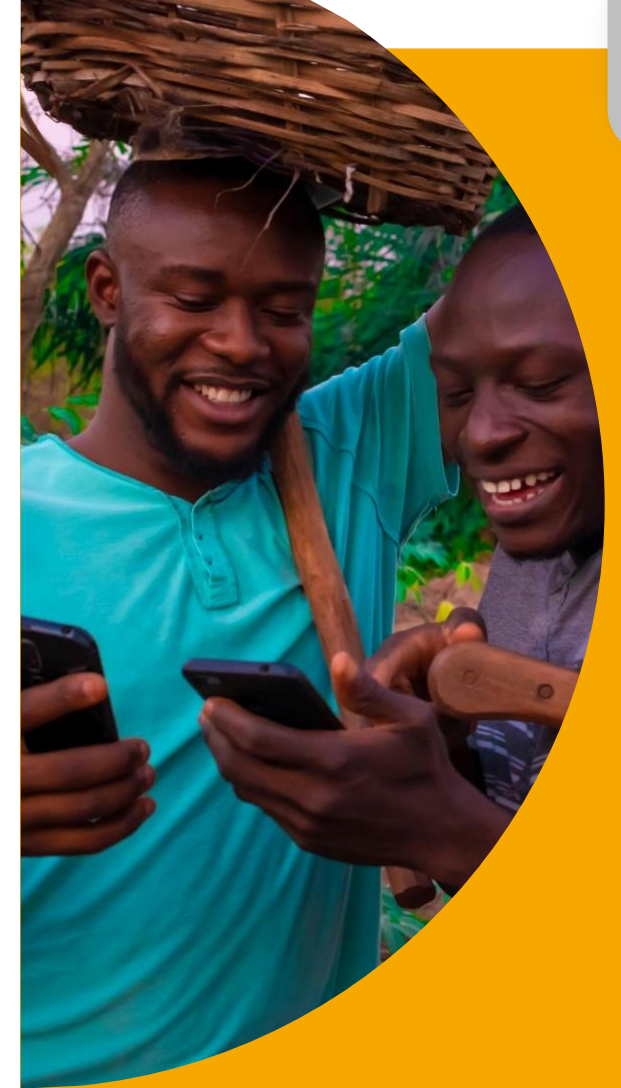


How to use THE FRAMEWORK

Definitions

This document contains several technical terms marked with an asterisk (*) and definitions of these terms can be found in the Annex. In this document, grievance mechanisms are broadly defined as the options that affected individuals or stakeholders can use to lodge complaints or disputes against a company and seek access to remedy. They may be administered by the company alone, by an independent third-party, in collaboration with other relevant stakeholders, or by a state branch or agency. They may take the form of:

Type of grievance mechanism	Examples
Direct workplace mechanisms	<ul style="list-style-type: none">• Whistle-blower / ethics hotlines• Employee ombudsman / human resources complaints processes• Open door / speak up policies• Suggestion/feedback boxes / worker voice tools• Worker committees / trade unions / industrial relations processes
Supply chain mechanisms	<ul style="list-style-type: none">• Direct stakeholder engagement (at site level and the policy level)• Business-to-Business contract clauses with dispute resolution provisions• Code of Conduct requirements for supplier mechanisms• Audit processes and worker interviews• Multi-stakeholder initiative / sector initiative / certification body complaint mechanism• Community-facing mechanisms
State-based mechanisms	<ul style="list-style-type: none">• OECD National Contact Points• National Ombudsmen• National hotline e.g. UK Modern Slavery helpline• National court system / labour dispute body / human rights institution



01 Building the governance and management system of grievance mechanisms



OWN OPERATIONS

This section covers the governance and management system of the mechanism at your own operations level, including policies related to raising grievances, process to manage grievances, and roles and responsibilities.

LAUNCHED

We are committed at the leadership level to developing and implementing effective grievance mechanisms at the operational level.

We have appointed someone within our operations responsible for embedding grievance mechanisms in our business and continuously identify ways of improving them.

We have one or more channels for communicating a grievance (own, third party or shared) which our own employees can use to raise complaints or concerns including in relation to human rights issues.

We have a clear statement to non-retaliation making clear that complainants will not be disadvantaged or punished as a result.

We have a clear statement that the company does not impede access to state-based mechanisms* and does not impede access by competent authorities investigating and adjudicating credible allegations of human rights impacts.

ESTABLISHED

We have committed that our operational level grievance mechanisms will work towards the UNGP effectiveness criteria.

We have a clear process in place for how complaints are assessed, assigned, acknowledged, investigated, resolved, followed upon, and closed with an indicative timeframe for each stage of the process.

We have clear, designated roles and responsibilities for both the department and individual personnel assigned to the mechanisms.

We have procedures in place to protect complainants' personal data and protect them against retaliation, loss of earnings or prejudice of any kind.

We have one or more channels for communicating grievances (own, third party or shared) through which employees and external individuals or communities directly or indirectly impacted by our own activities, or by individuals or organisations acting on our behalf, can raise complaints or concerns.

INTEGRATED

We have a single coordination point accountable for managing the grievance process, who assesses and assigns the grievance, formally acknowledges it, and outlines the processing timeline.

We define clearly who manages the process and the role and responsibilities of each person and organisation involved in the process.

We appropriately train employees responsible for handling incoming grievances to ensure grievances are handled in a timely, consistent, systematic, and impartial manner.

We ensure employees have the option to speak with a representative that they identify with when raising a sensitive gender-based grievance.

We monitor compliance with our policy on non-retaliation against complainants.

LEADERSHIP

We have a grievance committee set up to enable the process to be overseen by a broader group of internal stakeholders which is representative of the workforce (language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.)

We have a specific procedure in place for gender-based grievances such as sexual harassment and discrimination. It guarantees strict confidentiality, the involvement of workers that the complainant identifies with in the process and a timely resolution*.

We engage with other AIM-Progress members to discuss and resolve complex issues that cannot be resolved alone to define a joint approach and response.



01 Building the governance and management system of grievance mechanisms



SUPPLIER* ENGAGEMENT

This section covers the governance of grievance mechanisms at the supplier level, and the engagement approach and expectations regarding supplier site-level grievance mechanisms. Please note: Companies should ensure they have a good understanding of the effectiveness of grievance mechanisms in their own operations before discussing grievance mechanisms with their suppliers*, so as to engage with suppliers* in a credible way.

LAUNCHED

We are committed at the leadership level to supporting our suppliers* to develop effective grievance mechanisms.

We have appointed someone within our sourcing team or similar to be responsible for engaging suppliers* on embedding grievance mechanisms in their business.

We indicate in our supplier code of conduct, contract, or equivalent document our requirement that our suppliers* need to:

1. Develop their own grievance mechanisms (own, third party or shared) through which affected individuals or groups of individuals can raise complaints or concerns including in relation to human rights issues.
2. Commit to non-retaliation, making clear that the person who submits a grievance will not be disadvantaged or punished as a result.
3. Not to impede access to state-based mechanisms* and not to impede access by competent authorities investigating and adjudicating credible allegations of human rights impacts.

ESTABLISHED

We engage in dialogue with our suppliers* about mapping existing grievance mechanisms, developing their own, monitoring and evaluating the results and having ownership of the process for handling grievances.

We extend our own grievance mechanism to our direct suppliers* when specific circumstances prevent them from establishing their own grievance mechanism, for example if they do not have the capability to develop their own, or if they operate in a geography with poor governance.

INTEGRATED

We support our suppliers* in making their grievance mechanisms available to all individuals or groups of individuals directly or indirectly impacted by their activities, or by individual or organisations acting on their behalf.

LEADERSHIP

We require our key suppliers (high risk and strategic) to provide us with an overview of the trends of types and numbers of relevant grievances received, the remedy provided, the outcomes and how they deal with issues raised.

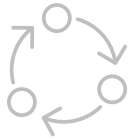
We analyse the grievances data received from our key suppliers* (high risk, strategic) to identify trends, gaps and opportunities and work together to improve their grievance mechanisms.

We require our key suppliers* (high risk, strategic) to share the planned or proposed changes they plan to make to systems and procedures to prevent future adverse impacts.

We take into account our suppliers*' actions in our commercial decisions, giving advantage to those who demonstrate commitment and continuous improvements.



02 Establishing grievance mechanisms



STAKEHOLDER ENGAGEMENT AND DEVELOPMENT

This section covers the development of grievance mechanisms, whether you already have one in place or not, including stakeholders to engage and how they can help design and consolidate grievance mechanisms.

LAUNCHED

If no grievance mechanism is in place, we build in house capability by mapping:

1. Individuals or groups of people who might be affected directly and indirectly by our business activities
2. Where they may be typically located
3. What types of grievances they could potentially raise with our business
4. Any ways in which the groups identified can currently contact our business about concerns they may have.
5. Local labour laws and regulations relevant to raising grievances such as freedom of speech and association, of countries we operate in and our key sourcing countries (high-risk, strategic).

We map the process of our existing grievance mechanisms (if any), understand how it is or is not being used, and identify any gaps, including groups it might not be relevant to, and potential grievances it might not appropriately cover.

ESTABLISHED

If no grievance mechanism is in place, we engage with potential users* to identify adequate ways for them to raise grievances and design a grievance mechanism relevant to their group, location and potential grievances.

We adapt our existing grievance mechanisms based on the individuals or groups who might be affected, where they are typically located, the political and cultural context, and the type of channels that are the most appropriate for each individual and group to report grievances.

We consider existing mechanisms to collaborate with service providers when appropriate and avoid excessive multiplication of grievance mechanisms to ensure effectiveness.

INTEGRATED

We engage with external stakeholders to ensure our grievance mechanisms address potential barriers (language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.) to raise grievances within the design of our grievance mechanisms.

We respect the role of trade unions and other forms of workers' organisations and engage with them in the design, development, implementation of the mechanisms to ensure it complements the existing collective labour relations structure.

LEADERSHIP

We actively and regularly engage with trade unions, potential users* and external experts in all aspects of the grievance mechanism (design, development, implementation, and performance) to improve legitimacy, accessibility, efficiency and build confidence.

We regularly provide feedback to stakeholders on how their inputs have been considered, taking into account the situation and possible vulnerability of the stakeholders when sharing feedback.



02 Establishing grievance mechanisms



ACCESSIBILITY & AWARENESS

This section covers the accessibility and communication of grievance mechanisms to potential users*.

LAUNCHED

We have mapped specific characteristics of potential users* including language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, awareness.

We inform all our own employees of the existence of the grievance mechanism(s) at the time they are hired, and inform them that complaints can be submitted anonymously, and that confidentiality is respected.

We display information about the grievance mechanism(s) in the workplace and employees* are updated on a regular basis of its availability and how to use it.

ESTABLISHED

We clearly, widely and regularly communicate about the existence of grievance mechanism(s) to potential users* and how to use it, including in the main language(s) spoken.

We communicate about the mechanism through the recognised trade union or other workers' organisations when it exists and encourage them to promote it to potential users*.

We create multiple access points to the grievance mechanism(s) to ensure awareness and accessibility (considering language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.).

INTEGRATED

We engage with local stakeholders including civil society groups to improve awareness and accessibility among groups facing potential barriers as well as vulnerable groups.

We provide regular training to employees* to ensure they are aware of and can access the grievance mechanism(s).

We provide training that includes awareness of gender-based grievances and how to raise these grievances.

We provide training that is available in a variety of languages to ensure all workers can understand the information.

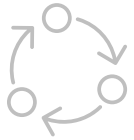
LEADERSHIP

We run dedicated awareness-raising sessions on grievance mechanisms for women and vulnerable or marginalised potential users* and provide safe spaces for women to meet and discuss.

We ask worker and union representatives present during training to help workers with future complaint processes if needed. They also are able to raise concerns on behalf of workers who contact them.



03 Implementing and monitoring the grievance mechanism



PROCEDURE

This section covers how grievances are handled including roles and responsibilities.

LAUNCHED

We accept anonymous grievances and respect confidentiality regarding the individuals who submitted a complaint and we do not share or reveal its content.

We do not require complainants to waive their rights to bring a claim through judicial process.

We appoint an internal or external stakeholder who has the relevant knowledge and expertise to investigate the complaint and determine who needs to be consulted. The facts which led to the grievance, who the responsible party is, and the desired remedy are established in dialogue with the complainant.

We inform the complainant about the grievance process, roles and responsibilities, and timeframe. We keep them informed of the progress of the procedure.

ESTABLISHED

We allow and support the complainant to seek assistance and representation (e.g. a trade union, person of same gender, anyone the complainant may choose).

We prioritise grievances related to human rights and cases where the complainant or other persons may be at risk.

We investigate allegations diligently, promptly, impartially, with due consideration to confidentiality.

We have an appeal process allowing for issues to be elevated to a review committee, an independent moderator or third party.

INTEGRATED

We identify whether complainants come from vulnerable marginalised groups and take it into account during the handling of the complaint.

We integrate or link existing channels for receiving complaints such as trade union/workers organisations/industrial relations processes, audit process (workers interviews), worker voice tools, maintaining confidentiality.

We have appointed a diverse group of potential user representatives to investigate grievances related to discrimination, mistreatment, harassment, or abuses based on language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.

We ensure the investigator/s can demonstrate awareness of gender issues and influence of unconscious bias in investigations.

LEADERSHIP

We give explanations and report on the result of the grievance at the site where the grievance took place, maintaining confidentiality, to ensure transparency, improve legitimacy and build confidence in the mechanisms.

We appoint an expert, independent third party to investigate the complaint in complex or severe cases. The third party has awareness and experience of intersectional issues (language, gender, caste, race, ethnicity, social class, age, sexual orientation, vulnerability, special needs/disability, level of literacy, level of trust, etc.) and influence of unconscious bias in investigations.



03 Implementing and monitoring the grievance mechanism



REMEDY IMPLEMENTATION AND MONITORING

This section covers how the remedy procedure is developed, implemented and monitored.

LAUNCHED

We build in house capability by mapping options for remediation*, existing remedy (if any), key stakeholders to involve and when, and criteria to ensure remedy is adequate

We identify beforehand how to remedy different scenarios and, where possible, consult with external experts and potential users* around proposed remedy for identified scenarios.

We monitor the procedure end-to-end (from receipt of the grievance to closure) and compliance with agreed actions on remedy.

We identify the desired remedy in dialogue with the complainant, and we ensure that outcomes and remedies are in accordance with internationally recognised human rights guidance and adopt the higher standard in case of conflict with national legislation.

We systematically collect feedback from the complainant regarding the implementation of the remedy and the outcome.

ESTABLISHED

We assess whether we have caused, contributed or are linked to the grievance to establish our level of responsibility and therefore ensure the remedy is commensurate with our level of responsibility for the grievance.

We combine different tools and approaches to implement the remedy to address the specific nature of each individual grievance, for example if a complainant is from a vulnerable or marginalised group.

We ensure our appeal process is communicated effectively and the proposed remedy is to the satisfaction of the complainant and responds to his/her/their needs.

We provide different channels and support to appeal the proposed remedy if the complainant is not satisfied.

We ensure the remediation plan* is implemented in a timely manner.

We require regular reports on implementation by the party against which the complaint was lodged.

INTEGRATED

If we have directly caused the grievance:

We consult the complainant and/or its appointed representative to co-develop the remediation plan*. The plan includes corrections and actions to address the root causes. The action plan protocol promotes dialogue and mediation to support resolution*. We consider existing remediation channels when co-developing the remediation plan*.

We appoint an independent third party to monitor the implementation of the remediation plan*.

We monitor existing channels for receiving complaints such as trade unions/workers organisations/ industrial relation processes, audit process (workers interviews), worker voice tools.

We identify and engage with local stakeholders and organisations, such as women, LGBTQI or minority rights' organisations, to provide appropriate support to those affected.



LEADERSHIP

We share publicly about our level of responsibility for the grievance and our remediation plan* for severe grievances, including the process, actions and timelines, via the most appropriate communication channel and ensure confidentiality.

We ensure that remediation outcomes accord with the higher standard in case of conflict between national legislation and international norms on human rights.

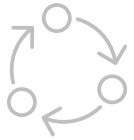
When impacts cannot be remedied alone, we collaborate with other AIM-Progress members, if relevant, as well as other peers and partners to provide remedy.

We identify any adjustments that might be required, whilst monitoring the implementation of the remediation plan*, to reflect changing understandings of how to prevent the grievance from being repeated.

We help and propose other channels/organisations, to resolve the issue if we failed to provide a satisfying solution to the complainant (e.g. ombudsman, OECD National Contact Point, legal action...).



03 Implementing and monitoring the grievance mechanism



REMEDY IMPLEMENTATION AND MONITORING

This section covers how the remedy procedure is developed, implemented and monitored.

LAUNCHED

ESTABLISHED

INTEGRATED

LEADERSHIP

If we have contributed to or are linked to the grievance:

We engage with suppliers* to understand the reported grievances, discuss and co-develop the remediation plan*

We encourage suppliers* to appoint an independent third party to monitor the implementation of the remediation plan* and provide support if necessary.

We request suppliers* to monitor and communicate existing channels for receiving complaints such as trade unions/workers organisations/ industrial relation processes, audit process (workers interviews), worker voice tools, where relevant

We encourage suppliers* to escalate complaints and instances where the issue cannot be resolved to collaborate with other stakeholders to find a resolution

We embed access to remedy in our human rights due diligence process and continuously improve its effectiveness.



04 Evaluating grievance mechanisms and integrating learnings



EVALUATION AND CONTINUOUS IMPROVEMENT

This section covers the review of the grievance mechanism, including the process to evaluate and improve its effectiveness, and the reporting procedure.

LAUNCHED

We regularly review our mechanisms to understand how it is used or is not being used, identify any gaps, including groups it might not be relevant to, and potential grievances it might not appropriately cover, and determine what should be improved.

We systematically collect feedback from complainants regarding the grievance handling process and outcome.

We monitor the impact of our grievance mechanisms using complainant feedback.

ESTABLISHED

We set KPIs to monitor and assess the performance of the mechanisms. KPIs are set for both the department and individual personnel assigned to the mechanisms, at own operations and at supplier* engagement level.

We have a centralised system that records all grievances received, outcomes and user feedback. The data is disaggregated per gender and vulnerable groups and is used to assess performance against the grievance mechanism's KPIs.

We report internally on the performance of our mechanisms, including number of grievances filed, topics, and number of grievances remediated*.

INTEGRATED

We have a formal review process including interviews with potential users, particularly women and vulnerable or marginalised groups, and the use of worker voice tools.

We publicly disclose the performance of our mechanisms, including number of grievances filed and resolved*, how remedy was provided and how the grievances were resolved.

We report on lessons learned to internal stakeholders and changes made to policies and systems to prevent future impacts.

We use our evaluation to enhance ongoing human rights due diligence and inform our worker engagement strategy.

We embed grievance mechanism in our human rights due diligence process to continuously improve its effectiveness.

LEADERSHIP

We have an independent third party in charge of evaluating our own operations' mechanisms and taking into account the voice of potential users and complainants.

We use our experiences from operating the mechanisms and data from our suppliers* to improve the functioning of the mechanisms and to adapt other relevant management processes, including purchasing practices when grievances are coming from the supply chain.

We continuously seek ways to take part in and support remedy collaboration when the grievances are systemic and cannot be remedied alone.

We have been able to prevent the reoccurrence of similar grievances by addressing their root causes.



DEFINITIONS

UNGP effectiveness criteria – A grievance mechanism should be:

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

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

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

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

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

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

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

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

Other definitions:

Employees: all employees, regardless of their contract terms, working within a company's operations.

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

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



DEFINITIONS

Other definitions:

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

Operational-level grievance mechanisms: Mechanisms accessible directly to individuals and communities who may be adversely impacted by a business and its activities. They are typically administered by enterprises, alone or in collaboration with others, including relevant stakeholders. They do not require that those bringing a complaint first access other means of recourse. They can engage the business directly in assessing the issues and seeking remediation* of any harm.

Operational-level grievance mechanisms perform two key functions regarding the responsibility of businesses to respect human rights: first they support the identification of adverse human rights impacts as a part of a business' ongoing human rights due diligence; second, these mechanisms make it possible for grievances, once identified, to be addressed and for adverse impacts to be remediated early and directly by the business, thereby preventing harms from compounding and grievances from escalating.

Potential users: Potentially affected stakeholders such as employees within a company's operations, contract workers, workers in the supply chain, smallholder farmers and their families, members of the community around a business facility or site, consumers or end-users. Stakeholder engagement should be inclusive with concern for the perspectives of marginalised and vulnerable groups such as women, children, minorities of any kind (ethnic, sexual, religious, gender...), indigenous peoples, migrant workers and people with a disability.

Remediation: The process of providing remedy for a negative human rights impact and to the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take range of forms such as apologies,

restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

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

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

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

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

Suppliers: Throughout this document we will refer to suppliers. Members may choose to include in this definition suppliers, labour providers, service providers, contractors, sub-contractors or other business relationships.





FURTHER GUIDANCE

01 Building the governance and management system of grievance mechanisms

A - OWN OPERATIONS

Engaging internal stakeholders

Internal stakeholders may play several critical roles when it comes to the development and implementation of corporate grievance mechanisms. Some teams will be heavily involved in communicating the mechanism to potential users, others are essential for the actual processing of a grievance, others still are vital for implementing remedial action, where necessary. Companies where internal stakeholders have been meaningfully engaged in the development of mechanisms and have been adequately trained on their role in the effective functioning of the mechanisms, tend to have much more effective mechanisms.

- The importance of organisational structure and company culture [International Council on Mining and Metals \(ICMM\), “Handling and Resolving Local-Level Concerns and Grievances”, 2019 p. 46-48](#)

Main company functions likely to be involved in the process:

- **Human resources:** May sometimes act as an intermediary between management and workers, including in grievances and disputes
- **Trade union or works council:** Can function as trusted channel to receive and handle complaints; may support company in improving performance
- **Community relations:** May serve as intermediary between the company and different external stakeholders affected by the company, or their legitimate representatives
- **Business operations:** May interact with local communities and, therefore, are needed to resolve many complaints; can also be a source of complaints
- **Legal and compliance:** Often runs existing whistle-blower procedures; understands legal considerations related to the handling of grievances
- **Senior management:** May receive some complaints directly; role in instilling accountability throughout the organization
- **Others department to include:** Procurement, Health and Safety, Corporate Affairs.

Source: [Doing business with respect to human rights](#)





FURTHER GUIDANCE

01 Building the governance and management system of grievance mechanisms

A - OWN OPERATIONS

Engaging internal stakeholders

The most effective approach for engaging internal stakeholders on grievance mechanisms varies depending on many factors such as the company culture, the stakeholder's role within the business and the level of previous engagement on topics like human rights and sustainability. Different angles can be used to make the case for grievance mechanisms with different internal audiences.

- “Making the Case Internally: Rationales for Introducing/Strengthening Remediation Processes” [Shift workshop report No. 5, May 2014](#) p.7
- Figure 1 The benefits of an effective grievance mechanism [Ipieca, “Worker grievance mechanism. Guidance document for the oil and gas industry”, 2019](#) p.7



Third Party Complaint Process for Breaches to the adidas Group Workplace Standards or Violations of International Human Rights Norms¹

The adidas Group is committed to operating as a sustainable business which is environmentally sound, respects human rights and ensures fair, safe and healthy working conditions across our global supply chain. To support this goal, the adidas Group has established sustainability policies and practices as well as a code of conduct – our Workplace Standards - which our suppliers, agents, licensees and other related service providers are expected to follow.

The Third Party Complaint Process described below is designed to assist the adidas Group fulfill its commitments to engaging our stakeholders and providing a means by which individuals and organisations can bring to our attention serious non-compliance with the adidas Group's Workplace Standards or concerns related to any potential, or actual, breach of an international human right norm that is linked to adidas Group operations, products or services.

Our process aims to ensure that such complaints are investigated and resolved in a manner which is transparent and fair.

Source: [Adidas Group Grievance Mechanism – Best Practice Example](#)





A - OWN OPERATIONS

Internal governance - Process

Examples of typical grievance handling process:



Source: IPIECA Community Grievance Mechanism Template Procedure

1. **Receive:** The responsible person(s) in the company receives and documents a complain
2. **Assess & Assign:** The responsible person(s) classifies the complaint depending on seriousness and forwards to the responsible department. Depending on the severity, different processes are triggered, and different colleagues informed. If a complaint is not accepted, it will be explicitly reported back to the complainant.
3. **Acknowledge:** The responsible person(s) in the company confirms receipt of a complaint and outlines processing timeline.
4. **Investigate:** The responsible person(s) determines who needs to be consulted. Through stakeholder engagement the facts leading to the complaint are clarified, they responsible party is identified, and what remedy is desirable is decided.
5. **Respond:** Through engagement with the affected person(s), a remediation proposal is prepared. The proposal should be specific, time-bound and agreed upon by all parties. It should also include a monitoring plan. Reparations should be responsive to the needs of the complainant and in line with international human rights standards. If the complaint is found to be unsubstantiated, it will be explicitly reported back to the complainant and may indicate other avenues of remedy.
6. **Resolve or appeal:** Grievance mechanisms should include an appeals procedure to allow for issues to be elevated to a review committee, an independent moderator or an independent third party. The appeals process shouldn't stop the complainant pursuing other avenues for remedy.
7. **Follow up and close out:** Once a resolution is agreed, it should be implemented and monitored. In some cases, adjustments might be required to reflect changing understandings as a result of implementing the resolution. To close out a resolution, parties should be asked for feedback on the level of satisfaction with the grievance handling process and the outcome.

- Comprehensive flow chart of grievance mechanism, p. 41 [Corporate Responsibility Initiative at Harvard Kennedy School, Rights-Compatible Grievance Mechanisms: A Guidance Tool for Companies and their Stakeholders, 2008](#)
- Typical grievance process, Chapter 2, p. 38-39 provides a process with details on what should happen at each stage [Global Compact Network Germany, "Worth Listening: Understanding & implementing human rights grievance management", 2019](#)
- Figure 2. Overview of the grievance mechanism procedure, p. 18-20, provides an overview of the different channels through which grievances may be raised, and the overarching steps that may be needed to resolve the grievance (see p. 19-20) [Ipieca, "Worker grievance mechanism. Guidance document for the oil and gas industry", 2019](#)





A - OWN OPERATIONS

Internal governance – Roles & Responsibilities

Examples of different roles and responsibilities required to implement

Effective grievance mechanisms require clear lines of accountability, a defined process and established roles and responsibilities. To ensure that the same standard is applied to all complaints raised and to ease the management of the process, it is useful to establish a centralised point for assessment and analysis, who can determine the best avenue for resolution from a range of options. While one department will act as the single coordination point, there will be others involved in gathering grievances, implementing responses and monitoring the process. As part of the development of a grievance mechanism, these roles and responsibilities will need to be clearly established.

ROLE			
Senior management	Single coordination point	Community liaison officer	External third parties
RESPONSIBILITIES			
<ul style="list-style-type: none"> • Only directly involved in high severity issues • A member of senior management should be responsible for strategic oversight of grievance management and ensure commitments are met • Act as a senior report for those implementing the grievance mechanism 	<ul style="list-style-type: none"> • Records, arranges for collection of additional information, consults relevant parties within organization, tracks progress, aggregates and forwards feedback from complainants • This could be a single person for large projects or a central unit within the company 	<ul style="list-style-type: none"> • Point person for affected communities • Engages with community stakeholders • Gathers complaints and feeds into the grievance mechanism • Reports progress from the company to the community • Complements general community engagement 	<ul style="list-style-type: none"> • Act as process organizers • Gather complaints • Facilitate dialogue between company and complainant • Act as witness or advisor to complainants





B-SUPPLIER ENGAGEMENT

In the supply chain context, companies can in some instances contribute to impacts that occur at the supplier level, for example, through their purchasing practices or payment terms. Companies can play an important role in incentivising those in their value chain to provide effective grievance mechanisms.

For important suppliers* (e.g. strategic suppliers* and those with a high risk of negative impacts on human rights) it's worth entering into a more in-depth dialogue, supporting them to build up effective grievance management systems and establishing regular reporting on the types and numbers of grievances they receive.

Questions you might ask your suppliers* when talking to them include:

- If a worker in your business feels they've been treated badly, how would you learn about this?
- What are the key complaints you've received from employees, workers and local communities over the last few months?
- What channels were used to communicate these to you?
- How do you currently deal with issues that are raised?
- What are typical outcomes? Do you review your guidelines and processes as a result?

Source [Global Compact Network Germany, "Worth Listening: Understanding & implementing human rights grievance management", 2019](#)





B - SUPPLIER ENGAGEMENT

- **Annex 1** “Design principles for grievance mechanisms in the context of supply chains” discusses the most important factors that should be taken into account in the design of grievance mechanisms in order to ensure they provide effective access to remedy for supply chain workers, p 43-47 [Ergon, “Access to remedy – operational grievance mechanisms”, 2017](#)
- **Annex 2** “Examples of code of conduct requirements” provides examples of clause related to supplier-level grievance mechanisms within corporate codes of conduct, p. 48-49 [Ergon, “Access to remedy – operational grievance mechanisms”, 2017](#)
- **Box 2** “‘Smart Questions’ about Supplier-Level Grievance Mechanisms?” and Annex D “Diagnostic Tool: Where are We in Our Approach to Remediation?” provide a complementary set of tools to initiate dialogue with suppliers* on grievance mechanisms and assess their maturity in relation to the topic, page 12 and page 20 Shift workshop report No. 5, May 2014
- **Table 1.** “Handling worker grievances: the challenges and how to overcome them” summarises tips and considerations to share with suppliers* to increase access and legitimacy of their grievance mechanisms p. 8 [Ipieca, “Worker grievance mechanism. Guidance document for the oil and gas industry”, 2019](#)
- **Section 2** “Entry points to worker grievance mechanisms” offers examples of channels for workers to raise grievances p. 10-11 [Ipieca, “Worker grievance mechanism. Guidance document for the oil and gas industry”, 2019](#)
- **Appendix 3** “Template site-level grievance policy and procedure for contractors” provides template text that can be included within existing contractor HR policies, p. 31-32 [Ipieca, “Worker grievance mechanism. Guidance document for the oil and gas industry”, 2019](#)

- See further resources in section Engaging with potential users and their representatives

Gap Inc. Code of Vendor Conduct

GRIEVANCE CHANNELS AND RETALIATION

The facility shall ensure that workers have means to report grievances to management, including a channel that provides for confidentiality and anonymity. The facility shall also ensure workers can bring to management’s attention grievances through means other than their immediate supervisor. The grievance system shall include addressing grievances in a timely manner and documenting grievances and management action on grievances.

The facility shall provide for a system for addressing disputes in the workplace, whether between co-workers or between workers and supervisor or manager. The facility shall ensure that such grievance channels and mechanisms for resolving disputes and grievances provide for protection from retaliation.”

Mars Supplier Code of Conduct

Guidelines on abuse, harassment and disciplinary action: “Supplier will establish written and/or verbal procedures for handling grievances from workers concerning workplace conditions and treatment.”

Guidelines on freedom of association and collective bargaining: “Supplier provides confidential and anonymous means for employees to raise grievances and records this process.”

Source: [Ergon “Access to remedy – operational grievance mechanisms”](#)



A - STAKEHOLDER ENGAGEMENT AND DEVELOPMENT

Mapping the context

Before developing a mechanism, it is important to understand the context in which it will operate. Without this step, inappropriate mechanisms may be developed, such as establishing an email-based mechanism for groups who do not have regular access to the internet or computers. Before implementing a grievance mechanism, it is critical to map:

- Potential users
 - Their needs, including those of vulnerable groups
 - The key risks they face / the concerns they may raise
 - What systems are already in place
- To conduct this mapping, follow guidance from Chapter 1 p. 18 to 29 [Global Compact Network Germany, “Worth Listening: Understanding & implementing human rights grievance management”, 2019](#)
 - To go further by mapping existing grievance mechanisms, follow guidance point 3 [Doing business with respect to human rights, Chapter 3.8](#)
 - Consider country factors by reviewing the guidance p. 36 to 39, in particular best practice boxes on how to conduct business in high risk human rights environments [Ethical Trading Initiative, “Access to Remedy. Practical Guidance for Companies”, 2019](#)
 - Review practical tips and tools for improvements, p. 77, [AIM-Progress Business Toolkit, Chapter 5 “Worker Cooperation and Communication”, p. 66-77, 2018](#)

A - STAKEHOLDER ENGAGEMENT AND DEVELOPMENT

Mapping the context

Particularly vulnerable groups could include

- Migrant workers and their families
- Temporary workers/contractors
- Women
- Children and young people
- People with physical or mental disabilities
- People with different sexual orientations
- Ethnic or religious minorities
- Indigenous groups
- Unskilled people / people with no or limited literacy
- ...

Channels for communicating a grievance

- Hotline (grievance hotline for employees or customers/ ethics and compliance hotline/whistleblower hotline, or hotline for general inquiries)
- Email address
- Complaints box
- Open-door policies/Speak-up policy
- General staff surveys
- General meetings, where participants have the explicit opportunity to raise concerns
- Meetings related to work processes (e.g. shift handovers)
- Designated contact person
- Arbitration committee
- Trade union
- Staff council
- Ombudsman
- Grievances system via public authorities or sector/multi-stakeholder initiatives (e.g. OECD NCPs)
- Audit processes (and interviews with staff)
- Hotlines/mechanisms in the supply chain
- Stakeholder engagement processes

Source: [Global Compact Network Germany](#), "Worth Listening: Understanding & implementing human rights grievance management", 2019





A - STAKEHOLDER ENGAGEMENT AND DEVELOPMENT

Engaging with potential users and their representatives

Involving potential users is crucial for ensuring the mechanism is responsive to their needs. Potential users' involvement also promotes ownership and respect for the mechanism, encouraging greater usage.

Involving representative groups enables learning from their broader knowledge about what has been tried before, what has worked and what has not. They may also support constructive engagement with potential users or act as partners when it comes to identifying and implementing remedial action.

Potential representatives to engage (depending on scope): trade unions, community groups, civil society, NGOs, representatives of indigenous groups, marginalized groups or vulnerable people.

Engaging rightsholders

Hermes, a parcel delivery service, reviewed and improved their grievance mechanism as part of their Code of Conduct roll out. They carried out focus groups with couriers and encouraged couriers to take part in surveys to better understand satisfaction levels. Through these activities they were able to identify any issues, and review how they gather feedback.

In response to this engagement, Hermes developed several routes for people to raise grievances:

- A courier forum where they can discuss issues amongst themselves and with Hermes
- A Service Provider Complaints Panel which is internal but independent of the operational part of the business
- Independent whistle blower hotline run by an external third party
- Internal escalation processes

Source: <https://www.myhermes.co.uk/code of conduct>





B - ACCESSIBILITY & AWARENESS

Accessibility means ensuring the grievance mechanism is known to all stakeholder groups for whose use it is intended and providing adequate assistance for those who may face barriers to access. Barriers to access may include a lack of awareness of the mechanism, language, literacy, costs, physical location and fears of reprisal.

- Table 2 p. 28-29 on potential barriers to, and suggested good practices for improving, access for different vulnerable groups [International Council on Mining and Metals \(ICMM\), “Handling and Resolving Local-Level Concerns and Grievances”, 2019](#) further guidance p. 24-26
- Guidance from Chapter 2 (p. 36 to 37) [Global Compact Network Germany, “Worth Listening: Understanding & implementing human rights grievance management”, 2019](#)

03 Implementing and monitoring the grievance mechanism

Implementing a proper complaint handling mechanism requires a step-by-step process, ensuring that it is undertaken in time and is of good quality. A proper implementation of a complaint mechanism also necessitates providing sufficient human and financial resources, in addition to applying assigned roles and responsibilities defined during the set-up of the complaint mechanism.

- Good practices for implementation p. 6-9 [Transparency International, Reference Guide on Complaint Mechanisms \(2016\)](#)

Guidance points and explanatory text particularly on Access (p. 20-22), Transparency (p. 23-24), Representation (p. 25-27), and Handling of complaints (p. 28-30) [Corporate Responsibility Initiative at Harvard Kennedy School, Rights-Compatible Grievance Mechanisms: A Guidance Tool for Companies and their Stakeholders, 2008](#)

Grievance mechanisms provide the framework through which the affected party can gain access to remedy. As the UNGPs set out, where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation (Principle 22).

Key questions to ask to identify if company has caused or contributed to the impact:

- Is the impact directly caused by our action / are there no intermediaries between us and the affected party?
- Would the impact cease if we stopped our action?
- Do our company's actions encourage, enable, or motivate the adverse impact?

If the answer is yes to any of these questions, the company will be responsible for providing for or cooperating in remediating the impact.



04

Evaluating a grievance mechanism and integrating learnings

Grievance mechanisms should be regularly monitored, and learnings integrated into the process. This ensures that the mechanism remains relevant and adapts to changing contexts or new information. Reviewing the effectiveness of responses to complaints can help to identify systemic changes needed to either corporate practices or the practical workings of the grievance mechanism. Evidence of effectiveness is also important for building trust amongst external stakeholders and boosting confidence in the grievance mechanism.

Source: [Ethical Trading Initiative, "Access to Remedy. Practical Guidance for Companies", 2019](#)

- Appendix B: Good practice examples of reporting on grievance mechanisms p. 50-54 [International Council on Mining and Metals \(ICMM\), "Handling and Resolving Local-Level Concerns and Grievances", 2019](#)
- Appendix 2: Reviewing worker grievance mechanisms p. 30 [Ipieca, "Worker grievance mechanism. Guidance document for the oil and gas industry", 2019](#)





A - K P I s

Developing relevant KPIs can also be instrumental in identifying trends in terms of grievances and in creating a solid basis for continuous improvement. Most companies are still on the starting blocks when it comes to this area, with only a few having developed relevant KPIs and tested them over longer periods. In the early years, many companies begin by collating and communicating output-based indicators (e.g. number of grievances processed). As grievance management becomes more advanced, impact-oriented indicators can be added (e.g. measurement of actual changes /improvements).

Source: [Global Compact Network Germany, "Worth Listening: Understanding & implementing human rights grievance management", 2019](#)

- Example of KPIs to monitor performance of grievance mechanism p. 28-29 [Ethical Trading Initiative, "Access to Remedy. Practical Guidance for Companies", 2019](#)
- Appendix D: List of KPIs that are commonly used for grievance mechanisms, along with suggested approaches for interpreting and applying them to support continuous improvement p. 59-60 [International Council on Mining and Metals \(ICMM\), "Handling and Resolving Local-Level Concerns and Grievances", 2019](#)

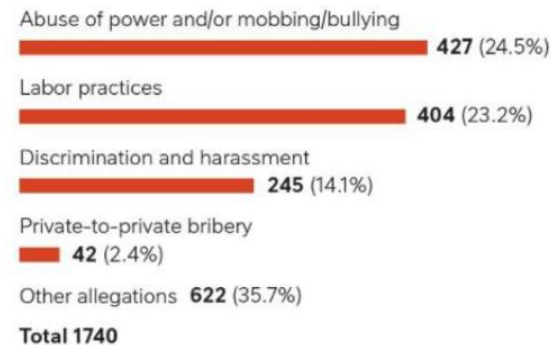
- List of KPIs p. 4 [Corporate Responsibility Initiative at Harvard Kennedy School, Rights-Compatible Grievance Mechanisms: A Guidance Tool for Companies and their Stakeholders, 2008](#)
- Different KPI categories p. 56 [Global Compact Network Germany, "Worth Listening: Understanding & implementing human rights grievance management", 2019](#)

Measuring our Nestlé Integrity Reporting System in numbers

The *Nestlé Integrity Reporting System* (NIRS) is our internal reporting system. In 2019, we received 1740 messages, as detailed in our NIRS reporting table.

Our robust system means that 1496 (86%) cases were closed and 474 (31%) substantiated. As a result, 135 employees left the company, there were 19 written warnings, and 17 suppliers' services were terminated. Where appropriate, other measures, such as internal process improvement and reinforcement, were carried out.

Number of messages received through our *Nestlé Integrity Reporting System* in 2019, by issue type (% of total)



Source: <https://www.nestle.com/csv/impact/respecting-human-rights/grievance-mechanisms>





KPIs for grievance mechanism can be divided into three categories:⁸



Indicators for measuring the mechanism's effectiveness

- The number of grievances received by a business during a particular time period (where possible disaggregated by receiving department, location, complainant group and grievance topic).
- The time needed to respond to a grievance.
- The average time needed to process a grievance or percentage of grievances resolved within a predetermined timeframe.
- The (dis)satisfaction of the complainants with the outcome of a grievance.
- The number of redress measures implemented by category (e.g. monetary, non-monetary).



Indicators for measuring the impact of the grievance mechanism on overall company performance

- Grievances or feedback from stakeholders lead to changes in the guidelines, management systems or structures of the business.
- Grievances are instrumental in revealing and tackling systemic challenges/problems.
- Grievances are instrumental in reducing interruptions to supply because problems can be more effectively addressed.



Indicators for measuring the mechanism's advantages for the business

- Grievances about the same issue are not re-submitted repeatedly.
- Decreasing number of appeals against the outcome of a grievance.
- Decreasing compensation payments.
- Decreasing number of missed working days (e.g. due to sick leave).

⁸ Adapted from: IPIECA, "Community grievance mechanisms in the oil and gas industry" (2015), p.41.

Source: [Global Compact Network Germany, "Worth Listening: Understanding & implementing human rights grievance management", 2019](#)



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