WORTH LISTENING

Understanding and implementing human rights grievance management

A business guide

Global Compact
Network Germany

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About this guide

If you're reading this guide, you're probably faced with the task of deciding how to address human rights grievances in the context of your business activities and relations. Maybe you're wondering whether your business needs a specific human rights grievance channel, or whether existing mechanisms are sufficient. Perhaps you're looking to discuss the topic with colleagues or decision-makers and need to convince them that stakeholders and, increasingly, legislators expect your company to meet certain requirements with regards to human rights due diligence. Most likely you're also wondering where to start and how to mobilise resources for an issue that's difficult for many of your colleagues to grasp and can have negative connotations. You're not alone in this.

For many, human rights grievance mechanisms are associated with complex procedures and financial risks that are difficult to gauge. **Few companies currently recognise the opportunities associated with grievance mechanisms as efficient channels of communication.**

To support you, the German Global Compact Network commissioned the management consultancy twentyfifty to develop guidance on operational-level grievance mechanisms.

This guide is intended to assist companies, including small and medium-sized enterprises (SMEs), in designing effective human rights grievance mechanisms. It provides practical advice and case studies, which show that your business is not expected to come up with a perfect, one-size-fits-all solution. Rather, effective grievance management is about providing multiple access points through which those who might be negatively affected by your company's actions can get in touch with you. What exactly such an "ecosystem of grievance mechanisms" looks like will depend on your company's business structure and risk profile.

This guide will help you develop an approach to grievance management that is in line with the requirements of the UN Guiding Principles on Business and Human Rights (UNGPs). After reading this guide, you will:

> Be familiar with the requirements of relevant international frameworks;

> Understand the methods you can use to check whether your current procedures meet the requirements for human rights grievance mechanisms;

> Know the building blocks of a human rights grievance mechanism;

> Understand and know how to improve your "ecosystem" of human rights grievance mechanisms;

> Be able to draw on practical examples from other businesses;

> Have good arguments that you can use to make the case for effective grievance management within your business.

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THE STARTING **POINT**

Most companies are already using various types of complaints mechanisms when they start implementing human rights due diligence. This means that in most cases they don't have to set up completely new processes but can start by reviewing existing procedures and check the extent to which these are suitable for handling human rights grievances. Often, companies addressing this issue for the first time are confronted with one or more of the following challenges:

❯ There is no grievance mechanism.

❯ There is a mechanism, but it is not receiving any grievances.

❯ Although there is a compliance hotline or a whistleblower portal, these do not necessarily cover grievances about human rights impacts.

❯ Grievances are not dealt with systematically but in a more ad hoc way.

❯ There is no designated person / unit within the business responsible for handling grievances.

❯ Grievance management is seen as an additional task and not an integral part of risk identification / human rights due diligence processes.

❯ Grievances are only addressed once a conflict has already occurred.

❯ The same complaints come up again and again.

❯ No remedy procedures have been developed.

❯ There is no central system to collect, consolidate and monitor grievance information and data.

This guide will help you develop the right approach, taking into account your particular starting point.

You may already be familiar with the German Global Compact Network's **Human Rights Capacity Diagnostic** (HRCD), a free self-assessment tool that helps you evaluate and improve capacities for identifying and managing human rights risks and impacts.

You can also use the tool to assess your company's approach with regards to human rights grievance mechanisms. This guide is designed to support you in enhancing the way you deal with human rights-related complaints and move from level 1 or 2, i.e. "non-responsive" or "reactive" grievance management, to at least level 3 – "efficient management". The HRCD can also help you to start thinking about the areas in which it would make sense for your business to go even further.

You can use the tool free of charge at mr-sorgfalt.de/en/hrcd. Chapter 3 of this guide provides more detail about the criteria used by the HRCD to identify an advanced grievance mechanism..

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HOW TO USE **THIS GUIDE**

You don't have to reinvent the wheel to meet the UNGPs' requirements for operational-level human rights grievance mechanisms. Most businesses already use various mechanisms, for example to process complaints from their employees or customers. The different chapters of this guide will take you through a three-step process designed to help you review and adapt your current grievance management practices to bring them in line with the requirements of the UNGPs.

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Enhance: Continuously strengthening grievance management

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› **The FIRST CHAPTER guides you through a mapping exercise** intended to take stock of your ecosystem for human rights grievances. This helps you create an overview of possible users of a human rights grievance mechanism, their potential grievances and the existing communication channels they can use to contact your company.

› **In the SECOND CHAPTER, we introduce you to the effectiveness criteria** that human rights grievance mechanisms are expected to fulfil. To help you adapt your existing mechanisms, we translate the criteria into process requirements. We also provide brief case studies that show how other companies have gone about establishing effective complaints mechanisms. We pay special attention to the issue of accessibility and its particular importance for human rights grievance mechanisms.

› **In the THIRD CHAPTER we present various approaches for continuously strengthening the way you manage grievances.** Particularly, we consider how to involve stakeholders in designing grievance mechanisms, the development of key performance indicators (KPIs) and quality information management systems, as well as collaboration with suppliers and business partners.

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GROWING **EXPECTATIONS**

In 2011, the UN Human Rights Council unanimously endorsed the UN Guiding Principles on Business and Human Rights. Developed through extensive stakeholder consultation, the principles spell out states' and companies' respective responsibilities with regard to human rights: While states have the responsibility to protect human rights, businesses have the responsibility to respect human rights – with regard to their own activities, but also supply chains and business relationships.

In order to do so, the UNGPs call for companies to implement human rights due diligence processes, including effective grievance channels. Integrating human rights aspects into management systems is an iterative process and should be done in a way that is appropriate for a company's size and potential human rights impacts. The following chapters will expand on what this means with regard to human rights grievance mechanisms specifically.

Many countries have already issued **NATIONAL ACTION PLANS (NAPS) FOR THE NATIONAL IMPLEMENTATION OF THE UNGPS**, and NAPs are under way in a number of additional countries. National Action Plans are not binding instruments, but spell out government expectations on companies as well as steps that governments themselves might take in order to foster corporate respect for human rights. The German government, for instance, has published a NAP in 2016 and is monitoring the extent to which companies with more than 500 employees are implementing core elements of human rights due diligence (including grievance mechanisms). Should the monitoring process find that by 2020 less than 50 % are meeting the NAP's expectations, the government will consider the introduction of binding rules. You can find additional information on existing and planned NAPs on globalnaps.org.

THE CORE ELEMENTS OF HUMAN RIGHTS DUE DILIGENCE

For a general introduction to implementing human rights due diligence, we recommend the German Global Compact Network's (DGCN) practical guide **"5 Steps Towards Managing the Human Rights Impact of Your Business"**. You can also find useful information on the Network's human rights due diligence info portal, **mr-sorgfalt.de/en**.

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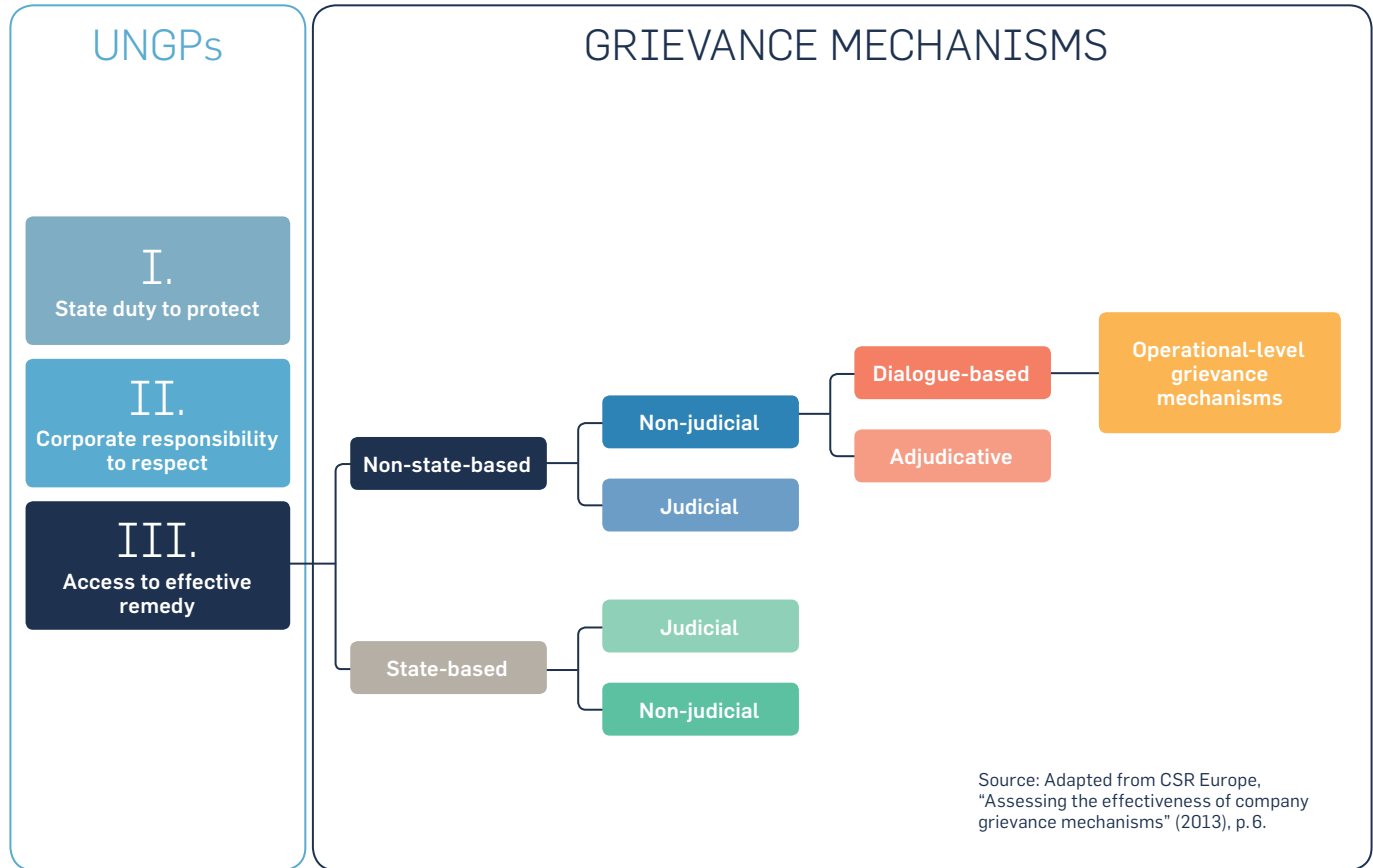**1** TAKE STOCK

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HUMAN RIGHTS are fundamental rights and freedoms that belong to all people without exception. Everyone is entitled to have their human rights respected without distinction of any kind. The International Charter of Human Rights (the Universal Declaration of Human Rights and the two most important International Covenants governing its implementation), along with the Core Conventions of the International Labour Organization (ILO), set out the main internationally recognised human rights. The human rights of specific groups are enshrined in separate treaties.

Human rights cover many different aspects of life. Human rights that are typically affected by business activities include:

- Freedom from discrimination
- Freedom of association
- Privacy rights
- Right to just and favourable working conditions
- Right to an adequate standard of living
- Right to health

Operational-level grievance mechanisms are only one element in a comprehensive human rights protection system consisting of a combination of legal, governmental and non-governmental approaches. **In it, states do not delegate their protective responsibilities to businesses:** Rather, they expect companies to contribute to the protection of human rights within their sphere of influence by establishing appropriate human rights due diligence and grievance procedures. The diagram on the next page situates operational-level grievance mechanisms within this broader context.

UNGPs

I.
State duty to protect

II.
Corporate responsibility to respect

III.
Access to effective remedy

GRIEVANCE MECHANISMS

Non-state-based
- **Non-judicial**
  - **Dialogue-based** → **Operational-level grievance mechanisms**
  - **Adjudicative**
- **Judicial**

State-based
- **Judicial**
- **Non-judicial**

Source: Adapted from CSR Europe, "Assessing the effectiveness of company grievance mechanisms" (2013), p. 6.

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WHY GOOD GRIEVANCE MANAGEMENT MAKES SENSE FOR BUSINESSES

First and foremost, human rights grievance mechanisms help identify grievances early on and therefore can be instrumental in avoiding adverse impacts on people. Unfortunately, for many companies the term "grievance" or "complaint" has negative connotations and prevents them from taking a constructive approach to the issue.

It's helpful to think of grievance mechanisms as information and communication systems that also help the company improve its processes and performance. According to this understanding, effective grievance mechanisms can be beneficial in several ways:[1]

› **Establish early warning systems.** Grievance mechanisms promote early identification and resolution of concerns, leading to better management of operational impacts and the avoidance of potential harm. They can help uncover systemic problems.

› **Build a proactive risk management approach.** Effective grievance management helps businesses reduce the risk of grievances escalating into serious and potentially longer-term conflicts, which can entail legal proceedings, protests or security incidents.

1   Adapted from IPIECA, "Operational level grievance mechanisms" (2012), p. 6

› **Meet regulatory requirements and stake-holder expectations.** Grievance mechanisms help companies identify human rights risks and manage them proactively. They are therefore an integral part of corporate human rights due diligence and help ensure that businesses are aligned with national and international legal requirements as well as with stakeholder and investor expectations.

› **Build better relationships with your stakeholders.** A well-functioning grievance mechanism demonstrates a company's willing-ness to take community concerns seriously. It also means it can respond more quickly to the needs of its stakeholders and stand out from its competitors.

› **Foster an active learning culture**, in which trends and patterns are being analysed to drive improvements. The business as a whole can learn from insights generated by effective grievance management. For instance, mechanisms can help highlight inefficiencies and problems and contribute to the prevention of accidents and illnesses.

MAKING THE CASE
INTERNALLY

One of the biggest challenges can lie in convincing colleagues of the need to review grievance and complaints management systems and make necessary improvements. The following arguments can help you get internal buy-in[2].

Risk prevention	"Grievance mechanisms can help us make sure small issues don't escalate into big problems. They can help us prevent issues from reoccurring by identifying them early on and addressing their root causes."
Data gathering	"Grievance mechanisms produce data that can give us insights into our business processes / value chain. They help us track our performance and find out whether our staff and stakeholders feel we are getting it right."
Risk management	"Grievance mechanisms are tools for identifying actual and potential impacts and managing risks more efficiently." "If we proactively identify risks, we can address issues before they become problems for our business."
Costs / Bottom line	"Effective grievance management can improve workplace morale, which can increase worker retention, reduce accidents and boost productivity." "Disputes are costly when they escalate." "We might be able to cut down on auditing costs by reducing the need for audits through stronger grievance processes." "We can also improve dialogue with workers and suppliers."

2   Adapted from Shift, "Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights" (New York, 2014) p. 7.

Strategy	"Effective grievance mechanisms help us gain and retain our social licence to operate." "They help us meet the expectations of investors and analysts." "They help us with our employer branding."
Control	"Ignorance doesn't get rid of the problem. It just means that a risk goes unmanaged." "Why put our fate in the hands of a third party? Wouldn't we prefer to identify and address risks or allegations inhouse before others confront us with them?"
Regulation	"Regulatory requirements are increasing. A growing number of voluntary and binding standards require us to establish effective human rights grievance mechanisms at operational level."
Values	"We must act because our values and our corporate culture demand it."
Sustainability	"Grievance mechanisms can build local ownership of problems."
Experience	"We do this in many other parts of our business: we have customer feedback lines/environmental clean-up processes/dispute resolution with business partners/employee channels for internal human resources issues – and have had positive experiences doing so."

CHAPTER 1: TAKE STOCK

Understanding the grievance ecosystem

This chapter helps you take stock of existing processes. It helps you develop a **mind map** that you can use to capture the "ecosystem" of grievances and grievance mechanisms in the context of your business.

The main aim is to create a comprehensive overview of potentially affected groups and existing grievance channels within your company. Don't let yourself be put off by the range of possible processes and affected groups. Once you will have built up a comprehensive overview, we will help you prioritise follow-up actions.

The chapter guides you through the following steps:

> **Creating a mind map of the "ecosystem" of grievance mechanisms in your business based on the following questions:**

> > Who are the potential users of a grievance mechanism / who might raise grievances about or in relation to your business?

> > Where are the potential users located geographically?

> > What are their possible concerns?

> > What grievance channels already exist?

> **Reflecting on the findings of your mind map.**

> **Identifying a central grievance channel in your business for the effectiveness assessment in Chapter 2.**

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1.1 IDENTIFYING
POTENTIAL USERS

A grievance mechanism is a channel through which people are able to communicate the fact that they feel negatively affected by your business and can seek remedy. Users of human rights grievance mechanisms therefore include any individuals whose human rights could be impacted by the company[3].

Task: To identify these users, ask yourself which groups of people may be affected / impacted by the (direct and indirect) activities of your company.

From the groups identified in the mind map on the next page, use the ones that are relevant for your business in your own mind map. Highlight if there are any particularly vulnerable people among the groups that are relevant for your business.

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
› …

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3   If you're interested in carrying out a human rights risk analysis, you can find further information in the DGCN publication "5 Steps Towards Managing the Human Rights Impact of Your Business" and on the information platform mr-sorgfalt.de/en.

"ECOSYSTEM" FOR GRIEVANCE MECHANISMS

...

Visitors

People who are located on the business premises

Unskilled people / people with no / limited literacy

Employees of suppliers and business partners

...

Consumers / end users

...

People who are not located on the business premises

Company employees (headquarters / other locations / production facilities)

...

Employees of other companies (e.g. cleaning, security, transport, logistics)

Communities near production sites or those which may be affected by widespread environmental impacts, resettlement or expropriation

General public

Women

Migrants

People who may be affected by the environmental impacts of the business

Children

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1.2 MAPPING –
AND PRIORITISING

You'll be able to see from your mind map that the potential users of a human rights grievance mechanism will have different relationships with your business. The range of possible complainants may seem overwhelming at times.

The UNGPs recognise that businesses have limited resources at their disposal. As with human rights due diligence in general, it's therefore acceptable to prioritise groups based on risk when establishing grievance mechanisms.

That said, as part of their corporate responsibility, businesses need to produce a comprehensive overview of all groups of people who may be affected by the company's business activities. This includes people who, first and foremost, would fall within the sphere of influence of another company (e.g. the employees of an external service provider or supplier). An as comprehensive overview as possible

will help you prioritise groups and develop specific grievance management processes that are fit for their respective purpose.

The expectations placed on the company's grievance management system depend on the risk and the type of relationship with the groups identified. The greater the human rights risk for certain people and the closer the relationship of your company to them, the greater the responsibility to establish a human rights grievance channel. For example, while a detailed procedure may be suitable for your own employees, for the staff of your suppliers it might be more appropriate to make the establishment of a grievance mechanism a condition of your supplier contracts and help build local capacity for grievance management. You can find a selection of different approaches in the following sections.

1.3 CLASSIFYING
USERS GEOGRAPHICALLY

Task: Once you've created an overview of the people who might be affected by your business activities, you should add information on where the various groups would be typically located. This allows you to add the geographical dimension to your overview and will later help you select the appropriate types of

grievance mechanism for the various groups, taking into account their cultural context and potential barriers to access.

Your profile will be very specific to your business and its structure. Here is a fictional example of what the various groups and their geographical profiles might look like for a manufacturing company based in Germany:
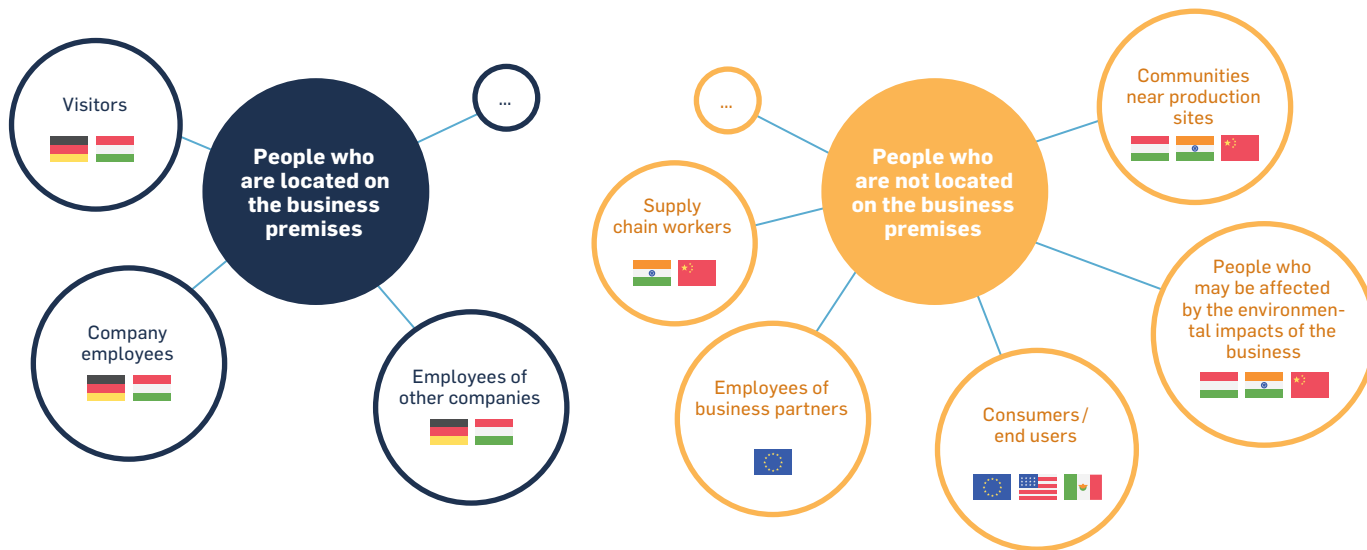
1.4 IDENTIFYING TYPICAL GRIEVANCE SCENARIOS

Task: You'll now be able to see from your mind map which groups of people might come into contact with your company and where. Next, you should consider what types of grievances the various groups of people could potentially raise with your company.

Don't limit your mapping based on the fact that your business may never have been confronted with a grievance from one of the groups. There may be various reasons for this, which we'll discuss in Chapter 2 in the section on accessibility. The aim of this part of the exercise isn't (only) to capture grievances that have actually been received, but to identify **potential grievances**. It's helpful to try and categorise different types of grievances by topic. The table below gives you an idea of some potential grievance scenarios:

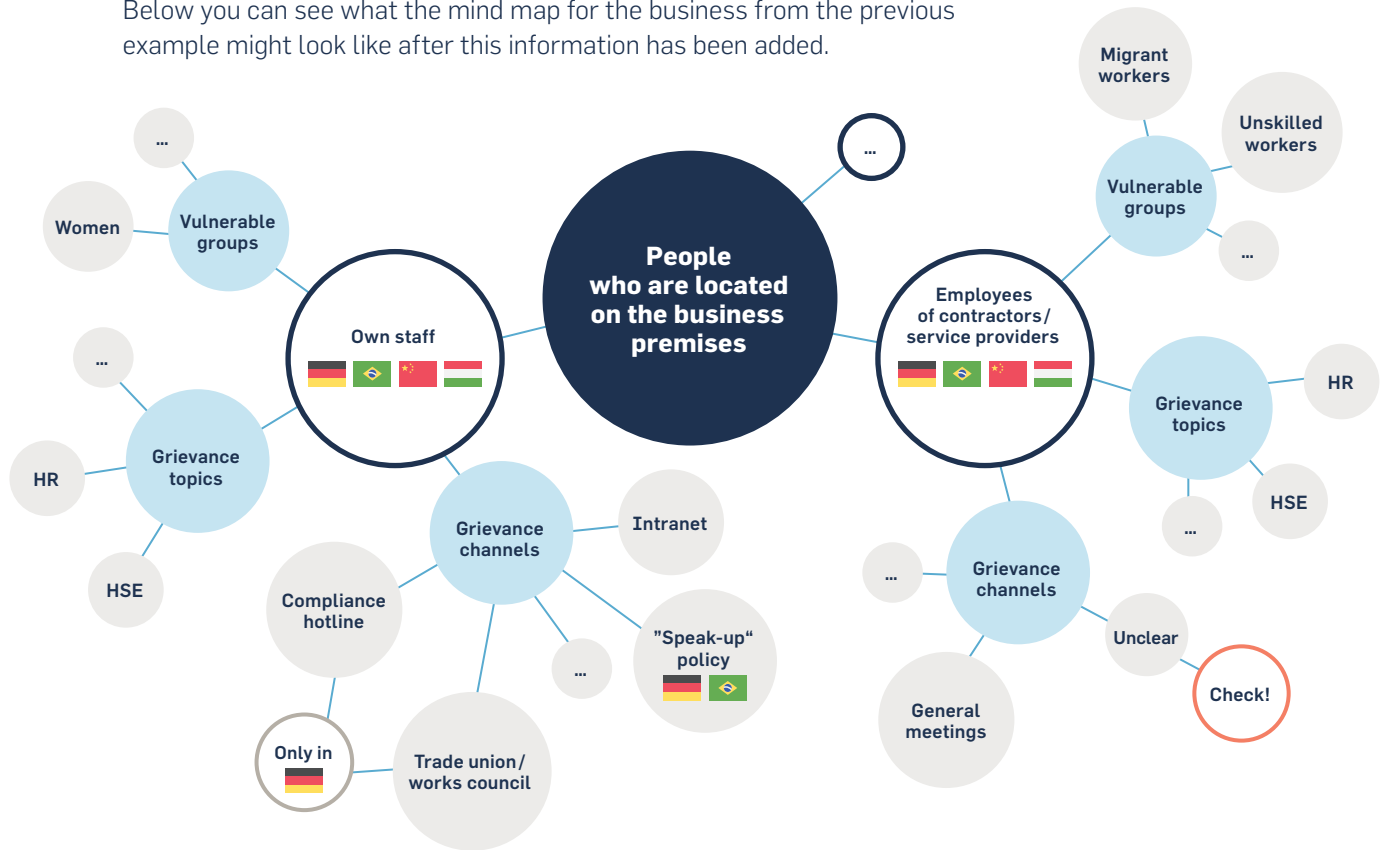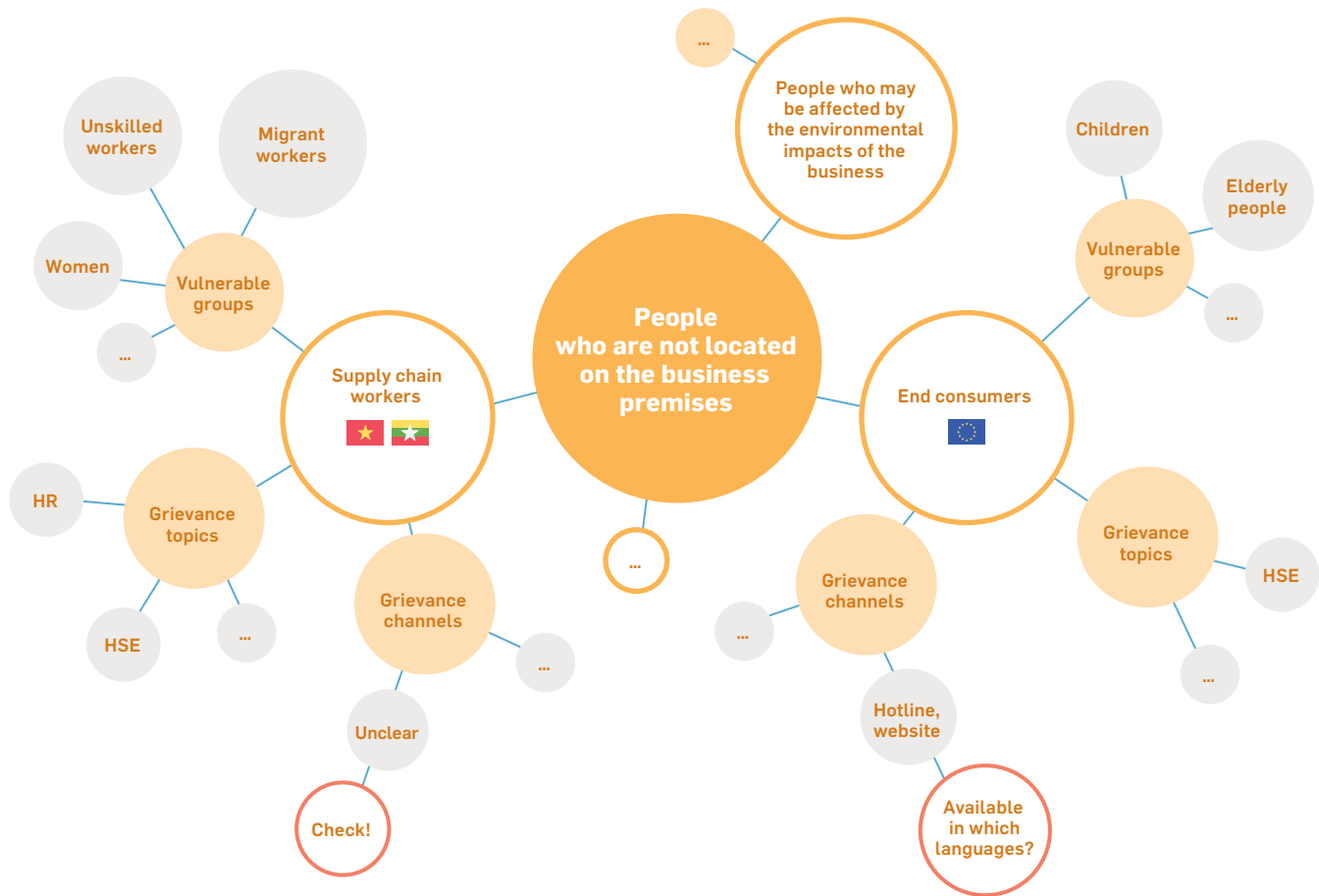| Grievance topics	Groups that might raise a grievance
HR issues (working hours, pay, discrimination, harassment)	Company employees, external staff, employees of suppliers and business partners
Health and safety (slips and falls / occupational safety / building safety)	Company employees, external staff, employees of suppliers and business partners, visitors
Environment (hazardous substances, noise / light / odour problems, impacts on waterways, seas and land)	Neighbouring communities, general public
Product impacts	Company employees, consumers, general public
…	…

1.5 MAPPING EXISTING GRIEVANCE CHANNELS

Task: In a next step, you need to add the ways in which the groups identified can currently contact your business about concerns they may have. You can use the examples on the right as a starting point to complete your mind map. This step will help you identify any key gaps in your current approach.

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**

Below you can see what the mind map for the business from the previous example might look like after this information has been added.

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People who may be affected by the environmental impacts of the business

Unskilled workers

Migrant workers

Women

Vulnerable groups

...

Children

Elderly people

Vulnerable groups

...

Supply chain workers

People who are not located on the business premises

End consumers

HR

Grievance topics

HSE

...

Grievance channels

...

...

Grievance channels

Grievance topics

HSE

...

Unclear

Hotline, website

Check!

Available in which languages?

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1.6 DEFINING
NEXT STEPS

Task: Take a look at your final mind map and reflect on your findings. Are there any obvious gaps? Where do you think might be room for improvement? The following questions can help you identify the next steps you need to take:

›   Do all relevant groups have a channel through which they can communicate grievances?

›   Do the channels adequately cover the potentially relevant grievance themes?

›   Are the approaches adapted to the relevant groups' geographical location and their typical means of communication?

You're probably surprised by how many different groups of people there are that can be affected by your company and might raise grievances with you. Therefore, when planning next steps, bear in mind the following principles:

› **No "one size fits all" but "fit for purpose":** As mentioned at the start, there's no expectation that you set up equally complex and comprehensive grievance mechanisms for all potential user groups. Instead, the UNGPs expect that you establish appropriate and differentiated grievance channels that are suitable for the different groups. Grievance mechanisms must be fit for purpose, that is, aligned with the relevant objective and the needs of the target group.

› **Step by step, not all in one go:** The UNGPs recognise that companies might have limited resources available and cannot immediately close all gaps. What is important, however, is to set out a clear roadmap and implement initial measures as part of a risk-based approach. "Risk" in this context does not mean the financial risk to the company but the risk of negative impacts on their human rights for those affected.

› **Adapt existing mechanisms before setting up new ones:** According to international and national requirements, it's appropriate to plan in a resource-efficient way by first reviewing existing grievance mechanisms for their effectiveness and, if necessary, adapting them. New mechanisms should only be developed if identified gaps can't be closed by strengthening existing ones.

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CHAPTER 2: ADAPT

Reviewing and improving effectiveness

In the first chapter of this guide you developed a mind map to identify the grievance mechanisms that already exist in your company. You can now select one of the channels and review its effectiveness. The most established or central grievance mechanism in your company is a good starting point. This is usually a grievances hotline or central contact point, for example for employees. This chapter will explain how you can review the effectiveness of the selected grievance channel. You can then repeat this process with other channels.

The analysis described in this chapter is based on the human rights effectiveness criteria of the UNGPs. It focuses on the following guiding questions:

› How can the effectiveness of existing mechanisms be assessed?

› Why and how should you pay particular attention to reviewing the accessibility of a grievance mechanism?

› What does the typical process of a human rights grievance mechanism look like?

› What approaches have other companies taken to set up human rights grievance mechanisms and implement effectiveness criteria?

› What should SMEs and other companies with limited capacities pay special attention to?

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2.1 REVIEWING
EFFECTIVENESS

The UNGPs define eight effectiveness criteria that human rights grievance mechanisms operated by companies are expected to meet. According to these criteria, a grievance mechanism is effective if it's legitimate, accessible, predictable, equitable, transparent, rights-compatible and dialogue-based and represents a source of continuous learning for the company. In other words, **an effective grievance mechanism is designed in such a way that it encourages and empowers people to submit grievances even before any human rights have been violated**.

Experience shows that a good mechanism often results in an initial increase in grievance numbers. They typically decrease after a while, provided the process for handling grievances is effective (or improves), problems are addressed systematically and out-of-scope grievances are identified more quickly.

Many companies are concerned that this will create additional workload and that they will have to adapt to various legal requirements and international standards when carrying out human rights due diligence. As far as human rights grievance mechanisms are concerned, this worry is unfounded. National Action Plans on business and human rights, for instance, tend to closely follow the requirements set out in the UNGPs with regard to operational-level grievance mechanisms.

EFFECTIVENESS CRITERIA FOR HUMAN RIGHTS GRIEVANCE MECHANISMS

Dialogue-based: Dialogue as a means of addressing and resolving grievances.

LEGITIMATE

They enable the trust of the stakeholder groups for whom they are intended and are accountable for the fair conduct of grievance processes.

TRANSPARENT

They keep the parties to a grievance informed about progress and provide sufficient information about the performance of the grievance mechanism.

PREDICTABLE

They ensure a clear and known process with an indicative timeframe for each stage of the process and clear information on available types of procedures and outcomes.

ACCESSIBLE

They are known and accessible to all potential users and offer adequate support to those who may face barriers to access.

RIGHTS-COMPATIBLE

They ensure that the outcomes and remedies comply with internationally recognised human rights.

EQUITABLE

Users have reasonable access to information, advice and expertise so that they can participate in a grievance process in a fair, informed and respectful way.

A source of continuous learning: Process is continuously improved on the basis of experiences and in order to prevent future grievances and harm.

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The following overview translates the eight effectiveness criteria into questions that you can use to check whether your existing grievance mechanisms meet the requirements of the UNGPs.

Task: At the end of Chapter 1, you chose an existing grievance mechanism from your business. Now answer the following questions for this particular mechanism.

IMPLEMENT EFFECTIVENESS CRITERIA

Effectiveness criteria	Process requirements	Yes / No If yes, how?
LEGITIMATE	1. Has a clear process been set up that describes the approach to handling grievances?	YES NO
	2. Have clear responsibilities been established and have the employees responsible for handling incoming grievances been appropriately trained?	YES NO
	3. Is there a clear statement that the people who submit a grievance will not be disadvantaged or punished as a result and is compliance being monitored?	YES NO
	4. Is there a mechanism to protect personal data during the grievance process?	YES NO
ACCESSIBLE	5. Are potential users aware of the process and are they able to use it?	YES NO
PREDICTABLE	6. Have the grievance process, its timelines and potential approaches to finding a solution been developed in advance and communicated to potential users?	YES NO

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EQUITABLE	7.	Is the necessary support being provided so that potential users can actually use the mechanism?	YES NO
TRANSPARENT	8.	Are users kept informed of the progress of the procedure?	YES NO
	9.	Is effectiveness of the mechanism being reviewed and communicated internally and externally?	YES NO
RIGHTS-COMPATIBLE	10.	Are particularly serious grievances escalated and prioritised?	YES NO
	11.	Are solutions and corrective measures developed in line with the needs of the people affected?	YES NO
SOURCE OF CONTINU-OUS LEARNING	12.	Are the experiences from operating the mechanism being used to improve its functioning over time and to adapt other relevant management processes?	YES NO
BASED ON ENGAGEMENT AND DIALOGUE	13.	Are potential users involved in the development and performance measurement of the mechanism?	YES NO
	14.	Are grievance processes using dialogue-based approaches?	YES NO

Source: Selection from: CSR Europe, "MOC-A Assessment Tool" (2013) p. 29. The tool also contains examples of implementation of all effectiveness criteria.

GO ONE STEP FURTHER: If you are interested in a more comprehensive review of your existing grievance mechanisms, we recommend the **MOC-A Checklist Tool for effective grievance mechanisms**, which was developed by CSR Europe in 2013 and updated in 2018. The checklist translates the eight effectiveness criteria into 21 process requirements, which are supplemented with examples from corporate practice and recommendations for "ideal scenarios".

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2.2 REVIEWING ACCESSIBILITY

Naturally, all eight effectiveness criteria are equally important for developing effective grievance mechanisms. But practice has shown that making the grievance mechanism accessible to different user groups can be a particularly important challenge. If grievance mechanisms aren't known and accessible to those intended to use them, they fail to serve their purpose.

Task: Look at the mind map you created in which you listed the potential user groups for grievance mechanisms. Think about the barriers to access that different groups might face when using the grievance mechanism you're examining, and about how you could address these. The following overview presents typical examples of barriers to access and ways of improving the accessibility of mechanisms.

Typical barriers to access

› Lack of awareness of the existence of the mechanism

› Language

› (Functional) illiteracy

› Cost

› People's physical location

› Fear of retaliation / negative consequences
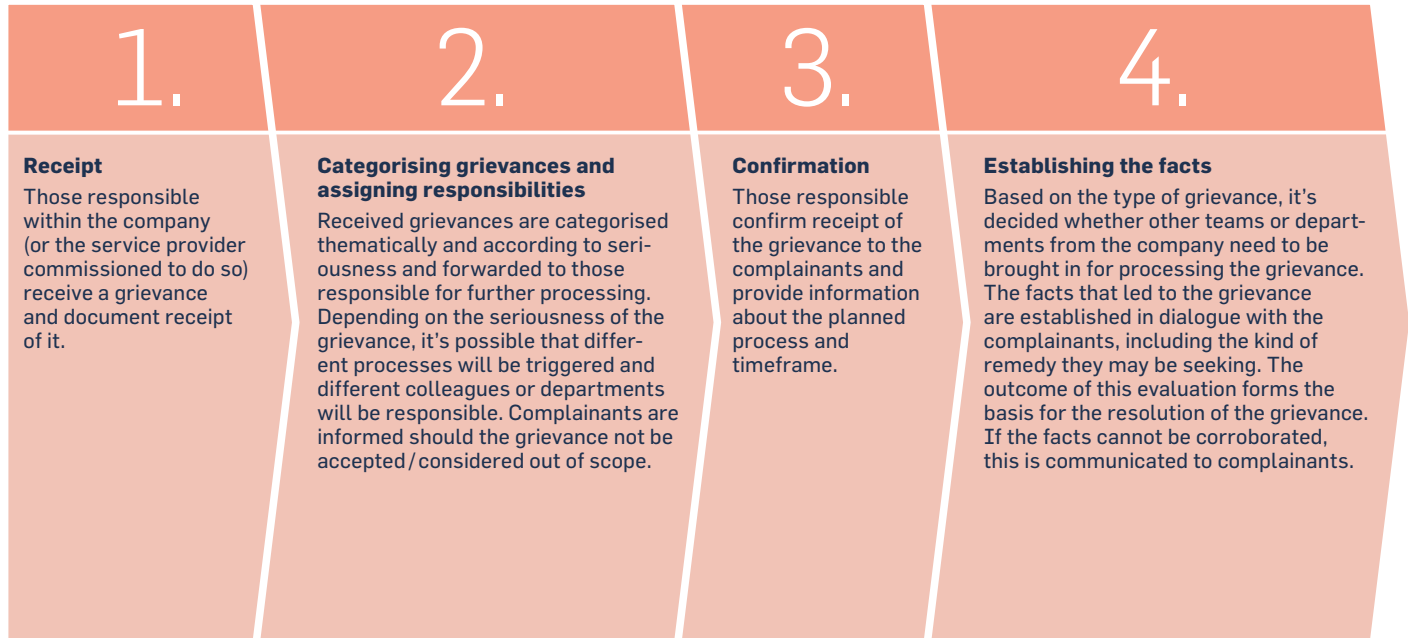
› Lack of trust in the mechanism

Potential measures

You can improve access for employees, contract and supply chain workers, communities or consumers (including vulnerable groups) by considering the following measures (non-exhaustive overview):

› Contact details for the mechanism included on business cards of on-site quality control officers or auditors

› Simple, illustrated posters informing about the grievance procedure in relevant languages that can be displayed at company or supplier sites

› Short brochure (e.g. including pictograms) that shows how a grievance can be submitted and how it's dealt with

› Simple grievance forms that can be put into a complaints box accessible in a protected location

› Public meetings and discussions with relevant stakeholders

› Workshops for the company's own employees or those of suppliers

› Training for the company's procurement staff and/or suppliers on the importance of local grievance mechanisms

› Printing numbers for complaints hotlines or contact details for ombudsmen on products

› ... etc.

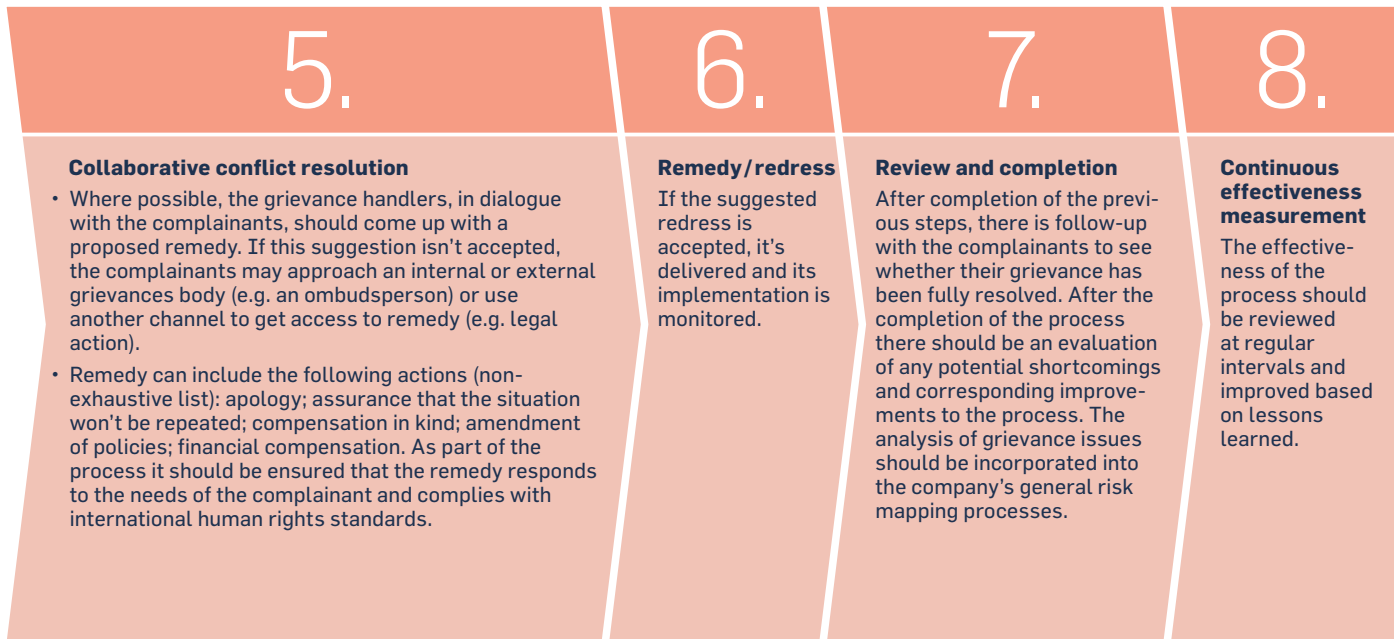INTRO

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2.3 TYPICAL GRIEVANCE PROCESS

Ensuring accessibility of a grievance mechanism is not only a matter of removing barriers to access. Potential users must also know (or be able to access information) about the grievance handling process.

1.

Receipt

Those responsible within the company (or the service provider commissioned to do so) receive a grievance and document receipt of it.

2.

Categorising grievances and assigning responsibilities

Received grievances are categorised thematically and according to seriousness and forwarded to those responsible for further processing. Depending on the seriousness of the grievance, it's possible that different processes will be triggered and different colleagues or departments will be responsible. Complainants are informed should the grievance not be accepted / considered out of scope.

3.

Confirmation

Those responsible confirm receipt of the grievance to the complainants and provide information about the planned process and timeframe.

4.

Establishing the facts

Based on the type of grievance, it's decided whether other teams or departments from the company need to be brought in for processing the grievance. The facts that led to the grievance are established in dialogue with the complainants, including the kind of remedy they may be seeking. The outcome of this evaluation forms the basis for the resolution of the grievance. If the facts cannot be corroborated, this is communicated to complainants.

Task: The following flowchart represents a typical human rights grievance handling procedure.
Take a sheet of paper and sketch the procedure of the grievance process that you've just reviewed.

At what points do the processes differ? When including the results of the effectiveness test in your considerations, do you see any opportunities for improvement?

5.

Collaborative conflict resolution
- Where possible, the grievance handlers, in dialogue with the complainants, should come up with a proposed remedy. If this suggestion isn't accepted, the complainants may approach an internal or external grievances body (e.g. an ombudsperson) or use another channel to get access to remedy (e.g. legal action).
- Remedy can include the following actions (non-exhaustive list): apology; assurance that the situation won't be repeated; compensation in kind; amendment of policies; financial compensation. As part of the process it should be ensured that the remedy responds to the needs of the complainant and complies with international human rights standards.

6.

Remedy/redress
If the suggested redress is accepted, it's delivered and its implementation is monitored.

7.

Review and completion
After completion of the previous steps, there is follow-up with the complainants to see whether their grievance has been fully resolved. After the completion of the process there should be an evaluation of any potential shortcomings and corresponding improvements to the process. The analysis of grievance issues should be incorporated into the company's general risk mapping processes.

8.

Continuous effectiveness measurement
The effectiveness of the process should be reviewed at regular intervals and improved based on lessons learned.

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2.4 LEARNING FROM OTHERS

The following practical examples are intended to show you how other businesses have developed fit-for-purpose mechanisms for human rights-related grievances and complaints.[4]

A **GLOBAL ELECTRONICS MANUFACTURER** offers first- and second-tier supply chain workers multiple grievance mechanisms: complaints can be submitted to the manufacturer via hotlines, email, online or telephone. The company publishes the number of grievances it receives from its suppliers in connection with human rights infringements. These include grievances about managers, wages, welfare benefits, working hours etc.

In designing its grievance mechanism, a **GLOBAL LOGISTICS PROVIDER**, that mainly works with self-employed couriers was faced with the challenge that its couriers are usually working by themselves. In order to better understand their needs and possible concerns, 12 focus group discussions were held with a total of 90 couriers. In the course of these meetings, the most important grievance themes were identified and, building on this, a grievance system was developed that provides for various communications channels. The company set up an online platform for grievances, a grievance panel within the operational part of the business and an independent whistleblower hotline. An independent ombudsperson was appointed. The establishment of these new complaints channels was communicated to all couriers in a personal letter. The couriers are also informed of the decisions taken by the new grievance bodies on a monthly basis.

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4   The selection is intended to offer you considerations that might be helpful in developing your own approach. It doesn't represent an exhaustive evaluation of the company examples.

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A **GERMAN REFINERY** has a clear protocol for dealing with grievances from its local community. Five common grievance themes were defined (e.g. noise and odour), clear responsibilities and a timeframe for grievance handling were laid out and a timeframe for processing the grievances and communicating outcomes to complainants were defined. Grievances generally come in via the phone hotline, which is displayed prominently on the website and in brochures and thus can be easily found by any visitor. The grievances are recorded using specially developed checklists intended to ensure that all necessary information for processing the grievance is logged. The internal investigation of the grievance follows a defined procedure. The outcome of the investigation is, to the extent possible, shared with the complainant by telephone in a timely manner.

A **GLOBAL FOOD COMPANY** worked with the technology startup Ulula to set up a feedback system for workers in the palm oil sector in Indonesia using simple mobile phone technologies (e.g. relying on text and voice messages). To reduce barriers to access for plantation workers, an automated voice message system in the local language was developed. The workers could use the system to submit grievances and complete a short survey on their working conditions. The company worked with Ulula and local partners to roll out the system on participating plantations. It's used as an early warning system for working conditions on-site and helps to monitor compliance with local labour law requirements. Special precautions were taken to ensure the security of the system and of the complainants.

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A **GLOBALLY CHEMICALS COMPANY** has established "neighbourhood forums" at its major production sites. They are aimed at long-term, continuous dialogue and bring together management teams of the various sites and members of the local communities. There are regular meetings at which current issues of shared interest are discussed. The neighbour-hood forums are intended to promote an open and candid dialogue between citizens and site managers. The aim is to enhance and facilitate community participation and engagement, while also enabling the company to respond more effectively to local expectations and complaints.

A **GLOBAL SOCIAL MEDIA PLATFORM** provides information about typical human rights infringements that could take place on its website to its users. As part of this, the company explains in accessible language how grievances about problematic content (e.g. hate speech, violence, sexual harassment) can be reported to the company and provides advice on how to deal with harassment on the platform. The informa-tion also includes reference to the protection of complainants' privacy. For particularly high-risk matters, e.g. posts that suggest a connection with human trafficking, the company provides telephone numbers of law enforcement agencies and specialist institutions.

2.5 CONSIDERATIONS FOR SMEs

The UNGPs expectations with regard to human rights grievance mechanisms are not limited to large and multinational corporations, but also extend to small and medium-sized companies. By the same token, similar principles and considerations with regard to setting up and operating grievance mechanisms are also applicable to SMEs:

› **No "one size fits all" but "fit for purpose":** This also means that grievance mechanisms should correspond to the structures and capacities of the business in terms of complexity and processes. Thus, an SME's human rights grievance mechanism will likely be less complex and expensive than that of a global corporation.

› **Step by step, not all in one go:** This principle can help SMEs develop a prioritised action plan appropriate to their human and other resources.

› **Adapt existing mechanisms before setting up new ones:** SMEs can adapt the grievance and communication channels that are already in place – for example with regard to receiving customer and staff feedback – even if these might be more informal in nature.

› **As information channels, grievance mechanisms have an important added value for a company's activity:** In the introduction to this guide, we presented the advantages that grievance mechanisms can offer companies. These also apply to SMEs.

› **Third-party solutions are possible:** SMEs in particular can consider third-party solutions for managing human rights grievances. "Third-party solutions" include, for example, grievance processes operated by trade associations and industry initiatives that allow SMEs to pool the required financial and other resources.

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CHAPTER 3: ENHANCE

Continuously strengthening grievance management

Continuous improvement is a core feature of human rights due diligence. The human rights approach also demands a risk-based perspective, i.e. taking the actual or potential severity of a human rights impact as a starting point and systematically strengthening, developing and improving processes. Grievance management is a similar matter.

The third chapter of this guide is about how you can continuously strengthen your grievance management over time and adjust your grievance mechanisms to the diverse potential users. The following themes will guide you through this chapter.

› Features of an advanced grievance system

› Systematic engagement of stakeholders

› Developing an approach for remedy

› Developing key performance indicators and establishing information management

› Supporting business partners and suppliers

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3.1 FEATURES OF AN
ADVANCED GRIEVANCE SYSTEM

The Human Rights Capacity Diagnostic (HRCD) Tool is available to you on the human rights information hub mr-sorgfalt.de. The HRCD is a self-assessment instrument that you can use to evaluate and improve your business' management capacity when it comes to implementing human rights due diligence. The HRCD defines the following criteria to characterise an advanced grievance mechanism:[5]

5   The following criteria are a selection of those that the HRCD uses to assess the level of maturity of a human rights grievance mechanism. They correspond roughly to level 3, "efficient management" of the HRCD. Businesses that want to go further can use the criteria for levels 4 – 5 of the HRCD as guidance.

> ❯ There are confidential grievance mechanisms for employees and important external stakeholders (e.g. consumers, local communities, supply chain workers) that are able to deal with a wide range of grievances, not necessarily only to do with human rights specifically. There are checks on whether these mechanisms adequately cover the essential human rights issues relevant to the company. Suppliers and other business partners are asked to set up their own grievance mechanisms.

> ❯ To ensure that rightsholders have access to effective redress and remedy, existing processes are tested and adapted if the risk profile changes or there are lessons to be drawn from investigations into risks and impacts. Barriers to access are identified and the company tests new approaches for removing them.

> ❯ Complainants are actively engaged during the grievance process. Data from grievance mechanisms is analysed in order to identify patterns that point to systemic problems, and appropriate amendments to existing systems are implemented (e.g. for better prevention of corruption or discrimination).

RISK-BASED APPROACH

You should also choose a "risk-based" approach when developing grievance mechanisms. You should start reviewing your existing grievance mechanisms in those areas where you have identified the most important human rights risks and adapt procedures as necessary.

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If you'd like to further develop your grievance management system, you need to adapt your grievance mechanisms to your company's "eco-system" of potential complainants and complaints. For instance, if your company has a central grievance mechanism, this will mean that additional grievance access points will likely need to be created and / or adapted for different user groups in a way that is tailored to their specific needs. As information channels, such mechanisms also help your company's internal risk management and risk prevention processes, as we've already described in the introduction to this guide.

What's important is that people who could be negatively affected are given a realistic chance to gain access to remedy. We've shown the range of possibilities in the overview in Chapter 1.

The following flowchart illustrates an example of an advanced grievance system. The grievance system shown contains several different options by which a grievance can be communicated or received. The different options are tailored to the needs of the respective user groups. In addition, there are also multiple ways for responding to incoming grievances. It's not necessarily required for all grievances to be administered at a single coordination point, as shown in the graphic. However, it makes sense to centrally gather and systematically evaluate grievance information. For grievance matters to be able to effectively feed into risk management systems, relevant information has to be collated. It's up to your company to decide on the form in which this takes place.

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FEATURES OF AN ADVANCED GRIEVANCE SYSTEM

3.
RESOLVING

| Internal Ombudsman | Internal compliance investigation | HR processes | Third party mechanism |

2.
INSTRUCTION TO RESOLVE GRIEVANCE

COORDINATING UNIT

4.
MONITORING OF GRIEVANCES AND SOLUTIONS

1.
RECEIVING

| HR manager | Phone hotline | Audits | Open-door policy | Stakeholder engagement |

Source: Based on: Shift, "Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights" (New York, 2014), p.8.

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3.2 SYSTEMATIC ENGAGEMENT OF STAKEHOLDERS

One important requirement for human rights grievance mechanisms is regular dialogue with their users – i.e. those potentially affected by a company's activities. This is a challenge for many companies. But it's also crucial, in that it helps ensure mechanisms are accessible and known to, as well as trusted by, those that are intended to use it. The simplest way to understand the needs of the of potential users is to enter into dialogue with the affected groups or their representatives.

The following are arguments in favour of including stakeholders in the continuous improvement of your grievance system:

> **Avoiding inefficiencies and building trust:** Constructive stakeholder engagement helps you to get to know the groups and avoid inefficiencies by understanding and addressing their needs. This way, you can also build (and maintain) trust in the mechanism. For instance, some mechanisms, such as hotlines, might only be accessible for some potentially affected groups, e.g. direct employees or customers, but not others. In some cultures there are lower levels of trust in anonymous grievance processes and greater fear of retaliation. Some people might feel more comfortable communicating their grievance personally, rather than using a hotline or a grievance letterbox. It's important to be aware of such needs and characteristics and understand the implications for grievance management.

> **Improving accessibility:** Involving potential users in the development of a grievance mechanism helps you ensure that affected groups are informed of the existence of the mechanism and know how it works, as well as ensuring that the process itself is adequate. This also increases the probability that the mechanism will actually be used.

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> › **Reducing the number of grievances:** Many contact requests aren't actual grievances but low-threshold issues that can be addressed through regular, informal dialogue between your company and the affected parties. Many larger companies (that have specific impacts on communities) have their own staff responsible for maintaining the relationship with such communities. But if the grievance mechanism is the only way to get in contact with the company, all issues have to be escalated into a formal grievance.

> › **Ensure effectiveness:** The effectiveness of the grievance mechanism can also be assessed in dialogue with affected parties. This dialogue can enable the potential users to submit their feedback on whether the grievance mechanism is set up in an accessible, legitimate and fair way.

IMPORTANT STAKEHOLDER GROUPS TO CONSIDER

In many cases, NGOs and other civil society organisations support companies to set up grievance mechanisms, to respond to grievances and to implement redress procedures. Cooperation with such organisations can be helpful because they are often in direct contact with those affected.

Trade unions and other workers' representative bodies should also be included in the development of your grievance mechanism. They often already provide channels through which workers can raise issues with management, and they know the needs of your potential complainants. Through dialogue with these groups, you can avoid unnecessary duplications or inefficiencies.

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3.3 DEVELOPING AN APPROACH TO REMEDY

If there are human rights impacts that your company has caused or contributed to, your company must provide remedy or help to do so. A good grievance management system therefore also includes consideration of how redress can be provided in different grievance scenarios, and of what types of remedy are already available within the company. Here too, you don't have to start with a blank sheet of paper. Hold discussions with your HR and legal departments about the options for redress that are already established within the company. Then, close any remaining gaps.

If you've identified any particularly serious grievance issues (e.g. cases of modern slavery or child labour), it's important to enter into contact with organisations (victim support and protection agencies, relevant state authorities, NGOs) that can provide appropriate support to those affected. You should identify such organisations early on in order to be able to act swiftly when necessary.

Remedy can take many forms. Complainants aren't always concerned with financial compensation. Remedy could also mean an apology, non-financial compensation, preventative measures that ensure there are no repeat cases or any other measures that you and the affected person can agree on as an appropriate response.[6] If the grievance is about, for example, the unfair dismissal of a worker, offering them their job back could be an appropriate form of redress.

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6   EU Commission, "My business and human rights: A guide to human rights for small and medium-sized enterprises" (2012), p.10.

> What's important is to focus on the perspective of those affected when deciding on and providing remedy. The key question that arises is: **Does the remedy offered meet the actual need of the person affected?**

Essentially, the type of remedy chosen should be determined by the level of severity of the impact.[7] Examples of different levels of severity include:

> › **High severity impacts** are catastrophic or irreparable reductions in quality of life, such as death or terminal illness or the most severe forms of child labour or forced labour.

> › **Medium severity impacts** are those that have a substantial effect on an individual's quality of life but can be remedied with a certain amount of effort and expense. These include, for example, substantial but curable illnesses and injuries, discrimination and bullying, infringement of freedom of association, infringement of the right to private life or lasting and excessive overtime work.

7   Detailed instruction for determining the level of seriousness of impacts according to human rights principles can be found in the toolbox for human rights impact assessments created by the Danish Institute for Human Rights in the chapter "Analysing Impacts", p. 9.

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3.4 DEVELOPING KPIs AND INFORMATION MANAGEMENT

As discussed in the introduction to this guide, grievance mechanisms can also serve as **early warning systems** for incipient risks to the business (operational, legal, reputational, etc.). They can make a decisive contribution to proactive risk management and build the foundations for an active learning culture. For this to happen, grievance mechanisms must facilitate the systematic analysis of grievance data that is generated in order to recognise trends and patterns that are relevant to the business as a whole.

Most importantly, the development of an **"error culture"** will facilitate the recognition of problems and the identification of potentials for improvements. To do this, relevant employees should be trained in dealing with and analysing the data generated by the grievance mechanisms. For example, those responsible for a particular grievance mechanism (e.g. HR helpdesk) can be encouraged to identify recurring issues (e.g. unequal pay for men and women) and to proactively contribute suggestions for improvements.

Employees who are responsible for receiving and handling grievances should be trained to recognise any possible legal implications and, where necessary, forward these to the legal department.

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It's important that when grievances are received through different channels, they are not dealt with in isolation. One option could be **to swap those responsible for different grievances channels in regular intervals**, which might help you identify trends and patterns that could otherwise be overlooked. This means you can get to work on any improvements in an integrated and effective manner.

Developing relevant KPIs can also be instrumental in identifying trends in terms of grievances and in creating a solid **basis for continuous improvement.** The following list is intended as inspiration for defining, measuring and reviewing your own KPIs. It's only a small selection of possible approaches. Here, too, the idea is to define KPIs that reflect your own business and key human rights issues. Monitoring relevant KPIs will also make it easier for you to produce progress reports on your human rights due diligence processes.

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).

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

Indicators for measuring the mechanism's effectiveness	Indicators for measuring the impact of the grievance mechanism on overall company performance	Indicators for measuring the mechanism's advantages for the business
• 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).	• 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.	• 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).

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

3.5 SUPPORTING BUSINESS PARTNERS AND SUPPLIERS

Depending on the sector and business structure, the most serious human rights risks and associated grievances at an operational level often occur not directly within the business, but with suppliers and business partners. The expectations regarding companies' human rights due diligence extend along their entire value chain.

Thus, as well as developing mechanisms at company level, prompting your suppliers and business partners to develop their own (and, where possible, supporting them to do so) therefore forms part of good grievance management. Dealing with problems as closely as possible to where they arise may not only be most effective, but often also in the interest of those affected.

To achieve this, firstly you need to communicate your expectations regarding grievance mechanisms to your suppliers. This can be done by making relevant requirements part of your contracts or your code of

practice for suppliers. 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?

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Audits you're already carrying out can also be expanded to include these or similar questions.[9] In addition, you can create incentives for certain suppliers to develop effective grievance mechanisms. This can be particularly worthwhile for long-term business relationships, strategic products or large purchasing volumes, where you have a special interest in continuous improvement on the part of your suppliers and partners.

Where no grievances mechanism currently exists or where conversations with suppliers and business partners or audits reveal that the mechanism is ineffective (e.g. no grievances are being raised, workers do not know or trust it), the supplier should be given support to develop an effective grievance mechanism. In other cases it may be necessary to set up your own mechanism through which the supplier's employees can contact your business

directly if local mechanisms are inadequate and not in a position to provide redress.

In order to make effective use of your available resources, you should always take a risk-based approach. Embedding requirements in e.g. a code of practice for suppliers and reviewing this through monitoring is a helpful first step, which can be strengthened on an ongoing basis through more targeted measures.

9   A comprehensive overview of the questions on the subject of griev-
     ance mechanisms which you could put to your supplier during an audit
     can be found in: Shift Project, "Remediation, Grievance Mechanisms
     and the Corporate Responsibility to Respect Human Rights, Shift
     Workshop Report No. 5, Annex D" (May 2014), p.12 and p.21.

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