Remedying human rights abuses in supply chains: the role of sustainability standards

A learning report to inform practice
This report is based on research, member dialogues and discussions led by ISEAL as part of an eighteen-month project on ‘Advancing thinking and action on access to remedy through sustainability standards and systems’ supported by the Ministry for Foreign Affairs, Government of Netherlands. It aims to support learning within and beyond the ISEAL Community on how voluntary multistakeholder sustainability tools can play a role in remediation efforts for business related human rights harms. This report was authored by Vidya Rangan, Senior Manager, Impacts and Innovations at ISEAL. For comments and queries, please contact amandine@isealalliance.org.

Acknowledgements

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Introduction
Introduction

Remediation is a fundamental principle of international human rights which requires that when an individual or community’s rights have been violated or harms caused, these need to be remediated or redressed.

Measures to improve business accountability on human rights are gaining traction, and whilst much of the focus is on prevention and mitigation of human rights risks, the question of remedying harms already caused by business activities also needs attention. Remediation processes also have a vital role to play in due diligence in helping track grievances and ensuring that harms caused are not repeated.

The United Nations Guiding Principles on Business and Human Rights (henceforth UNGPs) identify access to remedy as a key component of advancing business accountability on human rights and thus improving human rights outcomes. The UNGPs prescribe a role for state agencies, business enterprises and independent multistakeholder initiatives and collaborations in advancing remedy efforts.

Over the last two years, ISEAL has been implementing a dedicated workstream to support voluntary sustainability schemes within the ISEAL Community advance thinking and action on remediation. With the support of the UN OHCHR Accountability and Remedy Project (henceforth ARP), ISEAL has led a series of nine dialogues with our membership on various topics linked to remediation including building grievance mechanisms, provision of substantive remedy and links between remediation and emerging due diligence legislation. Our participants included staff from the UN ARP team, staff from ISEAL member organisations and external experts (see Annex 1 for details). The objective of these dialogues was to build awareness and knowledge on key remediation concepts and activities, take stock of existing efforts on remediation, identify cross-cutting challenges and inspire further action on this topic. This report documents insights and learnings from these discussions to advance efforts by voluntary systems within and beyond the ISEAL community on remediation, especially in relation to human rights harms.

Our work to date validates the thinking of the UNGPs – that multistakeholder initiatives such as sustainability standards and systems have an important and often critical role to play in improving access to remedy and enabling remedy outcomes for rightholders affected by business activities. Within the ISEAL Community, several schemes in sectors such as agriculture, seafood, mining and textiles already have human rights protection and remediation as an area of focus. Others are contemplating actions on remediation in response to emerging rights violations in their supply chains. With mandatory due diligence legislation also including requirements on remediation, the scope and opportunity for such tools to support remedy efforts is not to be underestimated.

We hope this report offers further food for thought and action by ISEAL members in identifying and advancing their role in remediation efforts, and in doing so, positions voluntary tools as a critical part of the toolkit to improve business accountability and due diligence on human rights. We also hope it demonstrates to policymakers and companies that voluntary tools such as sustainability standards have a constructive role to play in human rights protection and remediation in supply chains.

The report is comprised of three parts. Part 1 discusses the basics of remediation and makes the case for how sustainability standards can support remediation efforts for supply chain linked human rights abuses. Part 2 focusses on procedural remedy and how sustainability standards can improve their grievance mechanisms at site and scheme level as a first step towards supporting remedial action. Part 3 focusses on substantive remedy underlining the importance of partnerships and a collaborative approach to delivering remedy on the ground. We conclude with a note on requirements in emerging due diligence legislation on remediation and what this means for how schemes need to evolve in response.
Remediating human rights harms: what role can voluntary systems play?
The aim of remedy or remediation is to counteract or make good any human rights harms that have occurred. The remediation principle has been recognised in a range of international legal and human rights instruments including the United Nations Universal Declaration on Human Rights, United Nations General Resolution 60/147 and importantly, for the context of this report, the UN Guiding Principles on Business and Human Rights.

The adoption of the United Nations Guiding Principles on Business and Human Rights (henceforth UNGPs) in 2011 was a landmark moment for enhancing corporate accountability for human rights protection in business actions and value chains. More than a decade on, the UNGPs are recognised as the authoritative guiding framework to advance responsibility and accountability in the context of business and human rights. Remediation is at the heart of the UNGPs with Pillar III of the Principles focussed entirely on access to remedy to ensure not only that businesses take steps to prevent human rights abuses but are held accountable to provide remedy when such abuses do occur. Accordingly, Pillar III of the Principles lays out guidelines on how judicial (led by courts), state-based non-judicial (led by states and related state entities) and non-state-based grievance mechanisms (such as led by businesses or multistakeholder collaborative initiatives) all have a role to play in enhancing access to remedy and ultimately supporting remediation of harms caused.

Despite its significance in international human rights frameworks, remediation has been a fairly neglected dimension of the business and human rights discussion, relative to the two other pillars on which the UNGPs are based. A UN Working Group review of the implementation of the UNGPs revealed that although the UNGPs had done well to establish corporate accountability for harms caused and the importance of complementarity between judicial and non-judicial remedies, rightsholders and victims of abuse continued to face several barriers in accessing remedy. Further still, the general sense was of there being “a range of options to access remedy but not much actual remedy”. This review, along with the reality that business-related human rights harms continue to rise and quite often go unaddressed, highlight the urgency of acting on remediation to advance the business and human rights debate.
The role for voluntary sustainability standards in advancing remediation

Sustainability standards and similar systems are independent, third-party multistakeholder tools adopted voluntarily by businesses and supply chain actors across sectors.

Such tools provide frameworks for sustainability by laying out standards, principles, or codes of conduct to advance action on key sustainability criteria and providing some form of verification against such rules. Adopted by businesses for over two decades, today voluntary standards are a recognised approach to advance supply chain sustainability and improve business responsibility on social, environmental, and economic dimensions.

The UNGPs lay out a clear and compelling role for voluntary, multistakeholder tools in advancing access to remedy by recognising their role in ensuring that effective grievance mechanisms are available to rightholders (such mechanisms are often referred to as MSI NSBGMs Multistakeholder Initiatives Non-State Based Grievance Mechanisms). In doing so, the UNGPs draw attention to the legitimate role that such tools, and the grievance mechanisms they run, can play in offering a platform for remediating human rights harms caused by business activity. Building on this, subsequent guidance from the United Nations ARP team sheds further light on the contributions that such tools can make towards remediation and how to enhance their impact.

ARP analysis notes that grievance mechanisms operated by third-party multistakeholder mechanisms may be more trusted by rightsholders who may not want to use business run mechanisms. The multistakeholder and transnational nature of such mechanisms can play a key role in identifying and facilitating remedy for harms caused by transnational business activities. There is possibly greater awareness and accessibility by rightholders to such mechanisms and also that such GMs may be an important route for victims who may not wish to pursue judicial routes to remedy due to costs and delays involved and business grievance mechanisms for fear of retaliation.

Importantly, such mechanisms are an opportunity to hold site-level or company-level actors accountable for their responsibility to respect human rights, especially if company failure to engage with MSI NSBGMs requirements results in loss of certification or other commercial consequences. For businesses, a key argument is to work collaboratively to deliver effective remedies and strengthen their leverage through collective action – systemic risks might not be addressable by one party alone. It was also noted that such mechanisms can bridge gaps in the capacity of small-medium enterprises to deliver effective grievance mechanisms at site or operational level. Critically, NSGBMs developed by MSIs can drive sector-wide improvements and standardization of human rights policies and practices.

These arguments, and evidence from research and consultations, suggest that voluntary tools can play a key role in the “remedy ecosystem”. The “remedy ecosystem” approach recognises that there are many points of interconnection between different laws, policies, institutions, mechanisms and actors that are relevant to whether or not people will receive remedies for harm. It focuses on the way the system operates as a whole to deliver remedies to affected people rather than on the roles, attributes and mechanics of individual mechanisms (UN OHCHR, 2021). A key message from the ARP is the role that such tools can play in improving interactions between various elements of the remedy ecosystem at the local level through stakeholder engagement in addition to providing access to remedy themselves.

The subsequent chapters of this report detail learnings from ISEAL’s work on advancing thinking and action on remediation with its members on three specific aspects of remediation – effective grievance mechanisms, facilitating substantive remedy and links to human rights due diligence.
Advancing access to remedy: strengthening grievance mechanisms
Advancing access to remedy: strengthening grievance mechanisms

The term grievance mechanism is used to indicate any routinized, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights harms can be raised and remedy can be sought (Principle 25 Commentary, UNGPs, 2011). It is used as a broad term to cover a wide range of mechanisms that cover complaints and disputes involving enterprises and their stakeholders (UN OHCHR, 2012). The existence of effective grievance mechanisms is a foundational step in providing access to remedy for human rights harms caused by businesses. A grievance mechanism is the basis of implementing the procedural aspect of remediation – that procedures or mechanisms exist for rightholders to raise grievances in relation to human rights abuses or harms that they have faced, and can be a vehicle through which effective substantive remedies can be delivered.

The UNGPs lay out clearly how states, business enterprises and MSIs (such as voluntary sustainability systems) all have a role to play in the remedy ecosystem. The key principles laid out by the UNGPs are:

- **Principles 25-27**: State-based judicial and non-judicial grievance mechanisms should form the foundation of a wider system of remedy. State-based grievance mechanisms may be administered by a branch or agency of the State, or by an independent body on a statutory or constitutional basis. They may be judicial (eg: courts) or non-judicial (eg: labour tribunals, national human rights institutions, National Contact Points for Responsible Business Conduct under the OECD Guidelines, many ombudsperson offices, and Government-run complaints offices.)

- **Principle 29**: 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 be adversely impacted. An operational-level grievance mechanism is a formalised means through which individuals or groups can raise concerns about the impact an enterprise has on them—including, but not exclusively, on their human rights—and can seek remedy.

- **Principle 30**: Industry, multi-stakeholder and other collaborative initiatives that are based on respect for human rights-related standards should ensure that effective grievance mechanisms are available.

1 Grievance mechanisms are sometimes referred to as complaints mechanisms or dispute resolution mechanisms. Although the UNGPs do not prescribe the use of this specific term, it is important to avoid using alternate terms that may belittle or downgrade the severity of the situation from a rightholder’s standpoint. Read the response to Q.71 in the UN OHCHR’s Interpretative Guide to the Corporate Responsibility to Respect Human Rights – “It is possible that the term may have unhelpful connotations in some cultures or contexts, and it is certainly not necessary to label every grievance mechanism with this name. However, it is risky to call a grievance mechanism by a name that its potential users may find inappropriate, for instance one that diminishes or glosses over its real purpose. Doing so may make it more palatable for the enterprise but leave those with grievances feeling belittled and disrespected” (UN OHCHR, pg 70).
As the figure below shows, these various levels of grievance mechanisms are important components of the remedy ecosystem that rightsholders can access to raise grievances linked to harms caused by business activities. Note that grievance mechanisms of voluntary sustainability systems are examples of non-state-based grievance mechanisms (NSBGMs).

This section explores the role that voluntary sustainability systems can place in enhancing access to remedy in two important ways – first by developing their own grievance mechanisms and secondly by requiring through their standards that supply chain actors or businesses set up operational level grievance mechanisms.
Non-State-based grievance mechanisms and the role of voluntary sustainability systems

There are two primary mechanisms by which voluntary sustainability systems can enhance access to remedy. The first is by administering scheme-level grievance mechanisms and the second is by requiring the establishment of site or operational level grievance mechanisms as part of requirements in their standard. We explore both mechanisms in more detail below.

**Scheme-level grievance mechanisms**

A scheme or organisational-level grievance mechanism is one that exists at the level of the entire scheme or organisation. These are centrally administered by the scheme-owner or system-owner and often form part of the scheme’s accountability mechanism to its stakeholders. Such grievance mechanisms are recognised by the UNGPs as types of NSBGMs and can be used by individual rightholders or groups who are adversely affected by scheme’s activities or those of its members, clients or partners.

Within ISEAL, all voluntary sustainability systems that are part of the ISEAL Community ‘must have a publicly available complaint or dispute resolution mechanism’ (ISEAL Community Membership Criteria, 2020). This means that irrespective of their level of ambition or focus on human rights, all such systems in the ISEAL Community have some form of scheme-level grievance mechanism in place. In addition, the newly published ‘ISEAL Code of Good Practice for Sustainability Systems’ has a new clause requiring ISEAL code-compliant members to make clear what role their scheme or system will play in remediying adverse human rights and environmental impacts caused by implementation of their scheme.

**Site-level or operational-level grievance mechanisms**

Voluntary schemes may also require, through their standard, criteria or codes, the set-up of grievance mechanisms at site, enterprise or certified entity level. The ARP defines operational-level grievance mechanisms as “a subset of non-State-based grievance mechanisms, which are distinguishable by their close connections to the operations of a company (or group of companies). They are a means through which individuals or groups can raise grievances about actual or potential human rights impacts directly with the company (or companies) concerned and seek a remedy. These grievance mechanisms are referred to as “operational-level” because they seek to respond to grievances that have, or could have, human rights implications, and that arise from an aspect of a company’s operations.”
In this case, voluntary schemes use their role as standard-setting systems to require the set-up of operational level grievance mechanisms for all or a subset of their direct clients such as certified farms, fisheries, forestry management units, producer organisations or other types of entities adopting their standards. Requirements around the set-up of site-level grievance mechanisms mean that the scheme also undertakes some form of assurance or verification that this requirement is being met.

Additionally, voluntary sustainability systems that offer membership to companies and business clients may have a further role to play in encouraging the set up of operational grievance mechanisms as part of membership requirements to join the scheme. In this case, the scheme uses its leverage as a membership-based organisation to require individual companies that are members to set up and maintain grievance mechanisms, especially if one is not already in place.

### Scheme Level Grievance Mechanisms

Centrally administered grievance or complaints mechanism set up by the scheme-owner or system-owner and part of the scheme’s accountability mechanism to its stakeholders

### Operational (Or Site) Level Grievance Mechanisms

| As part of requirements in the scheme’s standard or code that are applicable to all or a subset of operations that the standard applies to | As part of requirements in scheme membership that are applicable to all or a subset of operations that are members |
Assessing the effectiveness of grievance mechanisms

Although having a grievance mechanism is a good first step in acting on remediation, such mechanisms are useful to rightholders only if they are effective.

The UNGPs lay out clear criteria on what constitutes effectiveness, especially for non-judicial grievance mechanisms (Article 31) as captured in the table below.

<table>
<thead>
<tr>
<th>Category</th>
<th>Definition</th>
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<tr>
<td><strong>LEGITIMATE</strong></td>
<td>A legitimate grievance mechanism is one that:</td>
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<td></td>
<td>- enables trust from stakeholder groups for whose use they are intended; and</td>
</tr>
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<td></td>
<td>- is accountable for the fair conduct of grievance processes</td>
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<tr>
<td><strong>ACCESSIBLE</strong></td>
<td>An accessible grievance mechanism is one that:</td>
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<td></td>
<td>- is known to all stakeholder groups for whose use they are intended; and</td>
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<tr>
<td></td>
<td>- provides adequate assistance for those who may face particular barriers to access.</td>
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<tr>
<td><strong>PREDICTABLE</strong></td>
<td>A predictable grievance mechanism is one that provides:</td>
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<td></td>
<td>- a clear and known procedure with an indicative time frame for each phase; and</td>
</tr>
<tr>
<td></td>
<td>- clarity on the types of process and outcome available and means of monitoring implementation.</td>
</tr>
<tr>
<td><strong>EQUITABLE</strong></td>
<td>An equitable grievance mechanism is one that seeks to ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on a fair, informed, and respectful terms.</td>
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<tr>
<td><strong>TRANSPARENT</strong></td>
<td>A transparent grievance mechanism is one that:</td>
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<td></td>
<td>- keeps parties to a grievance informed about its progress; and</td>
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<tr>
<td></td>
<td>- provides sufficient information about its performance to build confidence in its effectiveness and to meet public interest at stake.</td>
</tr>
<tr>
<td><strong>RIGHTS-COMPATIBLE</strong></td>
<td>A rights-compatible mechanism is one that ensures that outcomes and remedies accord with internationally recognized human rights.</td>
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<td><strong>SOURCE OF CONTINUOUS LEARNING</strong></td>
<td>A mechanism is a source of continuous learning when it draws on relevant measures to identify lessons:</td>
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<td></td>
<td>- to improve the mechanism; and</td>
</tr>
<tr>
<td></td>
<td>- to prevent future grievances and harms.</td>
</tr>
<tr>
<td><strong>BASED ON ENGAGEMENT AND DIALOGUE</strong></td>
<td>An operational-level mechanism is based on engagement and dialogue when it:</td>
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<td></td>
<td>- consults the stakeholder groups for whose use it is intended on its design and performance; and</td>
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<tr>
<td></td>
<td>- focuses on dialogue as the means to address and resolve grievances.</td>
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In an effort to improve the effectiveness of non-judicial grievance mechanisms administered by companies or multistakeholder collaborations, the OHCHR has developed guidance on understanding and operationalising the UNGPs effectiveness criteria. In addition to the eight criteria, the guidance also mentions six cross-cutting themes to improve the effectiveness of grievance mechanisms – gender considerations; protection from risk of retaliation; meaningful stakeholder engagement; links with human rights due diligence; transparency and good communication and responding to the remedy ecosystem.

ISEAL desk-review of effectiveness of member grievance mechanisms

To help understand the current status of effectiveness of grievance mechanisms (or complaints mechanisms) that ISEAL Community Members had in place, the ISEAL Secretariat undertook a desk-review and analysis in October 2022. The aim of the review was to apply the UNGPs Effectiveness Criteria to publicly available information about the grievance or complaints mechanism of all ISEAL Community Members at the time (36 organisations as of October 2022) and understand main gaps, cross-cutting challenges and generate learnings for the community. The methodology involved converting the 8 Effectiveness Criteria into a set of 27 best practice indicators and scoring each member on each indicator (1 if met and 0 if not) to generate an overall picture of effectiveness. While the review had limitations of only working off publicly available information and not having full visibility of implementation, it did provide interesting insights to spur discussion and focus areas of improvements for the community.

As Figure 1 below suggests, the overall picture emerging from the review indicated that there is ample scope for ISEAL members to improve the effectiveness of their complaints and grievance mechanisms in relation to human rights issues. Against a total score of 27 best practice criteria, the average score across 36 members was 12 meaning that on average, an ISEAL Community Member’s complaints mechanism would meet only 12/27 of the best practice criteria for effective grievance mechanisms.

Figure 1: Result of desk-based assessment of ISEAL Community Members’ Complaints Mechanisms
A closer look at specific principles revealed an interesting picture with clear areas where members performed better and others that were a challenge across the board, as seen in Figure 2 below.

**Accessibility:** Performance on accessibility was uniformly low across ISEAL members. Less than a third of ISEAL members met most of the indicators on accessibility. Reasons for this included many schemes making information on their complaints mechanism only available on their website, only in one language and only through one modality (most commonly through sending an email to a centralised email id). Schemes did perform better on the criterion of ensuring anonymity and protection for the complainant, which is an important aspect to engender trust and encourage people to use the mechanism.

**Legitimacy:** Performance on legitimacy was mixed with schemes performing well on some criteria such as ensuring a separate person, department or entity managed grievances but poorly on others such as ensuring grievances are managed without undue influence from interested parties or consulting external experts in the set up and management of a grievance mechanism.

Overall, the ISEAL desk review suggests that in order to be more effective, members can systematically improve specific areas of their complaints and grievance mechanisms to make them more suited and fit for purpose to respond to business and human rights related issues.

**Figure 2:**
Assessment of ISEAL Members’ Complaints Mechanisms: results across effectiveness principles
ISEAL Effective Grievance Mechanisms Self-Assessment Tool

In January 2023, ISEAL launched a tool to support members self-assess the effectiveness of their existing complaints or grievance mechanisms and improve them over time. The ISEAL Effective Grievance Mechanisms Self-Assessment Tool aims to support ISEAL Community Members in assessing the effectiveness of their existing grievance or complaints mechanisms against the eight effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights (UNGPs).

Originally developed as part of an ISEAL Innovation Fund Project, led by Bonsucro and the Responsible Jewellery Council and supported with funds from SECO (the Swiss State Secretariat for Economic Affairs), the tool includes an indicator checklist and guidance note on how to apply and use the checklist. We hope the tool is useful to help members identify gaps in their grievance mechanisms and improvements that can make it more responsive and suited to business-lined human rights issues.
Member experiences in developing and managing grievance mechanisms

In addition to assessing system effectiveness, we were also keen to learn from members about implementation related challenges and solutions in how they were administering grievance mechanisms. We explored the topic in a range of ISEAL Member Dialogues over the last eighteen months and capture some of the key insights here.

<table>
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<tr>
<th>SCHEME LEVEL GRIEVANCE MECHANISMS</th>
<th>OPERATIONAL GRIEVANCE MECHANISMS</th>
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<tr>
<td><strong>Challenges</strong></td>
<td><strong>Challenges</strong></td>
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<tr>
<td>Resources needed to establish and effectively running GMs for large global schemes. Additionally, financial and language barriers to making GMs more accessible and widen reach to range of rightholders across geographical contexts.</td>
<td>Lack of clarity on the intent of the standard regarding remediation and the specific requirements from certified operations in the set-up and effectiveness of the grievance mechanism but also the managing of the mechanism and delivery of remedy.</td>
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<td>Lack of stakeholder knowledge of the existence of the grievance mechanism or understanding of how to use it.</td>
<td>Auditable requirements in the standard around grievance mechanisms and remedy and what types of proof or evidence could be provided to consider certificate holders to be in compliance with the standard.</td>
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<tr>
<td>Potential lack of trust in using a grievance mechanism set up by an independent third party, especially if the scheme was seen as having close relations with businesses.</td>
<td>Confidentiality of complaints raised and sensitivities on the case limiting information sharing with the scheme and resultant ability of the scheme to effect change.</td>
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<tr>
<td>Challenges around how to manage third-party independent investigations, as part of handling complaints and grievances.</td>
<td>Auditor competence in understanding grievance mechanisms, remedy and the principles of good remediation.</td>
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<td>Lack of clarity around what the role of the scheme secretariat was as against that of the independent investigator, how to maintain lines of separation and reduce chances of influence or bias in handling the grievance, especially given power dynamics at play.</td>
<td>Operational level GMs not receiving complaints owing to a lack of capacity at community and individual certificate holder level to administer such mechanisms (especially in cases such as smallholder group certification models).</td>
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<tr>
<td><strong>Solutions &amp; innovations</strong></td>
<td><strong>Solutions &amp; innovations</strong></td>
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<tr>
<td>Hire a competent, independent external partner to run the grievance mechanism.</td>
<td>Training programmes for auditors, creating a peer-learning community and improving awareness-raising around grievance handling as key response measures.</td>
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<td>Informing field staff, partners and auditors to make certified entities and rightholders aware of the scheme’s mechanism and expanding access by opening telephone hot lines in addition to only receiving complaints over email.</td>
<td>Issuing more guidance to field operators and certified entities and build capacity on how to operationalise requirements in the standard around the set-up and effective management of grievance mechanisms.</td>
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<tr>
<td>Exploring a range of alternate dispute resolution methods, bilateral engagement and mediation to resolve grievances and arrive at a resolution acceptable to all parties.</td>
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<tr>
<td>Ensuring post-complaints monitoring is effective and to not let go of cases after a resolution has been achieved but monitor to see if the terms of the resolution (or remedy) are being duly implemented.</td>
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Many ISEAL members are proactively evaluating the effectiveness of their scheme and operational grievance mechanisms to respond better to human rights risks in supply chains. Important learnings around operational-level grievance mechanisms emerged from a recent study published by one member to study the effectiveness of their standard requirements around access to remedy. Another member who had undertaken an impact study on the implementation of key social criteria in their standards spoke about a range of improvements being made in light of results linked to requirements around operational-level grievance mechanisms. An interesting point raised was on differences in cultural attitudes to transparency around complaints and grievance handling by operators in different parts of the world. The overall sentiment was that if functionally well, there is a strong opportunity that such mechanisms can create for expanding the remedy ecosystem at the local level for rightholders, even when the grievance mechanism of the scheme may not be accessible.

In summary, our dialogues reiterated the central message of the UNGPs that voluntary, multistakeholder initiatives such as sustainability standards can make a key contribution by setting up effective grievance mechanisms themselves and requiring operations to set it up at site level as well. There are clear areas for improving the effectiveness of scheme-level grievance mechanisms with important ones being accessibility (making sure people know of and use it), legitimacy (to engender trust) and as a source for continuous improvement. For operational-level grievance mechanisms, clarity of the standard and its requirements around access to and provision of remedy, improving audit competence and capabilities and overall awareness-raising on remediation are key focus areas for improvement.
Advancing remediation of human rights abuses: mandate, partnership, and collaboration
Advancing remediation of human rights abuses: mandate, partnership, and collaboration

While grievance mechanisms can make a strong contribution to enhancing access to remedy, ultimately it is actual remediation or reparation that rightholders seek.

Substantive remedy refers to the outcomes of a process to address harms, often referred to as ‘reparations’. Reparations are an integral part of the right to remedy: without them, the obligation to provide an effective remedy is not fulfilled. Without substantive remedy, access to remedy is meaningless and remediation efforts remain at a purely administrative level of raising grievances or complaints.

For voluntary sustainability tools, questions often arise as to what role they can and should play in delivering or facilitating the provision of substantive remedy. A range of questions concern those operating such tools ranging from legal mandate and accountability to infrastructure and resourcing needed to be effective in delivering remedy. This section draws out insights from our dialogues on this aspect of remediation.
A first consideration for many schemes and multistakeholder initiatives is understanding and establishing the mandate that they would like to have, and importantly, their stakeholders will accept, in the context of delivering remedy.

Our dialogues revealed that there is no simple answer to whether the mandate exists or not but that schemes need to think through a range of questions to seek and establish mandate proactively.

There are three interlinking domains that schemes should consider in helping establish mandate for what role they will play in remediating human rights harms. For simplicity, we break these down into the domains of Accountability, Ambition and Added Value and present critical questions for schemes to think through in each domain.

1. **Accountability – the scheme’s current area of operations and scope of harms involved**
   - What kinds of human rights harms do we need to respond to? What is the frequency and severity of harms?
   - What does the evidence say on human rights harms resulting from business partners / clients / supply chain operators?
   - What types of grievances and complaints are rights-holders raising through scheme or operational-level grievance mechanisms?

2. **Ambition – the scheme’s mission and ambition on remediation**
   - What do we commit to in our governance and strategy documents on remediation? What expectations do rightsholders have on us and can we find out more?
   - Can we act as direct remedy providers? Or are we a “remedy enabler”? Or both?
   - If direct remedy providers, in relation to which types of harms? What resources do we have (e.g. funding, personnel)?
   - Where (and how) can we have the most impact (in terms of delivering positive outcomes for affected people)?

3. **Added Value – the institutional landscape within which the scheme operates and what value it will add to the remedy ecosystem**
   - What systems of regulation – and regulators – do we need to be aware of? Do any of these offer GMs of their own? If so, what do these do?
   - How is my sector governed? What laws are relevant? What judicial and non-judicial mechanisms might rights-holders have access to (or not)?
   - Where are the main gaps in the remedy ecosystem we are working in?
   - Where is the abuse taking place? What “background regimes” do I need to be aware of?
In considering these questions, schemes that want to play a proactive role can consider the ways in which they can be a remedy enabler and a remedy provider. Going a step further, we can conceptualise a spectrum of engagement and a range of roles that sustainability standards can play on remediation as laid out in the figure below, all of which can play an important contribution in the remedy ecosystem available to rightholders.

These range from playing roles of information-provider or in capacity building and raising awareness of rights and grievance mechanisms that may involve low levels of efforts and could be integrated into ongoing scheme activities. A clear role exists for schemes that have a focus on human rights, in building and strengthening effective grievance mechanisms to advance access to effective remedy for victims of abuse. However, looking beyond this, sustainability standards could go further in shaping themselves to be ‘remedy enablers’ or even ‘remedy providers’ and be proactive in supporting the delivery of substantive remedy. These roles require clear establishment of mandate, local partnerships, effective stakeholder engagement (especially with rightholders) and resourcing to be effective and sustainable in the long run. While many ISEAL members are improving their grievance mechanisms at scheme level or strengthening standards for operational-level GMs, our dialogues indicate that a few are considering roles they can play in provision of substantive remedy in the far end of the spectrum as well. This is encouraging to see and speaks to how voluntary tools are clarifying and expanding their mandate and role in remediation of human rights harms.

Irrespective of ambition levels on remediation, schemes can take an important first step in developing a full picture of the remedy ecosystem in which they and their rightholders operate and identify, with partners, meaningful roles that they could play in this ecosystem. The remedy ecosystem approach recognises that sometimes multiple mechanisms may be needed to provide an effective remedy in a particular case. In such cases, understanding the interactions and interlinkages between the different remedy mechanisms (judicial, non-judicial, company-based) can help schemes understand where they can target their efforts most effectively. Schemes can also use their leverage with multiple stakeholder groups and convening power to strive for a more integrated remedy framework by identifying synergies, bridging gaps and ultimately help build a more navigable remedy landscape for victims.

Figure 3:
Range of roles schemes can adopt in advancing remediation

<table>
<thead>
<tr>
<th>Information provider</th>
<th>Outreach and capacity building</th>
<th>Access to remedy</th>
<th>Remedy enabler</th>
<th>Remedy provider</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share information on remedy options for right-holders at state, company level</td>
<td>Build capacity on rights awareness, legal or financial support at ground level</td>
<td>Set up rights-compatible and effective grievance mechanisms at scheme level or require this at site-level</td>
<td>Independent investigation, facilitate dispute resolution or mediation to resolve grievances, referrals to judicial system</td>
<td>Working independently with partners or with state and regulatory agencies to provide remedy</td>
</tr>
</tbody>
</table>
Building partnerships and collaborating to facilitate remedy

Our dialogues also explored how and where voluntary standards and systems can identify suitable partners to support remediation efforts at the local level.

For multistakeholder tools to be effective in their remediation actions, strong and trustworthy local partnerships are needed. It takes work to find the right, qualified and trusted partner but investing in this will yield results in the long term for schemes and rightsholders. We also explored collaborations between schemes as a specific type of partnership to widen scope and deepen impact of remedial work in sectors and regions of common interest.

Partnerships to design and deliver local remedy solutions

ARP guidance highlights how effective partnerships can enhance the delivery of remedies in a range of ways. Partnerships can provide detailed insight and mapping into the stakeholder engagement necessary on key aspects of delivering remedy and support with risk analysis and root cause analysis for systemic problems leading to rights’ abuse. Partners can help generate creative, culturally relevant and innovative remediation solutions leading to better outcomes for affected people. Finally, partnerships are essential for ‘last mile effectiveness’ - ensuring that identified remedies are properly and thoroughly implemented.

Useful insights are shared in a resource produced by the Remedy Project, as part the ISEAL Innovation Fund project led by Bonsucro and the Responsible Jewellery Council. The report lays out a range of activities that local partners can support schemes with in both the set up and implementation of grievance mechanisms.

- Building trust through stakeholder engagement and mapping, enabling participation by rightsholders, sharing information about grievance mechanisms and building awareness and capacity on rights
- Submitting and receiving a grievance through helping rightsholders access and fill forms, technological and evidence-gathering support
- Verifying and investigating the grievance through research, evidence-gathering and navigating the process
- Redressing the grievance through effective stakeholder dialogue in designing effective remedies and developing a corrective action plan
- Implementing and monitoring actions through local liaison and verifying directly with rightsholders
- Incorporating feedback and evaluating results: through informing changes and improvements in grievance mechanisms and sharing information back with rightsholders on policy changes

The paper also provides guidance on criteria that local partners must meet to be effective at supporting remediation efforts at the local level. A key message from this work was the importance of ensuring partnerships establish and engender trust in the mechanism and those who run it. High-trust partnerships tend to be more efficient and cost-effective – transaction costs are reduced, knowledge exchange is rapid, and risks are proactively identified.

Finally, in our dialogues, experts also outlined the role that partnerships can play in being a bridge between non-state-based grievance mechanisms and state-based remedy mechanisms. For example, many voluntary multistakeholder initiatives or companies spend a vast amount of time and resources in trying to resolve grievances that should legitimately be resolved through state and judicial mechanisms. Instead, they could establish a clear mechanism of referrals that ensure that certain types of harms - such as those of a criminal nature or those that involve high risks – are referred on to judicial or para-state authorities. It is important for initiatives to have systems in place to flag where referrals might be necessary, but also to ensure that the risks (e.g. to people’s safety or freedom) are properly understood and appropriate mitigation measures are put in place.
Trusted partners who understand the local legal and implementation realities can play a key role in delineating the roles of different actors in the remedy ecosystem and facilitating referrals across mechanisms to deliver remedy faster and in a more cost-effective way.

Collaborations between schemes on remedial action

In some contexts, it may make more sense for schemes to collaborate rather than implement remediation efforts individually. Guidance from the Accountability and Remedy Project specifically notes that “Operators of non-State-based grievance mechanisms should cooperate proactively and constructively with each other in order to raise standards and promote good practices with respect to the resolution of grievances arising from business-related human rights harms.” (OHCHR ARP III). Our dialogues also explored how schemes and multistakeholder initiatives could expand the reach and impact of remediation efforts by collaborating and pooling resources.

Our dialogues explored two specific examples of collaborative remediation efforts. The first is a collaboration between the Fair Wear Foundation, the Partnership for Sustainable Textiles and AMFORI as three leading MSIs operating in the textile and apparel industry. The goal of the partnership was to manage joint handling of grievances from shared factories for more leverage and effectiveness. The programme established a common procedure between the three organisations for handling grievances that concerns their brand members with the scope expanding to workers organisations, factories and members of all three schemes. It included in its scope any grievance of a severe nature that applied to the supply chains of any of the brands or members of the schemes.

A second example we explored involves an attempt to set up an industry-wide grievance mechanism by EHI-Retail. Emerging from the context of the recently passed German Supply Chain Due Diligence Act and forthcoming EU-level due diligence requirements, the aim of the initiative is to explore the use of industry-wide solutions in the establishment of a complaint mechanism as required by due diligence legislation. Its aim is to explore and evaluate alternative approaches for an industry-wide grievance mechanism in order to develop an effective and easily accessible industry solution with the participation of supply chain actors, NGOs, social organisations, trade unions and other stakeholders. The development of the planned industry-wide solution will initially be carried out for the fruit and vegetables sector, prioritized by country and, in the first step, for Spain.

These examples of collaboration are real-world partnerships using the power of combined remediation efforts to deliver better outcomes for rightsholders and scheme owners. Collaboration may not always be possible, and some situations may merit a deepening of individual efforts - such as if a scheme is a lone operator in a sector or specific country. However, where multiple schemes operate in similar supply chains and geographic contexts, collaborative remedial efforts could produce numerous benefits.
Remediation and human rights due diligence: considerations for voluntary systems
Remediation and human rights due diligence: considerations for voluntary systems

As policymakers around the world tighten legislation on business accountability on human rights, understanding the links between due diligence and remediation is becoming urgent. Due diligence and remediation are separate but complementary processes. Human rights due diligence is concerned with addressing potential human rights impacts through prevention or mitigation, while remediation is concerned with actual impacts – those that have already occurred.

Both the UNGPs and OECD Guidelines recognize connections between human rights due diligence and remediation efforts. However, companies often fail to recognize the implications of these links – for instance, as regards the ways in which effective grievance mechanisms can support due diligence efforts (e.g., identification of impacts and stakeholder engagement), or how human rights due diligence activities can inform the scope and design of grievance mechanisms that may be needed. These links are even more important to understand as we enter an era of mandatory human rights due diligence and corporate accountability across key jurisdictions. This section shares insights from expert input and our discussions on this topic.
What are the links between human rights due diligence and remediation?

There are important links between business accountability on human rights, due diligence procedures and remediation.

From a due-diligence standpoint, remediation is one of the six key steps of the due diligence process as laid out in the OECD’s Due Diligence Guidance for Responsible Business Conduct (2018). It requires that “When the enterprise identifies that it has caused or contributed to actual adverse impacts, address such impacts by providing for or cooperating in their remediation.” (Step 6 of the OECD Due Diligence Guidance). Although the provision of remedy is not a step in the due diligence process, effective enterprise-level remediation and grievance mechanisms can support due diligence processes and prevent future adverse impacts.

From a human rights and business accountability standpoint, Pillar II of the UNGPs - the Corporate Responsibility to Respect Human Rights – sets out the expectation that businesses will carry out human rights due diligence to identify, prevent, mitigate and account for how they will address their adverse human rights impacts (Principles 17 -21 of the UNGPs), as well as the expectation that “Where business enterprises identify that they have caused or contributed to adverse impacts, they should provide for or cooperate in their remediation through legitimate processes.” (Principle 22 of the UNGPs).

The UNGPs also cross-reference due diligence and remediation in its section on Operational-Level Grievance Mechanisms (OLGMs) (Principle 29 Commentary of the UNGPs). The OECD Guidelines stress that effective OLGMs that businesses set up or participate in should help in all stages of human rights due diligence including:

**Identify Impacts**: support the identification of adverse human rights impacts as a part of an enterprise’s ongoing human rights due diligence

**Take Action**: make it possible for grievances, once identified, to be addressed and for adverse impacts to be remediated early and directly by the business enterprise

**Track Response**: ensure grievances are promptly and effectively dealt with, provide meaningful remedy to rightholders and ensure harms do not recur

**Communicate**: share data on grievance handling and remedies publicly to allows others to learn and support transparency in actions.

In short, two important links between human rights due diligence and remediation are:

1. Business responsibility to participate in or cooperate with remediation processes to address actual adverse impacts identified as part of due diligence processes.

2. The use of effective remediation and grievance mechanisms set up by businesses to support due diligence efforts through data sharing, learning and feeding back into mitigation and prevention of adverse impacts.
What are the ways in which due diligence legislation might reference remediation?

The current corporate due diligence policy landscape suggests that there is clear intent around seeking greater accountability from businesses for remediating human rights harms caused as a result of their activities.

Irrespective of what the final text is going to say on remediation in key legislations like the European Union Corporate Sustainability Due Diligence Directive (EU CS3D), we can draw out a few different ways in which such legislation might move the needle on remediation and business accountability.

1. **Ensuring availability of a range of remedial mechanisms:** this pertains to DD legislations requiring that companies establish and maintain adequate mechanisms to accept and resolve complaints raised - such as setting up effective grievance mechanisms themselves or partnering with others that have them in place.

2. **Human Rights Due Diligence Standards requiring remediation:** this pertains to legislations laying down standards or rules for how a business must react when adverse impacts have occurred or complaints to that effect raised – either through neutralising adverse impacts or mitigating their extent or actual remediation of actual adverse impact caused or contributed to by companies.

3. **Human Rights Due Diligence failures leading to imposition of remedy:** this pertains to how due diligence legislation could require remedial action in cases of failure of due diligence. In such an interpretation, due diligence failures can lead to the imposition of remedy either through civil liability or administrative sanctions and penalties.

4. **Extent of remedy provided considered in civil liability or sanctions/penalties on businesses:** a fourth angle could be legislation considering the ‘remedy record’ of a company in cases for determining both the existence of and extent of civil liability against companies for specific cases of proven violation or harms caused. This means that if companies have taken substantial efforts at remediation, they may be able to avoid or limit the extent of any damages imposed.

This suggests that remediation will likely be referenced in emerging mandatory due diligence legislations and that companies will need to start thinking through how best to meet such requirements – either themselves or in partnership with others.

Irrespective of where the bar is set on remediation in these new laws, the key take-aways are that:

- To comply with emerging due diligence legislations, companies will need to establish or participate in some sort of grievance mechanism.
- Where companies identify that they caused or contributed to harm, legitimate remediation efforts will lead to numerous benefits – both for those impacted and companies this Directive applies to. Therefore, serious efforts at remediation should lower the legal risk faced by companies.
**What do voluntary sustainability systems need to think about in the context of due diligence and remediation?**

Voluntary sustainability systems can play a strong role in supporting implementation of emerging due diligence legislations in a range of ways.

Given the strong likelihood that due diligence laws will include remediation, sustainability systems can get ahead of the curve and think through the following questions specifically on remediation, due diligence and the role their scheme can play.

- Mandate and accountability level of their system with respect to remediation in relation to relevant human rights risks and harms in its areas of operation.

- Specific role/s the system plays both in *procedural* remedy by improving access to remedy and in the provision of or facilitation of *substantive* remedy outcomes.

- Scope and effectiveness of their scheme-level grievance mechanisms and synergies with company-level grievance mechanisms.

- Requirements in their standards on operational-level grievance mechanisms and any other remedy-related provisions that may overlap with the scope of due diligence laws and requirements on company supply chains.

- Local legal and judicial regimes as applicable to their sectors of operation and as relevant for rightsholders raising grievances in relation to human rights harms caused by business activity.

- Scope for partnering and collaborating both with other schemes in similar areas of operation and companies to set up joint grievance mechanisms that can effectively address grievances related to human rights.

Finally, ISEAL’s revised integrated Code of Good Practice, which will become the basis for ISEAL Code-Compliant members in the future, now includes a specific requirement on the scheme’s intended role in corporate due diligence and remediation. This is an important step in helping ISEAL Code-Compliant members think ahead on the role of their schemes in remedying human rights harms and supporting corporate due diligence more generally.

<table>
<thead>
<tr>
<th>Intended role in corporate due diligence</th>
<th>The scheme owner has defined the role it intends the scheme to play in corporate due diligence</th>
<th>The scheme owner decides how its scheme is intended to support corporate sustainability due diligence and publicly documents the specific supporting roles it intends to play.</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>As part of this decision, the scheme owner determines what role it intends to play, if any, in the remediation of adverse impacts on human rights or environmental issues identified through implementation of its scheme, e.g., through auditing or monitoring.</td>
<td>[Guidance: By publicly documenting how the scheme can be used by companies to support their due diligence responsibilities, the scheme owner is providing clarity on the extent and limitations of its role. The scheme can choose to play no role in due diligence but should still define and document this decision.]</td>
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*ISEAL’s revised integrated Code of Good Practice*
Whilst it is clear that the new laws on due diligence will increase scrutiny of company actions on human rights it is not clear if due diligence processes will in themselves improve remedy outcomes for rightsholders in significant ways. Concerns have been raised by experts around limitations in the scope of human rights impacts or harms referenced in due diligence legislations in contrast to the expansive and full spectrum of human rights referenced in the UNGPs. There are also concerns that implementation of a due diligence approach may reduce remedy to a one-off tick-box exercise by companies and fail to address power imbalances and common barriers to remedy such as in relation to unfair burdens of proof, lack of access to lawyers, the costs of litigation, and the inability to use optout class action lawsuits. There is also dialogue around the need to build the capacity of State institutions so that they are strong enough to implement these regulations and properly address cross-border cases.

Ultimately, it needs to be recognised that, even though they can be mutually reinforcing, due diligence and remediation serve different purposes. Voluntary sustainability schemes that seek to actively address remediation in relation to human rights harms should consider remediation processes in their own right and not only as a subset of due diligence activities that they support. But where schemes are actively evaluating their role in supporting corporate due diligence, defining a clear role on remediation will be an added advantage.
Conclusion


A growing number of sustainability standards and schemes are deepening their focus on human rights and advancing social sustainability within supply chains. Simultaneously, mandatory human rights due diligence laws and policies to tackle forced labour and other violations are gathering momentum. In this context, this work by ISEAL aimed at understanding the role that sustainability standards and ISEAL members in specific could play in the remediation and human rights landscape.

Our main insight is that voluntary tools can play a strong and constructive role in the remedy ecosystem and improve access to remedy and facilitate substantive remedy in important ways. Guidance from OHCHR and practical experiences from multistakeholder initiatives within and outside the ISEAL community demonstrate how such tools can advance access to remedy through effective grievance mechanisms but also carve out a role as remedy enablers in providing substantive remedy. Further, ISEAL member schemes already have mechanisms to do this and strengthening these mechanisms will go a long way in advancing human rights in their sectors of operation. The scope for system improvement is clear and our report documents measures that schemes can and are taking to strengthen mechanisms, deepen partnerships and explore collaborative solutions to remediation.

We also recognise that more progress and thinking is taking place around access to remedy and that many challenges and unknowns remain on the role that such tools can play in delivering substantive remedy on the ground. But a key learning from our discussions is that there is a spectrum of engagement and a range of roles that sustainability standards can play on substantive remedy as well.

As policymakers tighten measures on corporate due diligence, this is an opportune moment for voluntary standards who are unsure about their role in remediation to consider and clarify what role they could play through independent efforts or support company action on due diligence and remediation. There is significant scope for efforts from such schemes to improve business accountability for harms caused, strengthen learning to prevent further harms from occurring and ultimately support remedy and reparations for those who continue to face adverse effects of business activities.

In summary, here are the key messages we would like to leave readers with on the role that sustainability standards can play in advancing remediation efforts for business-related human rights abuses.

- Voluntary sustainability systems can advance remediation of supply chain human rights abuses in a range of ways.
- Establishing effective grievance mechanisms either at the scheme-level or using standards to require this of clients or certified entities are key ways to improve access to remedy.
- Delivering substantive remedy is challenging and while many schemes may be unable to provide effective remedies to human rights harms on their own and in all cases, they can still make an important and vital contribution as remedy enablers.
- Schemes can leverage their multistakeholder set-up and access to data to improve assessment of type and range of harms and prevent such harms from recurring through mitigation.
- While individual action is encouraged, there is clear scope for exploring collaborative solutions among schemes working in the same sectors and regions.

Conclusion
Annex:
Details of ISEAL Member Dialogues on remediation
## Annex:
Details of ISEAL Member Dialogues on remediation

**Note:** links to recordings are accessible only for members of the ISEAL Community

<table>
<thead>
<tr>
<th>No.</th>
<th>Topic</th>
<th>Speakers</th>
</tr>
</thead>
</table>
| 1   | Understanding the fundamentals of remediation in the context of human rights protection (November 2021) | - Benjamin Shea, UN OHCHR ARP team  
- Jennifer Zerk, legal consultant, UN OHCHR ARP team  
- Celine Orthlieb (Bonsucro)  
- Silvia Mera, Goodweave International  
- Prasad Vijayan, Roundtable on Sustainable Palm Oil |
| 2   | Effective grievance mechanisms: understanding the UNGPs effectiveness criteria (June 2022)    | - Benjamin Shea, UN Accountability and Remedy Project  
- Rafael Seixas, Membership Manager, Bonsucro  
- Henk Gilhuis, Manager Research and Impacts, Rainforest Alliance |
| 3   | Identifying roles and responsibilities in remediation efforts (September 2022)    | - Jennifer Zerk, legal consultant, UN OHCHR ARP team  
- C K Nandakumar, Senior Advocate at the High Court of Karnataka, India  
- Archana Kotecha, Founder and CEO of The Remedy Project. |
| 4   | Building effective grievance mechanisms for a sustainability system (November 2022)  | - Jennifer Zerk, legal consultant, UN OHCHR ARP team  
- Andreaa Cojanu Davidou, General Manager, Standards, Assurance & Certification (RJC)  
- Oluyemisi Oloruntuyi, Head, Social Policy (MSC)  
- Pravin Rajandran, Head of Grievance Unit (RSPO) |
| 5   | Operational or site-level grievance mechanisms: standard requirements and auditing challenges (February 2023) | - Leopold v. Carlowitz (GIZ, Consultant for Aluminium Stewardship Initiative),  
- Salem Jones (Forest Stewardship Council),  
- Franzis Wimmer (AMFORI) and Laura Wauters (AMFORI) |
| 6   | Facilitating remedy and resolving grievances: working through partnerships (April 2023)  | - Jennifer Zerk, legal consultant, UN OHCHR ARP team  
- Archana Kotecha, Founder and CEO of The Remedy Project.  
- Zümrüt Aydin, Programme Manager for Europe and the Middle East, Fair Labour Association  
- Burcu Kuğu, Program Director, Agriculture and Supply Chain Innovation, Fair Labour Association |
| 7   | The challenge of financing remediation: how to channel and raise funds to repair human rights abuses (May 2023) | - Hannah Bruce, Head of Global Partnerships,  
- ETI  
- Dr Karl Mackie, Senior Mediator and Founder President, CEDR |
| 8   | Strengthening collaboration to advance remediation in response to human rights violations in supply chains (July 2023) | - Suhasini Singh, Head of Supply Chain Engagement, Fair Wear Foundation  
- Kristian Moeller, EHI Retail Institute  
- Jennifer Zerk, OHCHR |
| 9   | The role of multi stakeholder initiatives in advancing action on remediation and links to due diligence (September 2023) | - Benjamin Shea, UN Accountability and Remedy Project  
- Pravin Rajandran, Head of Grievance Unit (RSPO)  
- Henk Gilhuis, Manager Research and Impacts, Rainforest Alliance |
Overview of ISEAL Member Dialogue Series on Remediation.

The fundamentals of remediation (Nov 2021)

Resolving grievances: working through partnerships

Financing remediation efforts

Identifying roles and responsibilities in remediation efforts

Operational or site-level GMs: standard requirements and auditing challenges

Strengthening collaboration to advance remediation

Understanding the UNGPs Effectiveness Criteria for GMs

Building effective GMs for a sustainability system

Remediation and due diligence (September 2023)