

# Grievance Mechanisms

OVERVIEW OF GOOD PRACTICE AND CURRENT  
IMPLEMENTATION BY SELECTED ISEAL COMMUNITY  
MEMBER SCHEMES

BRIEFING NOTE



twentyfifty Ltd  
[www.twentyfifty.co.uk](http://www.twentyfifty.co.uk)

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## 1. PROJECT SUMMARY

Bonsucro and Responsible Jewellery Council engaged Business & Human Rights consultancy [twentyfifty](#) to conduct a research project into Grievance Mechanisms within Voluntary Sustainability Standards (VSS). The research investigated how grievance mechanisms have been set up and how grievances are managed and remediated within their memberships. The document is intended to give a summary of the key findings from this research, share good practice as well as give practical examples for VSS to either introduce new or strengthen existing grievance mechanisms, in alignment with the UNGP and OECD Guidelines.

The organisations included in the research, which was carried out between January and June 2022, were Better Cotton Initiative, Bonsucro, Forest Stewardship Council, Marine Stewardship Council, Rainforest Alliance, Responsible Jewellery Council, Roundtable of Sustainable Biomaterials and The Copper Mark. The research involved an in-depth document review of policies, reports & public information as well as an interview with each organisation to get a more in-depth understanding of their grievance processes.



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## 2. KEY LEARNINGS AND CHALLENGES

This section of the report details some of the key learnings and challenges the VSS we spoke to face when developing and implementing grievance mechanisms. We have split these learnings into the relevant UNGP effectiveness criteria categories.

### Accessibility

The UNGP effectiveness criteria state that stakeholders should know about the mechanism and those who may face barriers to access are provided adequate assistance to access the mechanism. The UNGPs advise that accessibility requires consideration of the barriers that affected stakeholders may face, such as “language, literacy, costs, physical location and fears of reprisal”. A few challenges in relation to accessibility came through in the interviews. Some of the VSS we interviewed only had grievance mechanisms available to their members and therefore were not accessible to the affected rightsholders. For the VSS where their grievance mechanism is available to members as well as external third parties (including rightsholders) the lack of grievances filed from the latter was a concern and could be an indicator towards either lack of awareness of the grievance mechanism or inability to use it.

- **Awareness**

The majority of VSS do not have direct relationships with the affected rightsholders and therefore must somewhat be reliant on their members to filter information down. We discussed whether there should be a requirement for members to inform their affected rightsholders about the VSS level grievance mechanism and the challenges around this which included: 1. how would the VSS enforce or check this is happening, 2. if this would contradict the requirement for members to have their own operational grievance mechanisms and 3. the potential confusion around promoting both grievance mechanisms.

For the majority of VSS grievance mechanisms, their website is the main way for complainants to find out about the complaint process and to file complaints. One way to increase access would be to have telephone hotlines or local contact points in addition to the online offering. Again, there were concerns from VSS around the confusion with member level operational grievance mechanisms as well as the costs involved and the resource needed to monitor these local level grievance mechanisms. There was also a discussion around whether affected rightsholders are aware the company they are wishing to make a complaint about is a member of the VSS in question. All the VSS we spoke to had slightly different membership/ certification models but most felt that those rightsholders on the ground were too far removed to understand the VSS involvement.

- **Ability to use the grievance mechanism**

For VSS that predominately use their websites as the main route to make a complaint, there is the obvious issue of eliminating those wishing to make a complaint that do not have access to the internet. All but one interviewed require written complaints to be submitted and only accept complaints written in English. This is a huge challenge for these VSS that have members in sometimes over 40+ countries to provide the information in all these different languages and well as translation services for those complaints received not in English. For those complainants with limited literacy skills even the ability to be able to make a complaint verbally is vital but again the amount of money and resource needed for this is a barrier for most VSS.

## Predictability

The UNGPs state that the grievance mechanism process is clear, indicative time frames are provided for each stage, there is clarity on the types of process and outcomes available, and implementation is monitored. Positively, all interviewed were able to provide clear timeframes for each stage of the grievance mechanisms but there was some nervousness around the lack of control to stick to these timelines when the process and remediation involves a member company. Another challenge was discussed around lack of knowledge of how long remediation would take and overpromising to potential complainants.

## Transparency and source of continuous learning

Another key discussion point in the interviews was around transparency of grievances submitted as well as using that data to inform future decision making and strategy. The UNGPs advise that transparency requires “providing sufficient information about the mechanism’s performance to build confidence in its effectiveness”. There seemed to be some hesitancy around sharing number of complaints for several reasons including the perception of many complaints. Some may read this as a negative meaning the VSS was not working when in reality it could be that they have an effective grievance mechanism that rightsholders are happy to use.

In addition to recording the number of complaints, compiling detailed information on complaints made could provide VSS with useful information on gaps or areas for improvements for both them and their members. The UNGPs advise grievance mechanisms should be a source of continuous learning and lessons should be identified and improvements made to prevent future grievances and harms. Multiple complaints about one issue such as excessive working hours for example could indicate a sector-wide problem that could benefit from a collaborative approach. Although none of those interviewing publicly analyse their grievances (however, there may be planned public disclosure in the near future), most do review and discuss issues found internally and use this to inform member trainings and reviews.

## Conclusion

We praise all the organisations involved for their openness and honesty during this process. The challenges discussed were common across most of those interviewed and this highlights an opportunity to work together to help address some of these issues. The biggest challenge was around accessibility – both awareness of the mechanism and ability to use the mechanism. The following sections now go into detail on what is an effective grievance mechanism, how VSS and member grievance mechanisms can interact, guidance on how to design a VSS grievance mechanism, how to manage grievances and how to use the results as a source of continuous learning. We have addressed the main issues highlighted in the research findings namely Accessibility, Predictability and Transparency.

### 3. INTRODUCTION TO GRIEVANCE MECHANISMS

Grievance mechanisms are an important part of a businesses’ obligations under the United Nations Guiding Principles (UNGPs). The UNGPs set out that where companies have caused or contributed to an impact, they have a responsibility to provide or contribute to remedy for those that have been affected. An effective grievance mechanism provides companies with a process for systematically receiving, investigating and responding to rightsholder complaints and implementing remedy to solve them.

*“To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may have been adversely impacted.” (Guiding Principle 29)*

Grievance mechanisms should sit within a broader stakeholder engagement approach, offering multiple opportunities for rightsholders to raise concerns and/or provide feedback. They should be just one element in a mutually reinforcing set of systems and activities. Good grievance handling supports good engagement and vice versa.

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

### 3.1 Effective grievance mechanisms

The UNGPs lay out eight effectiveness criteria for non-judicial (formal non-legal) grievance mechanisms. These criteria provide a broad framework for ensuring the process and outcomes of any grievance mechanism are fair and appropriate. The criteria should inform both the design and the operation of any grievance mechanism.

#### The effectiveness criteria:

- **Legitimate:** stakeholders using the process trust it and there is accountability to ensure the process is fair
- **Accessible:** stakeholders know about the mechanism and those who may face barriers to access are provided adequate assistance to access the mechanism
- **Predictable:** the process is clear, indicative time frames are provided for each stage, there is clarity on the types of process and outcomes available, and implementation is monitored
- **Equitable:** stakeholders have access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
- **Transparent:** aggrieved parties are informed about the progress, and provided sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake
- **Rights-compatible:** the outcomes and remedies are in accordance with internationally recognized human rights
- **A source of continuous learning:** lessons learned from implemented measures are identified and improvements are made to the mechanism to prevent future grievances and harm
- **Based on engagement and dialogue:** stakeholder groups are consulted in the design and performance of the mechanism, and dialogue is used as a means to address and resolve grievances.

The following sections are written in line with the above principles and provide practical recommendations on how to establish a grievance mechanism, so the criteria is met. However, this document should only be used as a general guide and should not be considered legal advice.

### 3.2 The business case

In the context of VSS, an effective grievance mechanism is mutually beneficial to the VSS, member companies and rightsholders because it:

- Provides a clear, single structure for affected communities and individuals to safely and confidently raise grievances or concerns related to multiple companies
- Enables early identification of grievances and streamlines the resolution of concerns before they escalate
- Gives insights into how well the standard's requirements and processes are implemented and helps identify potential gaps in current management practices
- Supports member companies and communities to engage with each other to address systemic issues through formalized dialogue
- Demonstrates willingness on the companies' and VSS's part to take rightsholders concerns seriously

- Facilitates a learning culture in which trends and patterns can be analysed to drive continuous improvement across the standard’s management systems
- Improves alignment with international standards and external expectations

#### 4. INTERACTION BETWEEN VSS AND COMPANY LEVEL GRIEVANCE MECHANISMS AND OPPORTUNITIES

Although the basic process of developing and managing a grievance mechanism will be the same regardless of the type of organisation, there are ways to ensure that the relationship between the VSS and company level grievance mechanisms are cohesive and not contradictory.

VSS have the potential to support and strengthen their company members’ mechanisms either by increased guidance and training or by increased requirements for effective grievance mechanisms within their membership. VSS are well-placed to share best practice examples and provide support and advice for their memberships on grievance mechanisms. Depending on the size and resource of the VSS, some could serve as an appeals forum and help company members come to an appropriate remediation. More rigorous requirements to become a member or VSS-led monitoring of company-level grievance mechanisms against the UNGP effectiveness criteria (section 1.4) would help ensure that they are fit for purpose.

Although it is preferable that the grievance is resolved by whichever mechanism is closest to the issues raised, there is a potential conflict when individuals or communities have a lack of trust with the company in question. Here is another opportunity for VSS grievance mechanisms to be accessible to these rightsholders and provide that oversight.

##### 4.1 Effective VSS grievance mechanisms

The [MSI integrity project](#) states that effective VSS grievance mechanisms ideally serve 3 functions:

- **Provide access to a remedy for harms or rights violations suffered by the rightsholders that the VSS seeks to benefit or protect.** Many VSS operate in locations where victims of human rights abuses may have limited opportunities to seek a remedy, making them the only meaningful avenue for a community or individual to obtain redress for harms.
- **Diagnose ongoing violations and hold individual VSS members accountable when they cause harm.** Grievance mechanisms provide a means to track and measure violations over time, providing a better understanding of the scale of a problem and allowing an VSS to gauge its own effectiveness at detecting abuses.
- **Demonstrate the willingness of VSS to advance the interests of the communities that they seek to benefit or protect.** More generally, an effective grievance mechanism shows the willingness of an VSS to ensure that its members—however large or powerful—are accountable to, and provide remedies for, individuals and communities in the event their rights are violated.

#### 5. DESIGNING A GRIEVANCE MECHANISM

##### 5.1 Mapping the context

Before developing a grievance mechanism, it is important to first understand the context in which it will operate. Without this step, inappropriate mechanisms may be developed. As discovered in the



research findings most existing VSS grievance mechanisms are website-based, and these may not be suitable for reaching their affected rightsholders. There might also be existing grievance mechanisms such as effective member mechanisms that are already fit for purpose and do not need to be replicated. Before implementing a grievance mechanism, it is critical to map:

- Potential users (this may include your member companies, but more importantly rightsholders affected by their actions)
- Their needs
- The key risks they face
- What systems are already in place

### Potential users

Potential users of a grievance mechanism include anyone whose human rights could be affected by member companies, their supply chains and/or business relationships. Typical rightsholder groups to consider include employees, customers, consumers, members, communities, suppliers. It is not necessary that the one grievance mechanism should aim to serve all potentially affected groups. A concern raised in the research was lack of resource for grievance mechanisms so mapping all potential users helps to determine which groups may be covered by existing systems and therefore reduce the burden on the VSS. For example, an organisation may end up with a simple email feedback survey for employees, use a third-party hotline for rightsholders' effected by member's activities and a website form for complaints about their members.

### Their needs

To design a mechanism that works for rightsholders it is important to consider their needs. For example:

- What format will work best for them- hotline, suggestion box, email, SMS?
- What languages does the mechanism and supporting materials need to offer?
- Are there any other special needs to consider e.g. rightsholder groups that are isolated such as homeworkers or groups with disabilities?
- How will they find out about the mechanism?

### The key risks

Key risks are any actual or potential risks that might arise from your or your member's operations. Understanding where risks are highest can help to prioritise rightsholder groups who need access to effective grievance mechanisms.

Risks could include:

- Labour rights: discrimination, working hours, wages, health and safety, child labour
- Environment: threats to livelihoods or impacts on health caused by pollution or overuse of scarce resources
- Other human rights: access to land, forced resettlement

Other factors that may increase risk of impacts that should be considered when prioritising are: number of rightsholders potentially affected, country context, nature of operations, nature of rightsholders.

## Systems already in place

Before developing any new mechanisms, an organisation should map all existing mechanisms, both internal and external, that rightsholders can already access to determine where gaps exist. All of the rightsholders that could potentially be impacted by the company should have access to an effective grievance mechanism. This process also often reveals opportunities to leverage existing processes rather than developing new ones. For example, VSS may decide to link their mechanisms to external mechanisms or member mechanisms to benefit from the strengths of both. Another way of addressing this would be increase the requirements for member's grievance mechanisms. This could be done by requiring members to assess their grievance mechanisms against the UNGP effectiveness criteria and asking them to do this regularly and feedback to the VSS. This means the VSS level has less need to reach all member's rightsholders if the member's own grievance mechanisms are effective at doing so.

## 5.2 Determining the scope

Grievance mechanisms work best when they address the types of risks and users for which they are designed. The scope of any mechanism should be thoughtfully considered and any rightsholders or impacts that fall outside of the scope should be covered by a different channel.

Questions to think about to determine scope:

- What types of complaints will the grievance mechanism cover? Only labour issues or will other human rights issues also be accepted? Can an existing grievance mechanism be adapted to increase the scope?
- Who can file a complaint? Can members, workers affected by members' activities, communities all use the same mechanism or will each group be handled by a different mechanism?
- Will it only be available to directly affected rightsholders? Or will NGOs and trade unions be able to use it?
- Will it only be available to affected individuals or can collective complaints be raised?
- Will anonymous grievances be accepted?
- Will there be multiple mechanisms available to rightsholders? And which type of grievance will be dealt with by which channel?

Grievance mechanisms that try to be all things to all people will likely be ill-equipped to resolve issues effectively. The mapping exercise described will help you to determine the scope most appropriate for your organisation as you will see which are the priority rightsholders to cover. You can then determine which type of grievance mechanism best meets the need.

## 5.3 Engaging rightsholders

Involving rightsholders is also crucial for ensuring the mechanism is responsive to their needs. Depending on the scope of the mechanism, rightsholders may provide essential feedback such as particular languages are required, or additional assurances need to be built in to address concerns about retribution or anonymity. Rightsholder involvement also promotes ownership and respect for the mechanism, encouraging greater usage. The involvement of other external stakeholders enables learning from their broader knowledge about what has been tried before, what has worked and what has not. Finally, these representative groups may also be able to support constructive engagement with rightsholders or possibly act as partners when it comes to identifying and implementing remedial action.

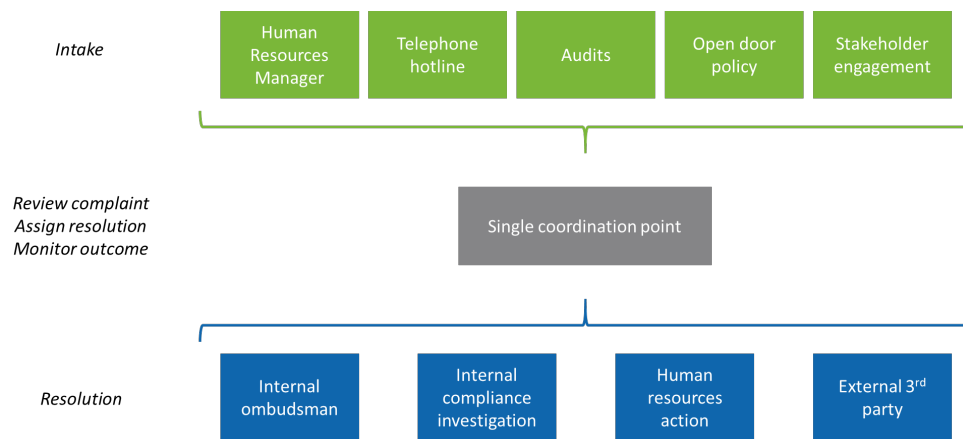
*Potential stakeholders to engage (depending on scope):* member companies/certificate holders, non-corporate members, community groups, civil society, employees of member companies, NGOs, trade unions, local government representatives, representatives of indigenous groups, marginalized groups or vulnerable people.

## 6. MANAGING RAISED GRIEVANCES

### 6.1 Internal governance

#### Streamline the process

The UNGP effectiveness criteria “Accessibility” (see section 1.4) requires that there be multiple pathways for raising a complaint. However, for a company to ensure that the same standard is applied to all complaints raised and to ease the management of the process, it is useful to establish a centralized point for assessment and analysis, who can determine the best avenue for resolution from a range of options. The graphic below shows what this approach looks like.



Source: [Shift workshop report No. 5, May 2014](#)

#### Roles and responsibilities

Effective grievance mechanisms require clear lines of accountability, a defined process and established roles and responsibilities. One department will act as the single coordination point, but there will be others involved in:

- gathering grievances
- implementing responses, and
- monitoring the process.

As part of the development of a grievance mechanism, these roles and responsibilities will need to be clearly established.

## 7. INFORMING RIGHTSHOLDERS

For grievance mechanisms to be used, rightsholders must know about them. This was one of concerns from the research that perhaps those affected rightsholders weren't aware that the VSS level grievance mechanisms existed. Therefore, it is critical that rightsholders are informed of the

mechanisms available to them especially as rightsholders may feel uncomfortable making a complaint to the company they have an issue with. One way some VSS address this is to make it a requirement for member's to make right holders aware of the VSS grievance mechanism and how to access it. Information should be easily accessible and understood by rightsholders. You should make every attempt to limit the barriers to access, this may be about providing information in multiple languages or working through local government. One way of doing this is to partner with third-party organisations to support the implementation of grievance mechanisms for example using a third-party hotline that can be available in multiple languages. *See The Copper Mark example in Appendix II.* Rightsholders should be supported to access relevant expertise and advice throughout the process to support their engagement and understanding.

#### ***Tips for improving access***

- *avoid jargon*
- *promote stakeholder events to discuss issue*
- *provide training on specific issues such as harassment, discrimination and retaliation*
- *produce communication materials*
- *engage with civil society groups on the ground that can help disseminate information.*

### **8. ESTABLISH A PREDICTABLE AND TRANSPARENT PROCESS**

For rightsholders to trust and use the process in place they need to understand how it works. Therefore, it is crucial that the process is 'predictable' (see section 1.4):

- **Set clear timelines for resolution** - this could be as short as 2-3 weeks for some resolutions, or it could be much longer if the issue is complex. It can be useful to set up a system that sends reminders to the resolution team.
- **Keep rightsholders informed** and up-to-date on how decisions are progressing.
- **Review resolutions to ensure they are rights-oriented** – it is important that resolutions don't infringe on the rights of complainants and that the legal framework is clear.
- **Develop a clear system to monitor the resolution** – this could be through regular assessments to verify implementation of resolutions, and/or only allowing the case to be closed when the agreed resolution is fully implemented and feedback gathered.

### **9. SOURCE OF CONTINUOUS LEARNING**

Grievance mechanisms should be regularly monitored, and learnings integrated into the process. This ensures that the mechanism remains relevant and adapts to changing contexts or new information.

- **Establish a centralised system so that grievances can be logged, and the outcomes detailed.** This provides quality control over the implementation of the process, ensuring that the mechanism meets its objectives. Also provides data to analyse systemic patterns and identify gaps which could be addressed through standard requirements and processes.
- **Set up a grievance mechanism working group** amongst key members. This would allow for periodic reviews of complaints to identify systemic/emerging issues, facilitating collaboration on remediation to develop a standard protocol on systemic issues, provide space for sharing best practice between members.

- **Set KPIs to monitor and assess the performance of the mechanism on a regular basis:** Examples – target number of complaints to resolve each year, number of complaints received and resolved, number of cases analysed in accordance with human rights.
- **Establish a regular review of the process,** including feedback from relevant groups such as members, implementation partners, rightsholders representatives (cf. stakeholder map carried out in Mapping context) and use learnings to update the standard requirements and processes / management systems
- **Once a complaint is closed, update the risk register** and disseminate learnings and knowledge management.
- **Publish your findings** publicly as this helps to foster ongoing support and engagement.

## 10. CONCLUSION

This project investigated how grievance mechanisms have been set up and how grievances are managed and remediated within 8 VSS via document review and interviews. The research showed that although most had a grievance mechanism in place, there were a number of challenges that made it difficult to ensure the grievance mechanisms were as effective as they should be. The key challenges identified were accessibility, predictability and transparency. This briefing note is intended to help VSS to address some of these challenges and how VSS have the potential to support and strengthen their company members' mechanisms either by increased guidance and training or by increased requirements.

The following appendix include some good practice examples of VSS grievance mechanisms.

## APPENDIX I – VSS GOOD PRACTICE EXAMPLES

### THE FAIR WEAR FOUNDATION (FWF)

The FWF formed to improve wages and working conditions in the garment industry and its membership are clothing brands. The FWF has designed a grievance mechanism that meets the minimum criteria for effectiveness (see below). The FWF’s complaint procedure reflects many good practices and appears to be centred on the needs of potential complainants, providing a remedy for well-founded complaints.

**Accessibility:** FWF creates “worker-focused promotional materials and trainings” and requires that members have them distributed at factories. FWF trains and manages local complaint handlers in each of the countries where it is active. The complaint handlers accept complaints in multiple formats, including calls or, where possible, social messaging apps. Complainants have the option to remain anonymous to the subject of the complaint. FWF covers the cost of the complaint investigation and provides a translation of the outcome to the complainant if needed.

**Equitability:** The procedure specifies that complaint handlers should inform complainants about the possibilities and limitations of the FWF grievance mechanism as well as other local options to seek a remedy. The complaints handler must ask explicitly whether the complainant (or involved workers, when the complaint comes from a third party) wishes to begin a formal complaint procedure. If so, then the handler explains the procedure and timelines.

**Legitimacy:** The procedure identifies FWF’s role as leading the investigation of complaints as a neutral third party. The criteria for selecting an investigation team include: accessibility, ability to speak the local language, expertise on labour standards and local law, and independence.

**Predictability:** The process is detailed and clearly describes the steps involved, with time frames. The local complaint handler is required to explain the timeline to the complainant.

**Transparency:** FWF has an active case tracker that has updated information on all current and historic cases. Reports on the final decisions include the complainant’s evaluation of the outcome, which is posted on its website.

**Remedy:** If the complaint is found to be grounded, then FWF consults with the complainant on remediation. The member brand is responsible for ensuring that the remediation plan is carried out. FWF specifically requires that member companies use their leverage to ensure suppliers remediate harms. FWF monitors progress by continuing contact with the complainant and the union or worker representative at the factory, and provides the specific steps it takes to ensure members carry out remediation, including reporting failures in the public complaint report. Before a complaint is closed, FWF specifically asks the complainant to evaluate the outcome.

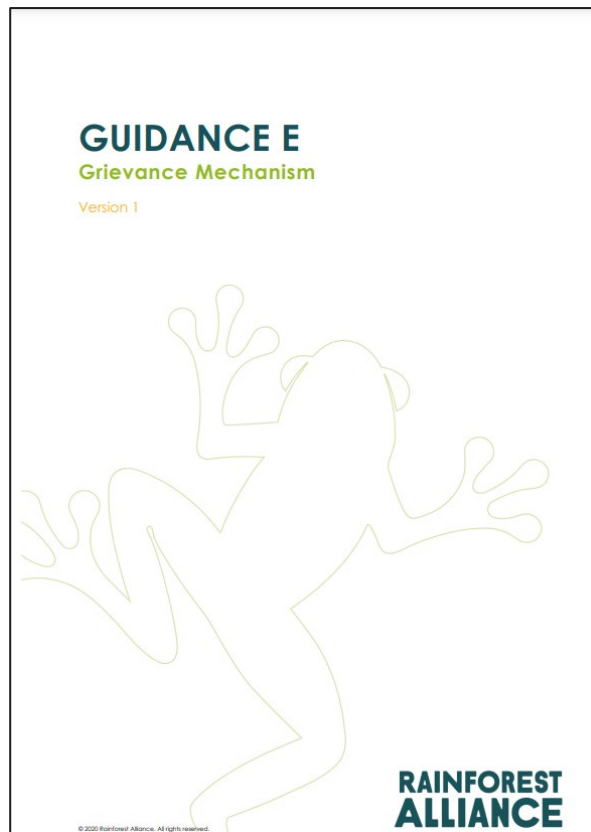
**Continuous learning:** The complaint procedure specifies that FWF will share its “learnings from the system with local institutions and international grievance mechanisms, business associations and trade unions.”

Source: [Fair Wear Foundation, The FWF Complaints Procedure](#)

## RAINFOREST ALLIANCE

Good practice example of guidance provided to certificate holders on how to set up an operational grievance mechanism.

Source: [Rainforest Alliance member guidance - grievance mechanisms](#)



## THE COPPER MARK

The Copper Mark use EthicsPoint for complainants to file complaints so grievances can be recorded verbally and in multiple languages addressing the accessibility issues that many VSS are challenged with.

Source: [The Copper Mark - EthicsPoint hotline](#)

[The Copper Mark Grievance Mechanism](#) addresses concerns arising from producers, stakeholders and the public regarding the initiative, the assurance system, assessor competencies or claims made by participants with regards to their conformance status with the Copper Mark. The Grievance Mechanism aligns with the UN Guiding Principles on Business and Human Rights' criteria for effectiveness of non-judicial grievance mechanisms.

The Copper Mark is committed to an environment where open, honest communications are the expectation. The objective of the Grievance Mechanism is to ensure that grievances raised with the Copper Mark are handled in a timely, comprehensive, consistent, transparent, and effective manner. It is intended to allow Copper Mark stakeholders to raise concerns, have these investigated and provide a remedy, in particular where rights are violated.

You can submit reports relating to

- **Grievances against the Copper Mark.** Grievances about the implementation of the Copper Mark's policies, procedures and operating processes for which its management and board of directors has direct governance responsibility.
- **Grievances against a site assessed using the Copper Mark Assurance Process.** Grievances against a site which does not conform with or follow the guidance of all applicable Copper Mark policies, procedures and documents.

### To Make a Report

You may use either of the following two methods to submit a report:

- Select the **"Make a Report"** link at the top of this web page.

OR

- Select the country in which you are located.

Korea, Republic of South

### OneConnect

From an outside line dial the OneConnect number for your location:

**Korea, Republic of South**.....080-880-5916

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **5-6** business days, use your report key and



## FAIR LABOR ASSOCIATION

Good practice example of VSS that tracks basic information about grievances received

The screenshot shows the Fair Labor Association website. At the top, there is a navigation menu with links for 'About Us', 'MyFLA', 'Registration', 'Accreditation', 'Blog', and 'Contact Us'. Below the menu is a search bar and a world map graphic. The main heading of the page is 'THIRD PARTY COMPLAINT TRACKING CHART'.

The Fair Labor Association tracks all third-party complaints received. Complaints must meet our criteria to be accepted.

*\*Please note that per the FLA Charter, names of companies and factories are not reported unless the complaint reaches Step 2 of the process.*

The tracking chart was updated on April 13, 2022.

DATE	NATURE OF COMPLAINT	FACTORY*	FACTORY LOCATION	COMPLAINANT	FLA AFFILIATED COMPANY*	STATUS	ADDITIONAL INFORMATION
4/13/22	Freedom of association, worker dismissals	Arik Bey Tekstil Beysehir Beybo Boya Seydisehir	Turkey	Union	adidas	Step 3	
5/05/21	Hours of work, employment relationship, employee management systems	Decotex International	El Salvador	Union	Fanatics, Hanesbrands, Nike, Under Armour, Branded Custom Sportswear	Closed	Corrective Action Plan (CAP) report published in English and Spanish. Full investigative report published in English and Spanish. Summary report published in English and Spanish.
7/20/20	Freedom of association	Wells Apparel	Nicaragua	Workers	Amer Sports, New Balance	Closed	Final remediation report published in English and Spanish. Final investigation report published in English and Spanish.
3/16/20	Freedom of association, harassment or abuse, hours of work, wages	Jeans Knit Private Limited	India	Union	adidas	Step 4	Full investigative report published in English and Kannada. Summary report published here.

Source: [“Third Party Complaint Tracking Chart,” Fair Labor Association](#)