

Remediation and Operational-Level Grievance Mechanisms

What do the UN Guiding Principles Expect?

- ▶ Where a company identifies that it has caused or contributed to negative human rights impacts, it should provide for or cooperate in their remediation through legitimate processes.
- ▶ Companies should establish or participate in effective operational-level grievance mechanisms for stakeholders who may be negatively impacted by their activities, in order that grievances may be addressed early and remediated directly.

Why is this Important?

- Unless a company actively engages in the remediation of impacts it has caused or contributed to, it cannot fully meet its responsibility to respect human rights.
- Negative impacts may occur despite a company's best efforts, given the complexity of operations and business relationships involved.
- Companies need to be prepared for this situation so they can respond quickly and effectively. Strong remediation processes can help prevent impacts from increasing or conflicts from resulting.

What are the Steps Involved?

A Building a Systematic Approach to Remediation

Mapping and Working with External Remediation Processes

B

Designing Effective Operational-Level Grievance Mechanisms

C

Key Points for Implementation

- ▶ Having systems in place to enable remedy shows that the company is able to restore respect for human rights quickly and effectively, should impacts occur.
- ▶ One of the most systematic ways for a company to provide for the remediation of impacts is through an operational-level grievance mechanism.

Possible Approaches

- **Defining “remediation” and “remedy”:** Remediation is the process of providing a remedy for a harm. Remedy can take a variety of different forms, including apologies, restitution, rehabilitation, financial and 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. While some forms of remedy are more likely in a judicial mechanism, many are possible through non-judicial processes as well.

For example, where a worker has been unfairly dismissed, an appropriate remedy may be reinstatement supported by appropriate compensation. In other cases, it may be harder to remediate negative impacts, for instance where physical or life-threatening harm is involved.

Companies should try to understand how those who have been impacted view different remedial options and which they consider to be most effective in their own circumstances. Whenever possible, it will be helpful to discuss this directly with complainants and explore available options. It can be important to ensure a complainant has her own sources of advice, to ensure she feels informed in reaching a view on remedy. In the case of workers, it is important that any such approaches do not undermine the role of legitimate trade unions.

Where no agreement can be found on an acceptable remedy, it will usually be most appropriate for a legitimate, independent mechanism to reach a final decision. This may be through the courts or an administrative proceeding or some other, mutually-agreed process.

- **The extent and limits of a company’s responsibility to remediate:** When an E&R agency has caused or contributed to a harm, it has a responsibility to cease its contribution and provide or contribute to a remedy. This can be through judicial processes or through non-judicial processes that are generally considered to be “legitimate”, including, for example, providing a fair and independent process, being accountable, and producing outcomes that are consistent with human rights. Remedy may also be provided through an “operational-level grievance mechanism” provided by the company, or which the company participates in (see [Section VI-C](#) below).

E&R agencies do not have to remediate:

- (a) Impacts they have neither caused nor contributed to: it is the responsibility of those who have contributed to the impacts to provide for or cooperate in their remediation. However, where the impacts are nevertheless linked to the agency’s operations, it has a responsibility to use its leverage to prevent or mitigate the risk of the impacts continuing or recurring (see [Section III-D](#) above);
- (b) Impacts they are alleged to have caused or contributed to, where the agency does not agree with that allegation. However, the company may need to investigate the issue to be sure of its position and should avoid obstructing legitimate processes to investigate and adjudicate the issue, through the courts or administrative proceedings.

This said, E&R agencies will want to pay careful attention to whether they might in some way have contributed to impacts by others in their value chain. This could include:

- Pressuring a partner E&R agency to identify candidates for recruitment on terms that incentivise inadequate due diligence or “short-cuts” by the partner agency;
- Agreeing to provide agency workers to a user enterprise that is intending to replace legally striking workers or to otherwise limit or undermine its own workers’ freedom of association.
- **The rationale for a systematic approach to remediation:** Much of an E&R agency’s efforts regarding human rights will focus on preventing negative impacts from happening. But even with the best policies and processes in place, things can go wrong, for instance because:
 - An individual makes a mistake;
 - Unforeseen issues arise for which the company is not prepared;
 - A client company or user enterprise abuses the human rights of workers that the E&R agency has recruited or placed in employment;
 - A partner E&R agency takes advantage of vulnerable or marginalised workers that it is recruiting;
 - Stakeholder expectations change and previously agreed approaches are challenged.

Past or current impacts may come to a company’s attention through its on-going assessment processes as part of its human rights due diligence (see [Section II](#)). They may also become apparent through other channels, such as:

- Stakeholder engagement processes;
- Observations of staff on the ground;
- Feedback from other groups or organisations working with affected stakeholders (eg NGOs, trade unions);
- Academic researchers;
- Media reports.

E&R agencies need to have clear processes in place to respond, often rapidly, to situations where human rights impacts occur or are alleged to have occurred. Otherwise, they may find themselves taking unconsidered, untested approaches to situations in which individuals’ safety may be at risk. This may result in negative human rights impacts being created or increased.

Remedies may be provided through various processes, including through negotiations with legitimate trade unions or other worker representatives; or through action plans to address problems found through review processes. Remedies may also be provided through operational-level grievance mechanisms.

- **The role of operational-level grievance mechanisms:** An operational-level grievance mechanism is a formalised means for affected stakeholders to raise concerns about any impact they believe a company has had on them in order to seek remedy. The mechanism should help to identify problems early, before they escalate, and provide solutions that include remedy for anyone impacted.

In the case of workers represented by trade unions, industrial relations processes involving management and those unions are themselves a form of operational-level grievance mechanism.

An effective operational-level grievance mechanism can support the due diligence process and help embed respect for human rights across the E&R agency, particularly by:

- Promoting internal discussions about impacts and how to address them – the process of designing the mechanism may already contribute to these discussions;
- Helping identify impacts and understand them from the perspective of workers or other affected stakeholders – this can directly contribute to the company’s impact assessment processes;
- Providing feedback on the perceived effectiveness of company responses to impacts – this can help the company track its performance;
- Demonstrating that the company takes the concerns of affected stakeholders seriously – this can help

build trust and reinforce relationships with affected stakeholders;

- Providing accountability for human rights impacts – this is critical to embedding the company’s commitment to respect human rights;
- Improving the quality of information available to management about impacts, grievances and client/user enterprise relationships – this can help secure management support for the mechanism;
- Illustrating where there may be weaknesses in company policies, procedures or practices – this can contribute to continuous improvement.

As always, companies should respect confidentiality and take steps to prevent retaliation against complainants.

VI B Mapping and Working with External Remediation Processes

Key Points for Implementation

- ▶ Remediation processes provided by the state or third-party institutions can provide alternative channels for affected stakeholders to raise complaints. Complainants should be free to choose which available channels they wish to use.
- ▶ Existing processes may also help shape an operational-level grievance mechanism. They may:
 - Illustrate local stakeholders’ preferred approaches to resolving grievances and defining remedy, which can inform the design of any operational-level mechanisms;
 - Offer a formal point of recourse if an operational-level mechanism cannot achieve an agreed outcome.

Possible Approaches

- **Mapping the landscape of grievance mechanisms:** Operational-level grievance mechanisms are just one channel for addressing complaints that an E&R agency has caused or contributed to negative impacts on people. In most societies there is a range of other mechanisms available. These typically include administrative (such as labour inspectorates) and judicial mechanisms provided by the state. Additional mechanisms may be available where there is a:
 - National Ombudsman with a mandate that covers E&R agencies;
 - National hotline for registering complaints about the practices of E&R agencies;
 - Special body or bodies to address relevant human rights issues such as trafficking or child labour;
 - [National Human Rights Institution](#) that can handle complaints regarding alleged company impacts;
 - National Contact Point that deals with breaches of the [OECD Guidelines for Multinational Enterprises](#).

Where trade unions are not legitimate or do not or cannot represent the whole workforce, other channels may be available, for example through local labour offices or nationally-recognised labour dispute resolution organisations.

Mapping the landscape of grievance mechanisms includes understanding how effective those mechanisms are seen to be in practice (for example, if courts are generally viewed as corrupt). This helps a company understand how an operational-level grievance mechanism might be positioned to add value and avoid undermining existing state-based processes.

- **Interacting with state-based and other external grievance mechanisms:** Complainants may choose to seek remedy for an alleged impact through the court system or an administrative proceeding, rather than approaching the company directly. A company has the right to contest allegations it believes are unfounded or inaccurate. In contexts where the courts are seen as weak or even corrupt, it may be helpful for the company to try to demonstrate that it is not trying to influence the due legal process while defending its position.

E&R agencies may find it useful to build recourse to state-based grievance mechanisms into their own processes for handling grievances.

In some cases, an E&R agency may need to refer a complaint to the state authorities, in particular where it raises criminal issues or involves the state or its agents. However, care should be taken in how these complaints are reported, particularly where the rule of law is weak or corruption is strong, because of the risk that complainants may be exposed to retaliation.

- **Access to client company grievance mechanisms:** Where an E&R agency is involved in recruiting candidates as direct hire employees for a client company, the agency will want to confirm that the client company has an effective operational-level grievance mechanism in place, or provides access to such a mechanism for its workforce. The new direct hire employee should have access to the client company's grievance mechanism(s) once they commence employment, just like other members of its workforce. (This is distinct from the E&R agency's own responsibility to track impacts on such workers, discussed in [Section IV-D](#) above.)
- **Access to user enterprise grievance mechanisms:** Where E&R agencies are involved in placing agency workers with user enterprises, the employment relationship will be between the E&R agency and the worker, but the worker will typically be under the supervision of the user enterprise. The E&R agency needs to ensure that agency workers have access to an effective grievance mechanism through the agency itself. However, because the purpose of grievance mechanisms is to address problems as close to their source and as early as possible, E&R agencies will want to engage user enterprises about enabling access by agency workers to their own grievance mechanisms as well.

There may be structural barriers preventing an agency worker from accessing a user enterprise's grievance mechanism, for example because:

- It is only open to full-time or directly hired employees;
- The agency worker lacks awareness of available avenues for complaints (e.g., if they did not receive the same training as directly hired employees on the user enterprise's policies and processes);
- The worker may be concerned about being replaced if they are seen to "cause problems";
- There may be additional barriers for vulnerable or marginalised agency workers to do with language, culture, age and/or fear of jeopardising their immigration status in the case of migrant workers.

These barriers are likely to be compounded where legitimate trade unions or worker representatives are lacking.

Where access to the user enterprise's mechanism(s) does exist, it will be important for the E&R agency to establish a feedback loop about the kinds of complaints received by the user enterprise from the E&R agency's workers and how they are being addressed, in order to inform the E&R agency's own assessment of whether it is meeting its responsibility to respect human rights.

E&R agencies and user enterprises will need to agree between them on who has responsibility for informing agency workers about available grievance mechanisms, including those that are external to any company systems – such as industry mechanisms or mechanisms run by labour directorates or other relevant state agencies.

- **Grievance mechanisms in partner E&R agencies:** It can be productive for E&R agencies to encourage and even assist partner E&R agencies to develop their own grievance mechanisms for workers. This can help reduce the risks of human rights impacts in connection with an agency's own operations. Wherever possible, these mechanisms should involve legitimate trade unions or worker representatives. E&R agencies may still want to consider providing a "fall-back channel" for workers, in case issues are not adequately addressed by the partner agency (see [Section VI-C](#)).

- **Industry association mechanisms:** These can play an important role in supporting grievance mechanisms at the individual E&R agency level – and for smaller E&R agencies, they may be an appropriate channel for directly remedying grievances from the workers those agencies recruit or place.

Some mechanisms provide a complaints-handling function in relation to non-members as well as members. This may be run collaboratively by the association and a trade union or by a trade union alone. Such mechanisms can be a source of important information for relevant state agencies, by helping them understand where to best target their enforcement and other efforts.

Industry mechanisms can play a variety of other roles, for example by:

- Conducting active outreach to agency workers, and potentially to direct hire employees, to inform them about the availability of existing grievance mechanisms;
 - Reviewing the effectiveness of their E&R agency members’ operational-level grievance mechanisms as part of inspections, audits of or certification processes for members, and supporting members in improving such mechanisms;
 - Conducting investigations on their own initiative that may involve representatives from trade unions and relevant state agencies such as a labour inspectorate, a National Human Rights Institution or Ombudsman’s office;
 - Issuing penalties, ranging from written warnings to termination of membership, a request to the state to suspend the offending agency’s license, bringing a representative action (law suit) and/or providing remediation directly to the affected worker;
 - Broader awareness-raising with user enterprises and client companies about the importance of effective grievance mechanisms for workers.
- **Access to grievance mechanisms for migrant workers:** It is particularly important that origin and destination states provide effective grievance mechanisms that migrant workers can access, in line with their duty to protect. This should include appropriate protections for migrant workers who file complaints as well as encouraging migrant workers to use such mechanisms, given their fear that “complaining” may pose a threat to their employment and immigration status. Cooperation between E&R agencies, and between E&R agencies and relevant state authorities in the origin and destination states, will be important, particularly where serious abuses are alleged.

In destination states, relevant approaches can include:

- Nominating a state agency that is responsible for providing an accessible channel for migrant workers’ complaints (i.e., one that takes into account their hours of work, language, preferred means of communication and other relevant issues);
- Liaising with the embassies of migrant workers’ origin states and, for example, encouraging them to host “open houses” for migrant workers on a regular basis;
- Exploring ways of providing migrant workers (particularly those engaged in domestic work) with additional means of communication like mobile

Resources: National Hotlines for Agency Workers

In one EU Member State, the industry association took a leading role in establishing a bipartite run foundation involving employers and trade unions. This foundation’s role includes supporting enforcement of the national sectoral collective bargaining agreement, providing information and reporting on implementation of the agreement. Advice and resources are available in a range of relevant languages online. The foundation takes action in response to complaints and can also conduct its own investigations. If the relevant E&R agency does not address the problem, the foundation will take legal action against the agency, including wage recovery proceedings where these have been withheld from workers. The foundation reports publicly on outcomes of court proceedings and investigations on its website.

phones, which can be pre-programmed to send an SMS message to the relevant state agency and/or a responsible NGO when problems arise;

- Engaging or supporting other organisations (e.g., cultural or religious groups) to conduct outreach to migrant worker communities;
- Working with origin states directly on bilateral arrangements regarding migrant workers, including on access to effective remedy by, for example, enforcing judgments in favour of migrant workers' rights in the origin state.

E&R agencies, along with client companies and user enterprises that rely on migrant workers, will want to proactively engage with relevant state actors to facilitate early and effective responses to migrant workers' concerns.

VI C Designing Effective Operational-Level Grievance Mechanisms

Key Points for Implementation

- ▶ The Guiding Principles state that operational-level grievance mechanisms should be: legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on dialogue and engagement, and a source of continuous learning.
- ▶ While these criteria mostly relate to the quality of the processes they offer, they include an important requirement that outcomes should be consistent with internationally-recognised human rights.
- ▶ Operational-level grievance mechanisms should not preclude access to judicial or other state-based processes, or undermine the role of legitimate trade unions. They should always take steps to prevent retaliation against complainants.

Possible Approaches

- **Building on existing company mechanisms:** An E&R agency may have separate grievance mechanisms for their internal staff and for agency workers they place in employment, or they may have a combined mechanism.

Whatever approach is adopted, grievance mechanisms need to fit an E&R agency's local operating context. It is therefore best to design them close to the level where they will operate wherever possible, and with input from the groups for whom they are intended.

Many E&R agencies will already have whistle-blower or anonymous hotline systems in place that may play an important role in providing avenues for individuals to raise human rights-related complaints. Some are more traditional in that they focus on receiving reports of breaches of the company's Code of Conduct, or of ethical misconduct; others are wider in scope, allowing for a range of complaints about workplace conditions.

- **Building internal support for an operational-level grievance mechanism:** It can be challenging to build internal understanding that complaints raised through an operational-level grievance mechanism should not be seen as a threat. It may be helpful to underline to internal staff the opportunities such mechanisms present for:
 - Receiving useful feedback on how the company is perceived;
 - Continuous improvement where complaints show there are weaknesses in policies, processes or practices;
 - Demonstrating that the company cares about the concerns of affected stakeholders and is committed to addressing them.

Where an E&R agency is designing a new mechanism, it can be useful to make this a collaborative exercise. Involving individuals from key branches or departments/functions across the company – including those whose actions may lead to complaints – can build support for the mechanism. Building in time for this internal engagement, as well as for engagement with affected stakeholders, can be important to the longer-term success of the mechanism.

Where an actual complaint arises, it is often appropriate to involve the branch or department/function whose actions are the subject of the complaint in its investigation, while ensuring that the overall process remains independent. Where it is possible to involve them also in identifying solutions, and “owning” their implementation, this may help contribute to future prevention. At other times, it may not be appropriate for the same individuals to be involved, for example where serious personal allegations are at issue, or where it may otherwise compromise a credible investigation of the complaint. They should nevertheless benefit from lessons learned, in order to prevent repetition.

- **Defining the scope of a mechanism:** It can be counterproductive to limit a grievance mechanism to complaints that name human rights issues or claim particular laws or standards have been breached. This risks missing impacts that could escalate over time into serious human rights risks or impacts. A grievance mechanism should be able to pick up a full range of concerns early enough to avoid their escalation and address underlying issues. For example, complaints about the poor quality of worker canteen food in a user enterprise factory may be a symptom of deeper worker concerns about poor treatment that are harder to articulate.

A mechanism should be able to exclude clearly vexatious complaints. However, it is risky to assume a complaint is vexatious without close attention and investigation. In some cases, complaints that appear vexatious may in fact reflect legitimate issues that the complainant was afraid or unable to raise directly.

Vulnerable or marginalised workers may find it particularly hard to raise complaints. It may be possible to identify specific ways in which they can raise concerns without increasing their vulnerability, including through legitimate trade unions or worker representatives speaking on their behalf. Wherever possible, it will be beneficial also to seek ways to gain their views directly.

- **Escalation of complaints:** An effective mechanism requires triggers for complaints to be escalated within the E&R agency, for example:
 - Where deadlines for responding to a complainant have not been met;
 - Where complaints raise potentially severe human rights impacts;
 - Where a complaint indicates possible criminal conduct;
 - Where a complaint implicates other companies or representatives of the state.

In the latter two instances, it will be important to report the matter to the relevant state authorities, taking into account the issues highlighted in [Section VI-B](#) above.

- **Designing an effective grievance mechanism for workers:** A poorly designed mechanism is often counter-productive: it can raise expectations among stakeholders without delivering on them, even increasing the sense

Example: Grievance Mechanisms at Country and Corporate Levels

One E&R agency has established dedicated channels through which workers and other stakeholders can raise concerns, either through local reporting mechanisms in place at the country/subsidiary level or through the company’s central reporting procedure. The agency employs “Local Integrity Officers” in all country offices/subsidiaries. These may be internal staff members or an external party, as appropriate to the particular situation. The agency has a “Central Integrity Officer” who is appointed by the Board and is responsible for investigating allegations involving management at the country/subsidiary level. The Officer receives periodic reports from the Local Integrity Officers, and submits quarterly reports to the Board. All complaints are treated with appropriate confidentiality and with an assurance of non-retaliation against any employee filing a good faith complaint.

Example: Grievance Mechanisms in Smaller E&R Agencies

All agency workers placed in user enterprises by one small E&R agency are regularly visited by the agency’s internal staff. Any worker who has a concern is encouraged to ask for a personal interview. All workers are advised at the point of recruitment – and consistently reminded through the course of their employment – that they can contact the agency head office directly with complaints and are supplied with email and phone contact details. All complaints are investigated and anonymity is respected in order to protect the worker.

Criteria for Designing Effective Operational-Level Grievance Mechanisms

The Commentary to Guiding Principle 31 describes the key criteria for effective operational-level grievance mechanisms. They should be:

- (a) **Legitimate:** enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;
- (b) **Accessible:** being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers;
- (c) **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;
- (d) **Equitable:** seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;
- (e) **Transparent:** keeping parties informed about progress, and providing sufficient information about the mechanism's performance to build confidence and meet any public interest at stake;
- (f) **Rights-compatible:** ensuring that outcomes and remedies accord with internationally recognised human rights;
- (g) **A source of continuous learning:** drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms;
- (h) **Based on engagement and dialogue:** consulting the stakeholder groups for whose use it is intended on its design and performance, and focusing on dialogue as the means to address and resolve grievances.

The UN OHCHR Interpretive Guide to the Corporate Responsibility to Respect Human Rights further explains these criteria. A report on four pilots conducted while the criteria were being developed illustrates their intent and implementation.

of grievance. It may also distort the company's assessments of how well it is managing human rights risk.

The most appropriate channels for addressing worker complaints are often through discussions between trade unions and the management of the E&R agency, or the client company or user enterprise concerned. Workers should not be discouraged from forming or joining trade unions for these and other purposes.

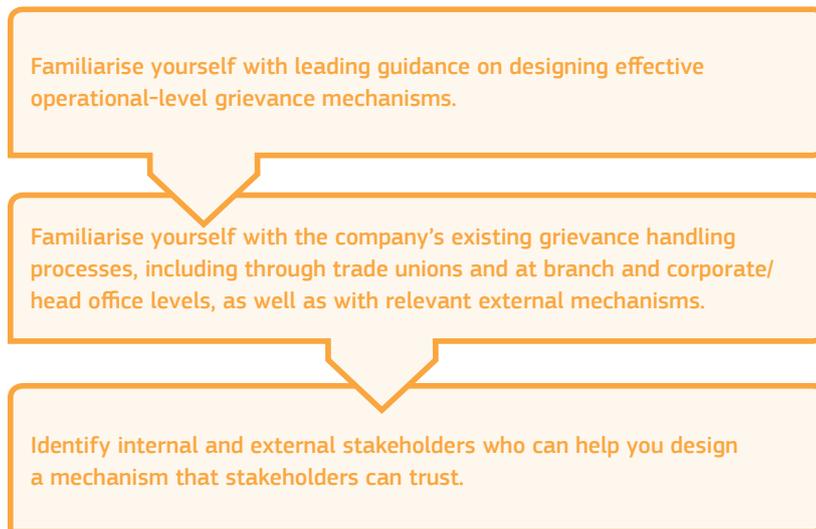
Relevant experience about implementing grievance mechanisms to address the concerns of workers includes:

- It can be beneficial to involve workers in the design, review or even joint oversight of the mechanism, particularly where trust in the company or the mechanism is low. This can help ensure that the individuals for whom the mechanism is intended are willing to use it.
- It is important to provide a range of access points, and to promote awareness of them. These may include anonymous complaints boxes or hotlines, email, trade union representatives, elected worker representatives, or a centralised counseling or ombudsman office within the E&R agency.
- It is just as important to ensure that there are effective processes for following up on complaints, not least when they come via hotlines or complaints boxes, including via face-to-face interviews where appropriate.
- Standardising procedures can contribute to a more rigorous and more manageable process, including by: acknowledging receipt of complaints, publicising criteria for accepting or rejecting complaints, providing indicative time frames and updates, and reporting externally on the mechanism.
- It can be helpful to engage internal and/or external experts in evaluating whether actual and potential outcomes are in line with internationally-recognised human rights in challenging cases.
- Training can help build the capacity of workers to use the mechanism, conducted wherever possible with trade unions and other local civil society actors.
- It is important to identify when complainants come from individuals or groups in a position of heightened vulnerability or marginalisation, and take this into account during the handling of their complaint and identifying appropriate remedies. For migrant workers, this means looking particularly at issues of language, culture, anonymity, and the fear of retaliation (e.g., as a result of being reported to the immigration authorities). For female migrant workers, it means considering not only these factors but additional sensitivities involved in handling complaints alleging sexual harassment or violence. Some companies have established migrant worker committees to help address these issues.
- Actively seeking feedback about the mechanism can support continuous learning, for example through satisfaction forms (reflecting views on both the outcome and the quality of the process), worker exit interviews or monthly meetings with management.
- Communicating about outcomes from a mechanism in an appropriate form (e.g., anonymised, aggregated data or case studies), can demonstrate the value of using it – both to workers and to management.

- **Grievances related to business partners:** Where an E&R agency has not contributed to a negative impact caused by one of its business partners, it may nevertheless play a range of roles in helping to seek remediation. For example, it could:
 - Raise the issue with the company concerned, request them to address it directly and confirm the outcome;
 - Support the company in its efforts to address the issue, helping build its capacity to do so where this is weak;
 - Pass the issue to appropriate authorities where it raises criminal concerns;
 - Check whether there are protections in place to prevent complainants from retaliation in each of these cases;
 - Help the company develop or improve its own grievance mechanism, including drawing on the lessons identified above in designing grievance mechanisms for workers.

Where to Start

For companies that are just starting to focus on processes to remediate human rights impacts or to develop operational-level grievance mechanisms, the following are some preliminary steps to consider:



Resources: Designing Operational-Level Grievance Mechanisms

For more about the UN Guiding Principles' effectiveness criteria, see:

- ▶ UN SRSG, Addendum to the UN Guiding Principles, *Piloting principles for effective company/stakeholder grievance mechanisms: A report of lessons learned*, (undertaken by the CSR Initiative, Harvard Kennedy School)
- ▶ CSR Initiative, Harvard Kennedy School, *Rights-Compatible Grievance Mechanisms*
- ▶ CSR Europe, *Company Mechanisms for Addressing Human Rights Complaints (draft version for consultation)*

For general information about non-judicial dispute resolution, see: [ACCESS Facility](#)

Questions to Ask

The following questions correspond to sub-sections A, B and C above. They should help test the extent to which the company's remediation processes, including operational-level grievance mechanisms, are consistent with the Guiding Principles:

VI-A

Building a Systematic Approach to Remediation

- ▶ How do we build support across the company for operational-level grievance mechanisms?
- ▶ How do we track complaints and their outcomes to identify ways we can improve our policies and processes to prevent human rights impacts?
- ▶ How do we identify whether outcomes from remediation processes provide real "remedy" both in the eyes of the affected stakeholders and in line with internationally-recognised human rights?

VI-B

Mapping and Working with External Remediation Mechanisms

- ▶ What is our understanding of the landscape of relevant external grievance mechanisms, both judicial and non-judicial, in the market(s) where we operate? Could we improve it?
- ▶ Do we engage constructively and appropriately with state-based grievance mechanisms, within our own rights to defend ourselves against allegations we consider inaccurate?
- ▶ Do we address access to effective operational-level grievance mechanisms at the earliest stages of our relationships with client companies?
- ▶ How do we ensure that agency workers we place with user enterprises have access to effective grievance mechanisms, and how do they relate to our own role in addressing complaints?

VI-C

Designing Effective Operational-Level Grievance Mechanisms

- ▶ Are there existing mechanisms that we could build on in developing internal capacity to address human rights-related complaints from workers?
- ▶ How do we involve internal and any external stakeholders in the design or review of grievance mechanisms?
- ▶ How do we know our mechanisms are effective from the perspective of those for whose use they are intended? How do we test this with workers?
- ▶ How do we take into account the particular needs of potentially vulnerable workers?
- ▶ If grievances are not resolved through an operational-level mechanism, is it clear to all what the alternative channels are?