Designed with and for workers

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







4th November 2026

BACKGROUND

Process over prescription

Six years of implementing a worker-led approach to grievance mechanisms

9 projects delivered

14 brands engaged directly

20 additional brands and retailers reached indirectly

29 supplier companies supported with hands-on advice

202 supplier companies upskilled through training



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RESULTS

Initiatives' results across three levels

Immediate design-level improvements

Enhanced process quality, dialogue, and relationships

Early signs of longer-term impact



> *"Participation before was difficult because there was no structure. Now there is a structure, and it is easier."*
>
> Worker representative at a participating company

CONTEXT & DRIVERS

Setting the stage: why this matters now

The Operational Compliance Gap

Most global suppliers host formal hotlines and drop-boxes, yet workers rarely use them due to trust deficits.

Regulatory Momentum

Driven by CSDD Directive, German Supply Chain Act, and French Duty of Vigilance Law.

Paradigm Shift

Moving from box-ticking audits to active accountability and worker trust building.

“If nobody complains, how do we know the system works?”

THE BUSINESS PERSPECTIVE

Why effective grievance mechanisms matter

They are part of responsible business conduct—not just a reporting channel.

Identify issues earlier

Worker voice can reveal risks and patterns that audits or formal checks miss.

Resolve and prevent harm

A credible process can support timely, rights-compatible remedy and reduce recurrence.

Build trust and dialogue

Fair handling can strengthen relationships between workers, management and buyers.

Strengthen due diligence

Grievance information can feed into risk assessment, prevention and continuous improvement.

MYTH VS. REALITY

Challenging the “No Complaints” assumption

Complaint volume alone tells us very little about whether a mechanism works.

LOW NUMBERS CAN MEAN...

Few problems are occurring

Workers trust informal resolution

People know the process and feel safe using it

OR THEY CAN MEAN...

Workers do not know where to go

Fear of retaliation or futility

Channels feel inaccessible, biased or unsafe

Ask what sits behind the number—and what happens after someone speaks up.

ROOT CAUSES

What stops workers from speaking up?

Barriers are often connected: a channel can exist without feeling usable or safe.

Fear	Retaliation, job loss, reduced hours or being labelled a troublemaker
Trust	Doubts about confidentiality, impartiality or whether anything will change
Awareness	Unclear rights, procedures, scope or examples of what can be raised
Access	Language, literacy, time, digital access, disability or location
Power & representation	Employer dependence, gender dynamics, weak representation or exclusion

The people facing the greatest risks may be least likely to use a standard channel.

FIELD LESSONS

The gap between policy and reality



Source: caes.ucdavis.edu

Informal Migrant Isolation

Seasonal workers were entirely unaware of available supplier hotline tools.

Power Asymmetry

Dependence on employers for housing restricts standard reporting routes.

Core Takeaway

Co-design processes matter just as much as technical mechanism architecture.

STRATEGIC SHIFT

The process matters as much as the mechanism

Worker participation cannot be a one-off consultation or a taskforce that only meets on paper.

1 Diagnose

Map existing channels, barriers and trusted routes.

→

2 Co-design

Bring workers, representatives and management together.

→

3 Make time

Provide paid time, translation and practical support.

→

4 Keep listening

Review the process with workers and adapt it.

Learn more on how to meaningfully engage with workers through the guidance "Meaningful Stakeholder Engagement" written in partnership by Oxfam, AIM-Progress, amfori, ETI, FLA and FNET.

MECHANISM DESIGN

From channels to a worker - led approach

Reframing grievances

Replace legalistic terminology with approachable phrases like "Speak Up" or "Concerns & Ideas".

Multiple channels

Combine digital messaging, verbal worker reps, and physical suggestion boxes.

A trusted process

Gender safeguards

Incorporate dedicated female intake focal points and gender - sensitive confidentiality protocols.

Transparency

Provide regular worker updates on resolution status without compromising privacy.

Supported by leadership, worker representation, clear procedures and ongoing review

PRACTICAL LESSONS

1. Build on worker voice and social dialogue

STEP 1

Design

Bring workers, representatives and management together.

STEP 2

Implement

Provide paid time, training, information, protection and resources.

STEP 3

Review

Review the process with workers and adapt it.

Worker Participation

> *"Resistance was there. [...] So, time needed to help workers understand what the project was [...] Workers were initially very cautious but changed attitude and started to come forward to be members of the GM committee."*
>
> Worker representative at a participating company

PRACTICAL LESSONS

2. Buyers can enable —or undermine —progress

Supplier capability grows through sustained engagement, not one-off requests or penalty-led compliance.

Set clear expectations

Explain what effective, worker-centred practice looks like.

Provide practical support

Offer adaptable tools, training, advisory support and peer learning.

Back participation

Expect management to make time and resources available for workers.

Follow up constructively

Review progress, remove obstacles and encourage improvement over time.

Ask suppliers about the quality of the process—not just whether a channel exists.

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

PRACTICAL LESSONS

3. Monitor what matters, not just complaint numbers

Use quantitative information alongside worker feedback and evidence of what happens next.

Access & awareness

Do workers know how to raise concerns? Can different groups access the process?

Trust & handling

Do people feel safe? Is the process timely, fair, transparent and predictable?

Outcomes & learning

Are remedies appropriate? Do patterns inform prevention and business decisions?

Track both activity and experience; low volumes are not an effectiveness indicator on their own.

> *People were afraid to use the suggestion boxes but now that they know how to use it and see that actions are taken when they raise concerns, they feel encouraged.*
>
> Supplier company in South Africa

SYSTEMIC ARCHITECTURE

Shared responsibility, different roles

People need options—and pathways between mechanisms—depending on what feels safe and appropriate.

SITE / OPERATIONAL	Resolve local issues close to where they occur
BUYER / SUPPLY CHAIN	Address buyer-related drivers, recurring patterns and leverage
SECTOR / MULTI-STAKEHOLDER	Tackle shared risks and systemic gaps across companies

Effective remedy depends on complementarity between mechanisms.

THE WIDER ECOSYSTEM

From a mechanism to an ecosystem

Aligned with the UNGP Effectiveness criteria

LAYERED GRIEVANCE ECOSYSTEM

Transparency as a foundation for navigation
Clear roles and responsibilities + resources
Clear escalation pathways
Structured information flows
Referral systems between mechanisms

PEOPLE-CENTERED FOUNDATION

Co-designed with rightsholders
Supported by local actors
Build awareness
Accessibility to multiple pathways

The Oxfam America briefing frames grievance mechanisms as pathways within a wider accountability landscape.



KEY TAKEAWAYS

Start with the people who need to use it

1. Process Equals Trust

How a mechanism is established matters just as much as its technical design.

2. Involve Rightsholders

Engage workers and trade unions in co-designing mechanisms from day one.

3. Insight vs. Complaint

Treat grievances as essential intelligence for continuous human rights improvement.

Action Points

Three questions to take back to your organisation:

1. Do affected workers know where they can go?
2. Do they feel safe and trust what happens next?
3. Does the process lead to fair remedy and learning?

Discussion & Q&A

Thank you for joining today's session.

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For workers' rights. For better business.

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