



RESPONSIBLE
JEWELRY
COUNCIL

COP 6

Human Rights Implementation Toolkit

AUGUST 2022



CODE
OF
PRACTICES



Our vision is a responsible worldwide supply chain that promotes trust in the global jewellery and watch industry.

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INTRODUCTION

Respecting human rights

This toolkit has been developed to help member companies fulfil the minimum requirements of COP 6 Human Rights and support them in implementing human rights due diligence (HRDD) with a focus on areas of particular relevance to the jewellery industry.

COP 6. HUMAN RIGHTS

6.1 Members shall respect human rights by considering all potential and actual impacts in their operations and business relationships. They shall also commit to, and implement, the UN Guiding Principles on Business and Human Rights as appropriate to their size and circumstances. As a minimum, members shall:

Have a policy commitment, endorsed at the highest level of their organisation, to respect human rights within their operations and business relationships, and procedures for implementing the policy in alignment with COP 2 Policy and Implementation.

Have a human rights due diligence process to identify, prevent, mitigate and account for adverse human rights impacts that are connected to their business.

Provide for, or support legitimate processes to enable, the remedy of any adverse human rights impacts that they have caused, contributed to or been linked with.

Communicate annually with stakeholders about their human rights due diligence efforts and remedy activities in accordance with COP 3 Reporting.

WHAT ARE HUMAN RIGHTS?

Human rights are the universal rights and freedoms that belong to all people without discrimination. As a minimum, the RJC understands human rights to mean those rights articulated in the International Bill of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and applicable law.

Labour rights and working conditions are an important set of human rights covered by the RJC Code of Practices. For comprehensive background information about RJC's provisions in this area, review the [RJC COP Guidance](#), in particular COP provisions 15 to 22 on Labour Rights and Working Conditions and COP 23 Health and Safety.

WHAT IS HUMAN RIGHTS DUE DILIGENCE?

The [UN Guiding Principles on Business and Human Rights](#) (UN Guiding Principles or UNGPs) stipulate that businesses have a responsibility to respect human rights and [introduce human rights due diligence](#) as the process to fulfil this responsibility. HRDD is a continuous management system to identify, prevent, mitigate and account for potential and actual impacts of a company's business activities on the human rights of individuals and communities.

While the HRDD process resembles that of traditional risk management approaches, it differs from these in that its focus is on risks to people, rather than just on risks to business.

Your HRDD will necessarily vary in complexity, depending on your company's size, the risk of severe human rights impacts and the nature and context of your operations. But in all cases, it will need to include four steps:



Assessing actual and potential human rights impacts



Integrating and responding to the findings



Tracking actions



Communicating how impacts are addressed

For more details on HRDD and how it relates to RJC members, [see RJC COP Guidance for provision 6.1.](#) For detailed implementation guidance, see Step 2 – Have a human rights due diligence process (COP 6.1b) in this toolkit.

SCOPE OF THE TOOLKIT

COP 6 addresses general expectations, and is designed to help members integrate the UNGPs into their operations and supply chain practices.

OECD Guidelines for Multinational Enterprises

In relation to human rights, the [OECD Guidelines for Multinational Enterprises](#) (and the related OECD Due Diligence Guidance for Responsible Business Conduct) build on the UNGPs and its concept of human rights due diligence. Recognising that the OECD Guidelines and UNGPs are aligned, this toolkit refers primarily to the UNGPs.

Supply chains vs. value chains

According to the UNGPs, the business responsibility to respect human rights encompasses its own operations and business relationships, explicitly encompassing relationships with public and private entities in its value chain. Considering the particular human rights risks of the jewellery industry, this toolkit refers primarily to the term 'supply chain'. However, companies using the toolkit are, as needed and feasible, encouraged to adapt the scope of their HRDD to encompass the broader value chain. This might include commercial customers, service providers and other business partners that form part of your business process.

About the COP 6 Implementation Toolkit

This toolkit aims to help RJC members in the implementation of COP 6, supporting members in complying with the minimum requirements of COP 6 and in strengthening their human rights efforts more broadly. It provides guidance and outlines a practical set of tools including templates, forms, and checklists to simplify the human rights due diligence process as much as possible, particularly for small businesses. The use of the tools is not mandatory, and members should adapt and tailor them to match their own business contexts, as and where needed.



Part 1 – Define Objective and Scope

Part 1 of the toolkit is for members to provide context information including the scope, area, assumptions and limitations associated with the human rights due diligence.



Part 2 – Conduct Human Rights Due Diligence

Part 2 mirrors the four requirements of COP 6. Each section lists the sub-steps of the requirements, briefly describes the task at hand and provides useful tools to conduct the human rights due diligence. Step 1 covers COP 6.1a (Human Rights policy commitment and governance), Step 2 encompasses COP 6.1b (Human rights due diligence), COP 6.1c (Remedy), and COP 6.1d (Communication).



Part 3 – COP 6 Improvement Plan

With **Part 3**, companies can identify and document activities they need to undertake on their journey towards RJC certification or more generally to further strengthen their human rights efforts.

The toolkit provides different tools to assist you on your journey. There are four types of tools which you can easily identify by their respective icon.



Checklists are designed as self-assessment questions to help you benchmark your company's current human rights practices against international standards, RJC requirements and best practice.



Activities such as mapping exercises are suggested to work collaboratively on your HRDD steps, although they can also be carried out individually.



Templates of documents, tables and figures are designed to help you create your policies, complete HRDD steps, document findings or communicate them.



Helpful knowledge and resources are provided to support you in thinking about certain topics, informing your research or carrying out specific activities.



Additionally, when you see this icon, click on the [underlined text](#) to be redirected to useful resources.

How to use this toolkit

Implementing HRDD, especially across several supply chain tiers, can take time, sometimes even years. Members and auditors should view HRDD as a process of continual improvement.

Members will find that the time required to implement HRDD will vary based on their company structure, supply chain complexity, risk profile and human resource capacity. Hence this toolkit has been designed to give you flexibility in the way you apply it to your company. You can use this toolkit in two ways:

The **first option** starts with assessing your existing HRDD process, where you will focus on completing the checklists listed below. Designed as self-assessment tools, these checklists will provide you with a good understanding of your current status in a fairly short amount of time. Once you have completed the checklists, you will move to Part 3 and complete the COP 6 Improvement Plan based on your answers. Any unticked item essentially represents a gap or outstanding step that you will need to prioritise and address to fulfil the minimum requirements of COP 6.

Option 1 – Tools to assess your current status and identify next steps

- Tool 1.1.A – Establish a human rights policy commitment (checklist)
- Tool 1.2.A – Establish your HRDD management system (checklist)
- Tool 2.1.A – Identify and assess your human rights impacts (checklist)
- Tool 2.2.A – Integrate priority issues (checklist)
- Tool 2.3.A – Assess your tracking activities (checklist)
- Tool 2.4.A – Build your communication strategy (checklist)
- Tool 3.A – Embedding grievance mechanisms (checklist)

Use the findings in these checklists to inform your COP 6 Improvement Plan

- Part 3 – Create your COP 6 Improvement Plan

The **second option** allows you to carry out your HRDD step-by-step and to address gaps as they arise. To do so, follow the full process as outlined in Part 1 and Part 2 in detail, using the tools when necessary. Once you have completed all steps, you are ready to complete Part 3 to identify any gap or outstanding action that you will need to prioritise and address as part of your COP 6 Improvement Plan.

When to use this toolkit

For RJC members, in particular smaller businesses, we suggest using this toolkit and conducting your due diligence for COP 6 Human Rights, [COP 7](#) Due diligence for responsible sourcing from conflict-affected and high risk areas and [COP 12](#) Know your counterparty: Money laundering and finance of terrorism at the same time.

HRDD is a continuous system to manage risks and impacts of business activity on the rights of people and communities. Human rights situations are dynamic, therefore carrying out HRDD, especially assessing human rights risks, should be repeated regularly as well as on an ad-hoc basis whenever there are changes to your business or in the impacts of your business partners.

Reasons for reviewing your HRDD include:

- Prior to new projects or business relationships that may have negative human rights impacts (e.g. contracting suppliers in high risk countries);
- Prior to major changes in business operations (e.g. entering a new market, introducing new products or services);
- In response to or anticipation of changes in the operating context (e.g. conflict, social movements, extreme events such as natural catastrophes, economic crisis, etc.);
- In response to requests for assessments by business partners, investors, or regulators; and
- In response to concerns or allegations of human rights violations being reported by stakeholders, NGOs, media or other sources.

DATA SHARING – CONFIDENTIALITY & AGGREGATION

There are several points within this toolkit that require you to gather information and share this information with your customers and/or suppliers. The data shared must be sufficient to allow your customers and suppliers to conduct their own due diligence, ensuring that the materials that they are purchasing/supplying as well as the suppliers and supply chains they have engaged with have not contributed to serious human rights abuses or a conflict affected or high-risk area. Data sharing requirements may vary depending on your own circumstances.

Data sharing can be done on an aggregated and/or confidential basis and should not impact your business relationships. Members should strive to be as open and transparent as possible, and the sharing of data should be a key component of this approach.



This guidance will help companies ensure respect for human rights in their operations and supply chains, strengthening the company's relationships with stakeholders and enabling greater contribution to sustainable development.



PART 1 – DEFINE OBJECTIVE AND SCOPE OF YOUR HRDD

Provide the background context including the scope, area, assumptions and limitations associated with your human rights due diligence.

Member name		
Date		
Responsible person (for signing off the review)		
Member sector (select all relevant sectors for your business)	Diamond, coloured gemstone, silver, gold and/or platinum group metals	Jewellery manufacturer
	Silver, gold and/or platinum group metals trader, refiner or hedger	Jewellery retailer
	Diamond and/or coloured gemstone trader, cutter or polisher	Service industry
	Wholesaler	Other (please specify here):
Objective of the human rights due diligence (select all that apply)	First HRDD to identify key human rights risks and impacts	Other (please specify here):
	Regular review and update of HRDD	
	Review triggered by new risk or by change to business/activities	





PART 2 – IMPLEMENT YOUR RESPONSIBILITY TO RESPECT HUMAN RIGHTS

Step 1 – Have a policy commitment (COP 6.1a)

1.1. COMMIT

As an RJC member, you must have a policy that commits your business to respecting human rights within your own operations and business relationships, and procedures for implementing the policy. Your policy commitment can be a stand-alone statement or integrated in your broader company policy, and must be:

- endorsed at the highest level of your organisation;
- clear on expectations of employees, business units, suppliers and subcontractors to ensure everyone understands their role in delivering the policy;
- publicly available; and
- proactively communicated to your relevant stakeholders.

If you are developing a human rights policy for the first time, a stand-alone statement is a great opportunity to set out your company's intentions while you build internal knowledge and capabilities.

Significant efficiencies can be gained by integrating your policy and processes into your overall management systems and you should look at ways of doing this at each step. For example, if your company already has codes of conduct in place across its operations and supply chain, you should consider integrating your human rights commitments within existing standards to avoid confusion or duplication.

This section aims to support you in establishing your human rights policy commitment and communicating it effectively to your stakeholders.

List of tools

Tool 1.1.A is a checklist of guiding questions and key action points for establishing and communicating your human rights policy.

Tool 1.1.B is a template for developing such a policy. It has been adapted from Annex II of the OECD Guidance. You should adapt it to meet your business circumstances, as appropriate.

Tool 1.1.C is a basic stakeholder mapping activity to identify who to engage on your policy, what their role is and questions to consider before engaging with them. It can be used when considering other HRDD steps.



Tool 1.1.A – Establish a human rights policy commitment (checklist)

Does your company publicly commit to respect human rights in line with the requirements of the COP Standard?

As a minimum, make sure your policy:

- commits the company to respect internationally recognised human rights set out in the UN Declaration of Human Rights;
- commits the company to implement the UN Guiding Principles on Business and Human Rights or, if applicable, the OECD Guidelines for Multinational Enterprises¹ (the extent will depend on the size and complexity of your business);
- encompasses human rights within its own operations and business relationships, in particular the rights of workers in its supply chain (ILO Core Labour Standards).

Is your human rights policy commitment documented?

The policy must be written down and include an effective date.

- Have you established a process for keeping the policy up to date? (e.g. if there is a change in your sourcing practices, new legislation that applies to your business, etc.)

Is it signed by senior management of your organisation?

Ideally this may be a senior leader within your business (e.g. managing director), but it may also be someone with key responsibilities which relate to human rights such as a procurement or sourcing manager, a legal advisor or counsel, a risk officer, etc. This person should have been delegated clear authority to do this.

Is the human rights policy publicly available?

- Can your policy be easily accessed by all interested parties? (e.g. business partners, consumers, other external stakeholders)

If you don't have a website, share your policy with your business partners.

¹The OECD Guidelines for Multinational Enterprises are recommendations for multinational enterprises operating in or from OECD countries.

Have you communicated the policy internally?

- Have all employees been made aware of the policy and your commitments?
- Do employees working with suppliers and buyers have access to it?
- Have you ensured all employees with a direct connection to human rights (e.g. procurement, security, human resources, etc.) understand what the policy means for their role?
- Have you rolled out any training to these employees?

Have you referenced the human rights policy in supplier codes of conduct, contracts or agreements?

- If not, have you sent your policy to all your business partners?

You should ask them to sign it or give their acknowledgement in writing.

- Have you taken additional steps with your key business partners?

If you have many business partners, focus on your most significant relationships. Check COP 5 Business Partners in the [RJC COP Guidance](#) for actions you can take.

Have you checked that all your business partners understand what the policy means for them?

It is vital that all partners, and those particularly key to your business, understand what the policy is about and what it means for them.

- Have you explained to your business partners what the policy is? Ideally over the phone or virtual/in-person meeting.
- Have you explained to your business partners what they can do to support the implementation of the policy? For example, by encouraging them to be open and transparent about any concerns or suspicions they may have regarding any human rights issues.

Use Tool 1.1.C – Stakeholder mapping (activity and template) to support you with engaging key partners and tailor your approach.



Tool 1.1.B – Human rights policy (template)

This tool provides a framework for developing your human rights policy. The template includes suggestions for each section of the policy document. You should adapt it to suit your circumstances and consider integrating these elements into other relevant policies to ensure they are embedded into normal operations.

Tip

Use practical, clear and concise language in your policy so the context and issues are easy to understand for colleagues and business partners.

Follow the link to [access Tool 1.1.B – Human rights policy \(template\)](#).



Tool 1.1.C. – Stakeholder mapping (activity and template)

Identifying the key stakeholders at this early stage enables you to map them according to their respective role and responsibilities in relation to your human rights policy and governance. These may be a person or a team representing a particular function or department within your business, or an external stakeholder such as a business partner or service provider.

This information will be useful again at later stages of the Human Rights Due Diligence process.

Tool 1.1.C combines:

- i. a mapping activity which you can carry out individually or as part of a workshop with colleagues, and
- ii. a template for mapping stakeholders using four categories: Responsible, Accountable, Onboard, and Informed.

Follow the link [to access Tool 1.1.C – Stakeholder mapping \(activity and template\)](#)

Once you have completed the stakeholder mapping, and before engaging with them, consider the following key questions

1. What level of understanding do your stakeholders currently have on this topic? Is there a way that you can help them to understand in more depth? Or can you work together to get more information?
2. What potential sensitivities might your stakeholders have? Are there any cultural considerations to be mindful of? If unsure, how can you anticipate them and respond to these?
3. What are the key messages for different stakeholders?
4. What methods do you have to engage stakeholders? (e.g. in-person meetings, one-to-one conversations, virtual Q&A).
5. How can you build mutual understanding and ownership of this agenda? What can you offer/give/help them with?
6. What are your desired outcomes of the conversation? What next steps would you expect from the conversation?

1.2. EMBED

Overall responsibility and ownership of the policy should be clearly allocated so that the day-to-day responsibility for human rights is clear within your business and among stakeholders.

This section assists you in embedding responsibility for human rights in your business, and establishing a management system to support your Human Rights Due Diligence process.

List of tools

Tool 1.2.A is a checklist to help you establish a Human Rights Due Diligence management system.



Tool 1.1.A – Establish a human rights policy commitment (checklist)

Is responsibility for managing human rights issues clearly assigned to specific business functions or staff positions across the business?

Consider which function(s) (e.g. legal, ethics and compliance, sustainability, procurement, HR) or position(s) within the function have day-to-day responsibility for managing human rights issues and what their responsibilities consist of. Ensure that these positions have a functional reporting line to the most senior level and that they report progress and outcomes to the company's board of directors.

- Have you established KPIs in relation to the implementation of the company's human rights policy?
 - Does the company's board of directors regularly review the company's human rights due diligence performance? This can be done together with reviewing responsible business practices more generally.
-

Have you appointed a senior staff member to lead the Human Rights Due Diligence process?

This person will be accountable for the human rights due diligence process and must be able to convene staff from across the company.

- Do they have the competence, knowledge and experience to be responsible for implementing your Human Rights Due Diligence process?
-

Have resources been made available to support the HRDD process?

You will need to assign the responsibility for the HRDD process. It should include staff responsible for key functions (e.g. purchasing, finance, legal, compliance, quality). Ensure that these staff members have the time to devote to the relevant activities. If you have the budget, consider hiring external expertise to support you.

- Have you identified all relevant staff members to involve?
 - Have you established a clear communication process to help coordinate efforts?
-

Have all relevant staff been trained on human rights due diligence?

Staff responsible for the HRDD process and any other relevant staff will benefit from receiving training on the basics of human rights due diligence.

If you don't have the capacity to develop a training, we recommend looking at The Business & Human Rights Resource Centre's [running list of events](#), which includes free courses which anyone interested can attend.

Have internal processes and procedures been reviewed and updated?

Each person responsible for supporting the HRDD process must carry out a review of all processes and procedures within their function and identify gaps.

- Have you reviewed and, where necessary updated, all processes and procedures identified?
 - Have all changes been communicated internally?
-

Have processes been set up to communicate internally about HRDD?

You will need to establish a process to report findings of your human rights due diligence process to the appointed senior staff member.

- Have you communicated internally what this process is?
 - Are you regularly reviewing this process to identify opportunities for improvements?
 - Do you have a process in the event that findings are not communicated? Are the implications clear and have they been communicated?
-

Step 2 – Have a human rights due diligence process (COP 6.1b)

A human rights due diligence process is essentially a set of management systems that enables a company to identify, prevent, mitigate and account for adverse human rights impacts and risks that are connected to its business activities and business relationships. It should include:

- a review to identify and assess human rights impacts and risks (section 2.1.);
- a strategy to prevent or mitigate risks and action plan to respond to identified impacts (section 2.2.);
- an ongoing monitoring and evaluation of efforts to address risks (section 2.3); and
- communication channels to share your actions progress and outcomes with stakeholders (section 2.4).



2.1. ASSESS

Carrying out human rights due diligence starts with understanding how your company’s activities and business relationships may pose risks to human rights – that is, risks to people – and identifying areas where the risk of adverse impacts is most significant.

This section aims to support you in **identifying and prioritising** your salient human rights issues within your operations and supply chains. You can use [RJC COP Guidance](#) section COP 6.1B for additional advice.

As you build your knowledge and capabilities over time, you will likely gain more insights into your salient human rights issues as well as actual adverse impacts which will need to be addressed (see section 2.2 Integrate and Respond, and Step 3 – Provide for or support remedy (6.1c)).

Key terms

Salient human rights issues: Human rights that stand out because they are at risk of the most severe negative impact, through the company's activities or business relationships. The concept of saliency focuses on potential impacts that are most severe (in scale and scope), potential (likely to have occurred or be occurring in the future), negative (causing harm) and human rights focused (by posing a risk to people).

Potentially affected stakeholders: Also referred to as rightsholders, these are individuals or communities directly or indirectly impacted by business activities, or by individual or organisations acting on their behalf. In line with the UNGPs, human rights assessment should take adequate account of the perspectives of these stakeholder groups or their legitimate representatives.

Leverage: The ability of a business enterprise to effect change in the practices of another party that is causing or contributing to an adverse human rights impact.

Credible proxies: Referred to in the UNGPs as individuals or groups who work with affected stakeholders and have direct insights into their perspectives (e.g. local organisations, Non-Governmental Organisations (NGO), local consultants, or trade unions) that do not directly represent the workers in question, but have good insight into local human rights risks and systemic issues.

List of tools

Identifying salient human rights issues

Tool 2.1.A is a general checklist covering key steps to identify and prioritise issues.

Tool 2.1.B is a set of tools to help you increase visibility of your supply chain:

Tool 2.1.B.1 is a focused checklist to help you identify knowledge gaps regarding your supply chain.

Tool 2.1.B.2 is a team activity and information request guide to help you map these knowledge gaps and identify ways to fill the gaps.

Tool 2.1.C is a list of useful sources to carry research on salient human rights issues.

Prioritising salient human rights issues

Tool 2.1.D is a template to register your risks and impacts and help you prioritise.



IDENTIFYING SALIENT HUMAN RIGHTS ISSUES

Tool 2.1.A – Identify and assess your human rights impacts (checklist)

Have you mapped your supply chain?

If unsure, use Tool 2.1.B.1 – Know your supply chain (checklist) and Tool 2.1.B.2 – Know your supply chain (team activity & information request guide) to map your supply chain and identify any knowledge gaps.

If you are lacking visibility of lower supply chain tiers, use Tool 2.1.B.2 – Know your supply chain (team activity & information request guide) to help you gather information about these tiers.

If applicable, map your value chain using the tools provided.

Have you identified significant business relationships?

These are major customers or suppliers. They have a key role to play in supporting your commitment to human rights. You are also likely to have influence or leverage over them.

Have you looked out for risks specific to your sourcing regions and industry context?

- Have you identified specific human rights that are recognised as being most at risk in a particular country context?
- Have you identified specific human rights that are recognised as being most at risk in a particular region within the country?
- Have you identified specific human rights that are recognised as being most at risk in your industry context?

Consult the country indices in Tool 2.1.C – Identifying salient human rights issues (helpful resource) to inform your research on human rights risks by countries.

Have you been able to reasonably review all your business relationships?

- If not, have you identified where the greatest risk areas across your business relationships are, and have you undertaken due diligence regarding these risks?
-

Have you established the level and nature of risks in relation to all your significant business relationships?

For further guidance on this, refer to [RJC COP Guidance](#) page 34 Table 5.1. and to the sections and tools on Identifying (page onwards) and Prioritising salient human rights issues (page onwards).

Have you engaged relevant internal stakeholders?

- Have you identified which business functions may regularly encounter human rights impacts and risks (e.g. security, human resources, procurement, etc.)?

If you have a risk management function or expert, make sure to involve them to provide input and integrate human rights into existing risk management process.

Have you engaged with potentially affected stakeholders/rightsholders?

Individuals working in your supply chain are likely to be impacted by your activities in one way or another, so this group is a good starting point.

- Are you able to allocate sufficient resources to research stakeholder groups and develop an engagement approach?
 - Have you identified group representatives with whom you can engage and overcome barriers? (e.g. language, culture, vulnerability, level of literacy, level of trust, etc.)
 - Have you considered potential third-parties (e.g. auditor) who can support you with identifying and reaching relevant representatives?
 - Have you identified how to engage with stakeholder representatives?
-

If you haven't been able to engage potentially affected stakeholders/rightsholders, have you considered engaging with credible proxies?

- Have you identified credible proxies to engage?
 - Are you able to allocate sufficient resource to research relevant credible proxies to engage?
-

Have you established a focused set of issues to prioritise action on?

You should start your HRDD in a targeted way, prioritising particular countries or parts of the business. You will be able to build learning about how to assess and prioritise risks, and, over time, expand the scope to cover the company's entire operations and supply chain.

Use Tool 2.1.D – Risk register to support you in prioritising your risks



Tool 2.1.B.1 – Know your supply chain (checklist)

Supply chains can be very complex and opaque, so it is important to gain as much visibility as possible of what your supply chain looks like before you start identifying your salient human rights issues.

Use this checklist to assess how much you know about your supply chain. If your answers are mostly negative, use Tool 2.1.B.2 – Know your supply chain (team activity & information request guide) to identify your knowledge gaps. This can be integrated with the other information you are requesting as part of your Know Your Counterparty processes.

Do you know the name and addresses of your immediate (Tier 1) suppliers?

Do you know the name and addresses of the production sites where your purchase orders are fulfilled?

If your Tier 1 suppliers have multiple production sites, it is important to know which exact site(s) fulfils your orders.

Do you know what processes your Tier 1 suppliers are performing on their sites?

- Have you verified that your suppliers have the capabilities (i.e. equipment and skilled workers) to perform these processes on site, for example when visiting their facilities?
-

Do you know if any processes integral to production may take place outside of your Tier 1 suppliers' production sites?

- If so, do you have the name and addresses of where the processing site is and who owns the unit?
-

Do your Tier 1 suppliers systematically inform you if and when they have to sub-contract production to another supplier?

- If so, do they systematically disclose the name and address of the supplier(s) performing the work and where production takes place?

If you are not aware of any sub-contracting or if you are unsure, ask your suppliers, preferably over a meeting rather than over email so you can ask more questions if they advise that they sub-contract any part of the production.

Do you know the name and addresses of your Tier 2 suppliers?

(i.e. the suppliers who provide the necessary materials and components to your Tier 1 suppliers).

Do you know the name and addresses of your suppliers beyond Tier 2?

(e.g. sites where raw materials are extracted, transformed, etc. before being sold to your suppliers).



Tool 2.1.B.2 – Know your supply chain (team activity & template)

The team activity will help you increase visibility over your supply chain and identify any knowledge gaps. For the activity, you should involve sourcing and product team members and/or staff members responsible for the HRDD process.

Access the detailed description of the team activity *Tool 2.1.B.2 – Know your supply chain (team activity & template)*.

Additionally, use the following guide to gather information from suppliers and further increase visibility of your supply chain. Feel free to adapt it to suit your circumstances and materials.

You may ask your Tier 1 suppliers for this information verbally, but make sure you keep written or electronic records of relevant meetings or telephone conversations. You may also ask Tier 1 suppliers to request the same information from their own suppliers – and so on and so forth – so you can increase visibility of your lower supply chain tiers, beyond Tier 1. If your suppliers are reluctant to provide this information you should try to find out why. This may be because they are concerned about confidentiality or losing a commercial advantage. You can offer to establish a Non-Disclosure Agreement or provide other reassurances to get access to this information.

The accuracy of the information should be checked at least annually for suppliers.

To go further

Once you have completed the mapping of your Tier 1 supply chain, you may map all lower tiers using the same approach. You may want to ask your Tier 1 suppliers to request the information outlined in this tool from their suppliers, so that you can increase visibility of your Tier 2 suppliers.

Information request guide

The table below shows example documentations to request from existing suppliers and collect from new suppliers or partners prior to starting a business relationship. For existing suppliers, the information should be regularly updated

Supplier details

- Overview of the business and ownership structure
- List of all production sites/units, including name and address
- List of external production sites/units where production may occasionally be sub-contracted
- Code of Conduct/Integrity policy documentation

Evidence of HRDD carried out

- Overview of processes and procedures to manage human rights risks or impacts on site (e.g. H&S, working hours, discrimination, etc.)
- Risk assessment documentation for each owned units and, if any, sub-contracted units
- Evidence of social compliance audits carried out for owned units and, if any, sub-contracted units
- Evidence of Corrective Action Plans (CAPs) issued for owned units and, if any, sub-contracted units together with evidence of actions completed
- Evidence of supplier participation in relevant industry programmes and initiatives

Source of product components/materials

- List of producing companies, including name, address, parent company, and where components/materials originate
- Any certificates in relation to these components/materials



Tool 2.1.C – Identifying and assessing salient human rights issues (helpful resource)

This tool will guide your research into your business’ salient human rights issues. There are essentially four key sources you should activate for your research:

Internal stakeholder interviews & data

Functions related to human rights, such as Human Resources, Procurement, Sourcing, Quality, HSE or Compliance may give you insights into human rights risks.

Internal data can also be a good starting point to identify risks, such as sourcing countries, commodity lists, audit results, supplier self-assessment or risk assessment, employee survey and statistics, incidents, etc.

- *Suggested next steps:* Identify relevant stakeholders and organise one-to-one or group interviews. Explore existing databases, data points available, and discuss with relevant colleagues the salient human rights issues (or “red flags”) you identify.

Desk research

Reports from companies, NGOs, government bodies or media can be very useful sources of information to help you gain insights into your operating/sourcing country contexts.

- *Suggested next steps:* See what your peers and competitors are reporting by searching the company name + “CSR report”/“Sustainability report”/“Human rights”/“Ethical Code of Conduct”. Search reports by searching sector name + “country” + key terms such as “human rights”/“environmental issues”/“labour rights” + “report”

External experts

NGOs, international organisations or academics can be worth researching with to gain expert insights into a specific country or issue.

- *Suggested next steps:* Search your sector name + “NGOs” or “academic” or “organisation” + “country” + key terms mentioned previously.

Country indices

Indices and country reports are another great way of learning about a country context and gaining awareness of your operating/sourcing countries’ state of affairs.

- *Suggested next steps:* Research salient human rights issues in your operating and sourcing countries using the following sources of information.



Source	Description
Human Rights Watch Country Reports	Browse countries of interest to get an overview of human rights most at risk based on recent events
Country Reports on Human Practices	The U.S. Department of State publishes annual detailed reports on all countries’ human rights practices.
Rule of Law Index	Provides indication of how the rule of law is experienced and perceived. Compare countries and dive into specific country insights.
Freedom House	Evaluates people’s access to political rights and civil liberties.
Children’s Rights in the Workplace	Explore country-by-country data on children’s rights in the workplace.
ITUC Survey	Find information on violations of workers’ rights in specific countries.
Global Slavery Index	Explore modern slavery risk and prevalence country by country.



PRIORITISING SALIENT HUMAN RIGHTS ISSUES

Your response to your salient human rights issues will depend on (A) your company's relationship to salient human rights issues, (B) the likelihood of risks or impacts to occur, and (C) the severity of these risks and impacts on the rights of people.

Each factor plays a key role in determining what your most significant risks and impacts are. It is most effective to prioritise them to focus your efforts and ensure the most severe and likely risks and impacts, closely related to your business, are managed first.

Factor A: Relationship of your business to risks and impacts

There are three ways your business may be involved with human rights risks and impacts:

Type of involvement	Description
Cause	The risk or impact is caused directly by the company's action. No intermediaries are present between the company and the rightsholder affected/potentially affected. If the company ceased the action, the risk or impact would cease.
Contribution	The company does not alone cause the impact. However, a company's actions encourage, enable, or motivate the human rights harm by or with another.
Linkage	The human rights harm is caused by another party (not the company) with whom the company has a business relationship, and is linked to its own products, operations, or services. The company's action does not appear to encourage, enable or motivate the impact.

Factor B: Likelihood of risks and impacts

There are three levels of likelihood of a risk or impact to occur:

Likelihood	Description
High	Context suggests risk (or impact) <u>is likely</u> to happen (again) AND there are no or ineffective mitigation measures in place.
Medium	Context suggests <u>possibility</u> for risk (or impact) to happen (again) AND there are no or ineffective mitigation measures in place.
Low	Context suggests possibility for risk (or impact) to happen (again) BUT effective mitigation measures are in place.

Factor C: Severity of risks and impacts

There are four levels of severity of a risk or impact:

Parameter	Description
Very high	Catastrophic effect on quality of life for those impacted; not remediable.
High	Severe effect on quality of life for those impacts; not fully remediable.
Medium	Substantial effect on quality of life for those impacted; not easily remediable.
Low	Minor effect on quality of life for those impacted; easily remediated.

Factor D: Context

In addition, the levels of likelihood and severity of risks and impacts may vary based on the context of the business activities. Here are four categories of factors that you should take into consideration when assessing your risks and impacts.

Category	Examples
Nature of the work	Type of labour (dirty, dangerous, difficult), contract type and length, degree of isolation, degree of sector regulation, etc.
Business practices	Awareness of companies regarding human rights issues, buying practices, degree of visibility of supply chain, etc.
Geographical context	Degree of enforcement of labour, civil and environmental regulations, poverty levels, corruption levels, conflict, etc.
Personal circumstances of workers and communities	Gender, ethnicity, migration status, material wealth, literacy, religion, language, etc.



Tool 2.1.D – Risk register (template)

The risk register will help you assess and prioritise your findings. It may also be used to document impacts that have already occurred and help you prioritise your actions in response. It may be completed as part of a workshop with colleagues responsible for the HRDD process, using the following questions as a guide:

- What individuals or groups may be affected?
- Which of their right(s) are threatened?
- What do you know about the risk? Are there any mitigation measures in place?
- How severe would the effect be on the quality of life of those affected (very high, high, medium, or low)?
- Given the context, how likely is the risk to occur? (high, medium, or low)? Are there any mitigation measures in place? If there are, the likelihood may be reduced.
- What is your relationship to the risk (cause, contribute, or linked to)?
- Considering the severity, likelihood, and relationship. How urgently should you respond to this risk?

Follow this link to [complete Tool 2.1.D – Risk register \(template\)](#)

2.2. INTEGRATE AND RESPOND

Integrating the findings of your assessment and addressing them is about deciding on the necessary actions to cease, prevent and mitigate specific negative human rights risks and impacts and ensuring that these are embedded into your business. This process must be repeated as new risks and impacts are identified and will be driven from the person/function responsible for human rights.

In a small enterprise where day-to-day interaction is frequent, integration may occur naturally. Enterprises that lack such ease of interaction will likely require a more systems based approach.

To integrate your assessment findings and respond to your risk and impacts, you will need to:

- Assign responsibility for addressing impacts to the appropriate level and function;
- Ensure the internal decision-making, budgets and oversight enable effective responses to such impacts;
- Define appropriate action depending on the business' relationship to the impacts and the extent of the business' leverage to influence change over these impacts.

This section aims to support you in considering, planning, and taking actions, as well as adjusting those actions over time, based on the risks and impacts you identified in the previous section.

Tool 1.1.C – Stakeholder mapping activity should be used to inform your stakeholder engagement approach, for example when engaging business partners on risks identified related to them.

Note: if you have identified a very high risk in relation to a business partner, review the [RJC COP Guidance](#) on OECD Step 3. in conjunction with the tools offered in this section.

List of tools

Tool 2.2.A. is a general checklist to help you integrate and respond to priority issues. The extent and depth to which you will be able to complete all the steps in this checklist will depend on the size and nature of your business. Smaller companies with less leverage should consider partnering with others to be able to drive change.

Tool 2.2.B. is a template to build your action plan, based on your risk register (section 2.1.)

Tool 2.2.C. is a guided team brainstorm to identify opportunities for leverage in relation to issues associated with third parties (e.g. business partners).



Tool 2.2.A – Embed priority issues (checklist)

Are there clear accountabilities for fulfilling policy commitments on human rights across all areas of the business?

- If not, have you assigned risks/impacts identified to specific functions/staff?

They will be responsible for reviewing existing practices, policies, and processes to identify the root cause of the risk/impact and how to prevent reoccurrence.

Are decision-making processes aligned with the objectives of the human rights policy commitments?

For example, consider whether human rights are considered in the pre-selection of new business partners, suppliers, investment decisions, etc.

Have you developed appropriate actions for each of your prioritised risks and impacts, taking into account the levels of likelihood and severity?

- Have you established a timeframe against each action?
- Have you clearly defined who is responsible for ensuring the action is implemented, and who is accountable for the action taken?
- Have you engaged subject matter experts (internal and/or external) to support the implementation of the action?
- Have you ensured your actions are SMART? (Specific, Measurable, Action-Oriented, Realistic, Time-bound)

If not, go to Tool 2.2.B – Build your action plan to identify appropriate actions to address your risks and impacts.

Is the person responsible for responding to priority risks and impacts adequately trained and supported to do their job well?

Does the accountability for responding to priority risks and impacts extend to the most senior level of your business?

Have you established a structure to enable departments to collaborate on actions?

Have you defined clear internal reporting requirements?

(i.e. what must be documented and by whom, who needs to be informed, and how often reporting should take place).

Have you evaluated your leverage on business partners who are related to a risk or impact?

- Has this evaluation informed your engagement approach and actions in relation to these business partners?
- If leverage is insufficient to effect any change, have you explored other ways to influence your business partners and build leverage?

If not, work with colleagues on Tool 2.2.C – Identify opportunities for leverage (team activity).

Have you considered existing processes into which you could integrate additional steps to assess and address human rights impacts?

(e.g. integrating rightsholder engagement (including employees, supply chain workers or communities) as part of existing processes (e.g. supply chain audits).

Have you considered new processes which you could develop to help you assess and address human rights impacts?

For example, building supplier capacity to undertake human rights due diligence by co-developing with them a self-assessment questionnaire for their own suppliers, as well as minimum requirements that their supply chain partners and any new partners should meet).

Have you thought about ways to engage with others in the industry to collaborate on shared risks and impacts?

(e.g. through RJC membership).



Tool 2.2.B – Build your action plan (template)

Build your action plan by identifying the actions you think your company should take against each of its prioritised issues (see Tool 2.1.D – Risk register), together with the people who are:

- Responsible – the person/people who do the work to complete the action
- Accountable – the person/people who will approve the action taken
- Consulted – the person/people who need to be engaged in the conversations that lead to the completion of the actions (e.g. other internal team members and/or subject matter experts)
- Informed – the person/people who need to be kept up-to-date on the progress of the action

Follow the link to [access Tool 2.2.B – Build your action plan \(template\)](#).

Tips

If some of your prioritised issues are related to business partners, use Tool 2.2.C – Identify opportunities for leverage (team activity) in conjunction with this tool.

If more information is needed about an issue before you can define an appropriate action, establish a time-bound plan to investigate the issue and engage relevant internal and external stakeholders to help you formulate an action. Look at whether this issue is repeated either across multiple occasions or multiple business partners and whether changes are needed to your processes to prevent these.

Finally, remember human rights due diligence is an on-going process. Responding to risks and impacts is rarely a quick fix and can require continuous and evolving actions over time. Focus on achievable actions and make sure you track your response (see section 2.3 Track actions) to continuously adapt your response.



Tool 2.2.C – Identify opportunities for leverage (team activity)

This activity will help you assess your level of leverage over specific business partners who are related to risks or impacts. Identifying levers are key to define your engagement approach and appropriate actions to respond to the risk or impact. You should involve colleagues who know these partners well and have good insights into your business relationship with them.

Follow the link to [access Tool 2.2.C – Identify opportunities for leverage \(team activity\)](#).

2.3. TRACK ACTIONS

According to the UNGPs, all companies are expected to regularly monitor their performance in preventing and mitigating adverse human rights impacts. This is to ensure that companies understand if their actions are achieving the desired result and adapt processes and procedures if they do not.

A company's response to risks and impacts may be measured by looking at:

- **Inputs and outputs** – The financial, human and material resources used for an action, what is being produced and how it is being used. This also includes processes your company has in place to carry out HRDD (e.g. description of any existing supplier audit programme in terms of the extent and frequency).
- **Incidents** – The results of monitoring instances of negative impacts (e.g. safety violations).
- **Outcomes** – The action's effects at the target-group level.
- **Impacts** – The action's effects at a broader, societal level.

Measuring performance is often associated with quantitative KPIs (inputs and outputs) and you may already have performance measurement processes that you can integrate these additional elements into. However, qualitative elements (outcomes and impacts) are equally important as they can tell much more about how effective an intervention is. For example, when measuring performance of a staff training, consider whether the training has led to any changes (e.g. increased awareness/understanding, behaviour change). While it may not always be straightforward, it is important to measure the qualitative aspects of your interventions.

To measure performance, you will need:

- **KPIs** to track and report on the implementation and effectiveness of your actions; and
- **Tracking methods** that are:
 - i. **Internal facing**, such as employee surveys/feedback box, internal audits, grievance mechanisms or whistle-blower hotlines; and
 - ii. **External facing** for suppliers and other business partners, such as self-assessments, worker engagement tools (e.g. worker voice hotlines, grievance mechanisms), audits, on-site visits.

This section aims to guide you in setting up the indicators and data collection tools that will support your tracking activities.

List of tools

Tool 2.3.A is a checklist to help you assess your current tracking activities.

Tool 2.3.B is a brainstorm activity to guide the development of good indicators.

Tool 2.3.C is a template tracker to effectively monitor your actions.



Tool 2.3.A – Assess your tracking activities (checklist)

Do you track what is being done to manage or remedy actual impacts?

You should focus on your response to actual risks and impacts, rather than simply tracking processes or procedures.

Tool 2.3.C – Action tracker (template) provides a simple form to track your actions.

Have you assigned KPIs against your actions?

- Have you assigned qualitative indicators that will help evaluate the effectiveness of your action?

Have you assessed if your monitoring/tracking methods are reliable?

- If not, try to identify ways to update and improve your methods.

Are you monitoring/tracking efforts focused on areas of highest risk?



Tool 2.3.B – Formulate good indicators (team activity)

Use this activity to develop good indicators against your proposed actions (see Tool 2.2.B). You should involve staff members responsible for the HRDD process or any other relevant colleagues. Some steps may require more time, so you can choose to do two workshops to brainstorm steps 1 & 2 and steps 3 & 4.

Follow the link to [access Tool 2.3.B – Formulate good indicators \(team activity\).](#)

Tool 2.3.C – Action tracker (template)

Building on your risk register (Tool 2.1.D), action plan (Tool 2.2.B) and indicators (Tool 2.3. B) use this template to build your action tracker. This will later help you monitor progress and effectiveness of your response to identified risks and impacts.

Follow the link to [access Tool 2.3.C – Action tracker \(template\).](#)

2.4. COMMUNICATE

Communicating your company's actions to stakeholders is the last, but not least important, aspect of your HRDD process. Stakeholders' preferences and ability to access information may differ, for example if they lack Internet access or are not used to formal company documents in English. It is therefore important to consider different ways of conveying information and identify the most appropriate channels and language to reach the relevant stakeholder groups.

Check [RJC COP Guidance](#) on provision 6.1D for some useful tips on what to consider when developing your communication strategy.

This section aims to help you identify how to communicate, meaning the different and most appropriate means of communications based on relevant stakeholder groups. This section complements Step 4 – Communicate (COP 6.1d) which focuses on what information should be reported on and communicated.

List of tools

Tool 2.4.A is a checklist to guide you when building your communication strategy.

Tool 2.4.B provides examples of how different stakeholders may be reached and what should be communicated to whom.



Tool 2.4.A – Build your communication strategy (checklist)

Do you communicate your activities and results at least once a year?

Is there clear ownership of the communication process within your business?

Ideally this will be the person responsible for internal and/or external comms.

Are the people responsible for HRDD involved in the development and/or review of the communications messages?

This is important to ensure that nothing is ‘lost in translation’ and that what is communicated is an accurate reflection of the actions taken and their outcomes.

Do you use multiple channels of communication to reach your stakeholders?

For example, depending on your stakeholder groups and size of business, you could publish a human rights report or integrate your disclosure in your existing management reports; share your actions during an internal or external events; leverage local partnerships to deliver communications to target groups, such as individuals and communities impacted.

Do you communicate your activities to your internal stakeholders at least annually?

- Are the chosen communication channels/platforms suited to their circumstances? (e.g. if email traffic is high, you may want to communicate activities through a company event or intranet).

Do you communicate your activities to your external stakeholders?

- Are your chosen communication channels or platforms suited to their needs? (e.g. consider translating the communication in the language of the stakeholder group, such as top suppliers, who may be less comfortable with English. This way they may be able to share it more widely within their organisation/community).

Do you have a clear understanding of who your stakeholder groups are?

- Have you considered their specific characteristics, which will influence their preferences and abilities to access information? (e.g. language, literacy, potential barriers to communication such cultural or technological).

Have you adapted your communication style, language and format to the characteristics of relevant stakeholder groups?

For example, when communicating to your customers or on social media, you may want to avoid jargon or technical terms.

Do you seek ways to improve your communication, accessibility and reach?



Tool 2.4.B – Suggested channels for engaging with different stakeholder groups (helpful resource)

Consider this resource to think about how to best reach different stakeholder groups by using different communication channels and working with groups who may be able to support you in communicating with the target group.

Stakeholder groups	Potential channels	Potential stakeholder who can support development/delivery
Employees	<ul style="list-style-type: none"> Internal meeting Internal event Intranet Newsletter Employee committee 	Employee committee, Human Resources, Communications, worker committee, worker representatives...
Supply chain workers	<ul style="list-style-type: none"> Worker committee/meeting Worker representative(s) On-site communication materials (e.g. brochure, posters) Employee Forums 	Local NGOs, Trade unions, ...
Customers	<ul style="list-style-type: none"> Company website Newsletter Social media Human rights report Exhibitions and conferences Customer meetings 	Marketing, Communications, Customer insights, IT functions, ...
Local communities	<ul style="list-style-type: none"> Community representative Brochure Creative means 	Local NGOs, ...
Investors	<ul style="list-style-type: none"> Management reports Inclusion in financial reporting 	Finance, Legal, Communications, HR, ...

Step 3 – Provide for or support remedy (COP 6.1c)

Grievance mechanisms are an important part of a businesses' responsibilities under the UNGPs. An effective grievance mechanism provides companies with a process for systematically receiving, investigating and responding to rightsholder complaints and remediating them.

A grievance mechanism is a channel through which people are able to communicate the fact that they feel negatively affected by your business and can seek remedy. Potential users of grievance mechanisms may be any individuals or groups whose rights could be negatively impacted by the company. For example, employees, contract workers, workers in the supply chain, artisanal miners and their families, members of the community around a business facility or site, consumers or end-users. If grievances are raised, it is important that these are investigated in an impartial manner, that findings are actioned and that feedback is provided where possible.

Grievance mechanisms should be seen as part of a broader stakeholder engagement approach, offering multiple opportunities for rightsholders to raise concerns and/or provide feedback.

They should also reflect the business' capacities and processes. Grievances mechanisms of SMEs will likely be less complex and in some cases more informal than in large companies. SMEs should also consider adapting existing mechanisms before establishing new ones, and consider third-party solutions to pool resources, for example by teaming up with trade associations or industry initiatives to operate grievance processes.

This section aims to assist you in developing effective and suitable grievance mechanisms, and ensure they are embedded within your human rights due diligence process.

Check [RJC COP Guidance](#) for 6.1C and 14.3E for additional support on how to provide for or support remedy.

Examples of channels for communicating a grievance

- Hotline (for employees or customers/whistle-blower hotline, general inquiries)
- Email address
- Complaints box
- Speak-up policy
- General staff surveys
- General meetings, where participants have the explicit opportunity to raise concerns
- Meetings related to work processes (e.g. shift handovers)
- Designated contact person
- Trade union
- Staff council
- Ombudsman
- Grievances system via public authorities or sector /multi-stakeholder initiatives (e.g. OECD NCPs)
- Audit processes (and interviews with staff)
- Hotlines/mechanisms in the supply chain › Stakeholder engagement processes

Key terms

Complainant: An individual, or group, that has submitted a grievance. Complainants may include individuals who allege harms against themselves, or who allege harms against others as a result of business activities.

Remediation: The process of providing remedy for a negative human rights impact. This may take range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, guarantees of non-repetition.

List of tools

Tool 3.A is a general checklist to help you embed grievance mechanisms.

Tool 3.B is a grievance mechanism process flow template to use when developing or review your grievance mechanism(s).

Tool 3.C is a checklist to help you assess grievance mechanism based on UNGP criteria.

Tool 3.D is a team activity to help you map potential grievance mechanism users relevant to your business.



Tool 3.A – Embedding grievance mechanisms (checklist)

Company commitment

Does your company have a commitment to developing and implementing effective grievance mechanisms in relation to your own operations and at supplier levels?

Does your company have a commitment to protect complainants' personal data?

Does your company have a commitment to protect complainants against retaliation?

Basic procedures

Is there a procedure to protect complainants' personal data and to protect them against retaliation?

Is there a clear process in place for managing grievances?

- Have roles and responsibilities been clearly defined?
- Has an indicative timeframe been assigned to each stage?
- Has a procedure been defined to assess, prioritise, investigate, resolve or appeal, follow-up and close a grievance?

Use Tool 3.B – Grievance mechanism process (template) to develop your process end to end.

Are grievances assigned to a person with relevant knowledge and expertise for handling them?

Ideally this person will also demonstrate awareness of gender issues and influence of unconscious bias in investigations. In cases that are more complex, you may also want to appoint an independent third-party with relevant expertise to investigate and handle complaints.

Does your grievance mechanism meet the effectiveness criteria set out in the UNGPs?

Use Tool 3.C – UNGP criteria for effective grievance mechanisms (checklist) to help you assess your grievance mechanism in line with the UNGPs.

Have your grievance mechanisms been designed and/or adapted based on the characteristics of potential users?

Key characteristics to consider are: if they are vulnerable or face any barriers to raise grievances, their location, the types of grievances they may actually or potentially raise, and the ways in which they can currently report grievances.

If you have not or only partially adapted your grievance mechanisms to potential users, use Tool 3.D – Mapping grievance mechanism users (team activity) to map the characteristics of potential users.

Do you require your suppliers and business partners to develop their own grievance mechanisms?

For example, in your contracts terms & conditions, supplier code of conduct or other relevant policy documentation. Where feasible and appropriate, you may work with peers and suppliers to establish a joint grievance mechanism.



Tool 3.B – Grievance mechanism process (template)

This tool offers a template to develop an end-to-end grievance handling process.

Use this template as a basis for discussing and formalising your process into a document, for establishing who will be responsible for each stage, and the KPIs for measuring success at each stage. You may want to integrate this process with existing mechanisms you have, for example, for managing complaints or grievances from employees. This can provide efficiencies but you should ensure that it is suitable for all types of users.

1. **Receive:** The responsible person(s) in the company receives and documents a complaint.
2. **Assess:** The responsible person(s) establishes the severity of the complaint. The relevant process for this type of complaint is followed.
3. **Acknowledge:** The responsible person(s) in the company confirms receipt of a complaint and outlines processing timeline. If a complaint is not accepted, it is explicitly reported back to the complainant where possible.
4. **Investigate:** The responsible person(s) determines who needs to be consulted. Through stakeholder engagement, the facts leading to the complaint are clarified, the responsible party is identified, and what remedy is desirable is decided.
5. **Respond:** Through stakeholder engagement, a remediation proposal is prepared. The proposal should be specific and time-bound. Remediation should be responsive to the needs of the complainant. If the complaint is found to be unsubstantiated, it will be explicitly reported back to the complainant and may indicate other avenues of remedy.
6. **Resolve:** The remediation plan is agreed upon by all parties and is implemented to provide resolution.
OR Appeal: The remediation plan is appealed by the complainant who will provide explanation to an independent moderator.
7. **Follow up & Close:** The implementation of the resolution is monitored and followed upon if issues arise. All parties are asked for feedback on the level of satisfaction with the grievance handling process and the outcome, before the grievance is closed.

Note:

- Each stage should have an indicative timeframe assigned against it.
- An individual should be accountable for the operation of this process, ensuring that each stage is executed in a timely, impartial and diligent manner.



Tool 3.C – UNGP criteria for effective grievance mechanisms (checklist)

Criteria & Definition Key requirements to meet the UNGP criteria

Legitimate: The grievance mechanisms trust from the users for whom it is intended and is accountable for the fair conduct of grievance processes.

- Has a clear end-to-end process been set up that describes the approach to handling grievances?
- Have clear responsibilities been established and have the individuals responsible for handling incoming grievances been appropriately trained?
- Is there a clear statement that the people who submit a grievance will not be disadvantaged or punished as a result and is compliance being monitored?
- Is there a mechanism to protect personal data during the grievance process?
- Have potential users been involved in informing the design of the grievance mechanism?

Accessible: The grievance mechanism is known and accessible to all potential users and offers adequate support to those who may face barriers to access.

- Are potential users aware of the grievance mechanism and are they able to use it?
- Are there multiple channels for filing a grievance?
- Have specific characteristics of potential users been considered when implementing the grievance mechanism? (e.g. language, culture, gender, caste, ethnicity, age, vulnerability, disability, level of literacy, etc.)
- Have you taken additional steps to ensure vulnerable groups can access the grievance mechanism?

Predictable: The grievance mechanism ensures a clear and known process with an indicative timeframe for each stage and clear information on available types of procedures and outcomes.

- Has the grievance process, its timelines and potential approaches to finding a solution been communicated to potential users?

Equitable: Users have reasonable access to information, advice and expertise. They can participate in a grievance process in a fair, informed and respectful way.

- Are you providing access to assistance and representation (trade union, person of same gender, anyone the complainant may choose) to complainants?
- Is necessary support provided to ensure potential users can access the grievance mechanism? (e.g. by engaging with relevant stakeholders such as trade unions or civil society organisations to promote awareness)

Transparent: The grievance mechanism keeps the parties to a grievance informed about progress and provides sufficient information about performance of the grievance mechanism.

- Are users kept informed of the progress of the procedure?
- Is effectiveness of the mechanism being reviewed and communicated internally and externally?
- Is complainants' confidentiality respected when communicating about procedures and outcomes?

Rights-compatible: The grievance mechanism ensures that the outcomes and remedies comply with internationally recognised human rights.

- Are particularly serious grievances escalated and prioritised?
- Are solutions and corrective measures developed in line with the needs of the people affected?

Based on dialogue: Individuals or groups for whom the grievance mechanism is intended are involved in the development and performance of the grievance mechanism. Dialogue is used as the means to address and resolve grievances.

- Are potential users involved in the development and performance and measurement of the mechanism?
- Are grievance processed using dialogue-based approaches to identify remedy and resolve grievances?

Based on continuous learning: Relevant measures are in place to identify lessons for improving the mechanism and preventing future grievances and harms.

- Is feedback from complainants consistently solicited, reviewed and used to improve the grievance mechanism?
 - Are the experiences from operating the mechanism being used to improve its functioning, refine KPIs, and to adapt other relevant management processes?
-



Tool 3.D – Mapping potential grievance mechanism users (team activity)

Use this activity to map who may potentially use grievance mechanisms. Consider people who are located on your business premises as well as those who are not.

This activity will help you dive deeper into the characteristics of potential users (location, potential barriers, types of grievances that could be raised, etc.) and enable you to develop new or adapt existing grievance mechanisms in line with the potential users' circumstances and needs.

You should involve staff members responsible for the due diligence process or any other relevant colleagues.

[Follow this link to access Tool 3.D – Mapping potential grievance mechanism users \(team activity\).](#)

Step 4 – Communicate (COP 6.1d)

Reporting on efforts to prevent and address human rights impacts should at least be completed once a year, and shared internally and externally in a way that is accessible to the intended audiences (as seen in section 2.4 Communicate).

It should also aim to reach affected stakeholders who have raised grievances or concerns, providing enough information for them to evaluate your company's response. This communication is distinct from engagement with potentially affected stakeholders/rightsholders for the purposes of assessing or addressing specific impacts.

Building on section 2.4, this section aims to guide your annual reporting, focusing on what information should be reported on and shared with internal and external stakeholders.

Check [RJC COP Guidance](#) page 33, pages 46-47, and pages 85-87 for additional support.

Note: Although reporting is an annual requirement, if you are going to undergo your first RJC audit before a year of conducting OECD-based due diligence, you must produce a report of your activities to date for the auditor to review.

List of tools

Tool 4.1 is an annual reporting template to help you identify and structure what information should be reported.



Tool 4.1 – Annual reporting (template)

You can complete your human rights disclosure as part of COP 3 Reporting, and it should be made publicly available. If you have a website, you should upload it there. If you do not have a website, ensure that you communicate to stakeholders that your report is available by other means, such as having printed copies available at your premises or upon request via email.

Follow the link to [access and complete Tool 4.1 – Annual reporting \(template\)](#).



PART 3 – CREATE YOUR COP 6 IMPROVEMENT PLAN

Now that you have assessed or completed your HRDD cycle, you are ready to define the next steps to continuously improve your HRDD in line with COP 6.

Using the Part 3 – COP 6 Improvement Plan (template), assess your existing activities and systems. Next steps and recommendations have been included in case some aspects of your HRDD are not fully complete or need improvements.

Follow the link to [access and complete COP 6 Improvement Plan Template.](#)

TOOL LIBRARY

Tool 1.1.B – Human rights policy (template)

Below is a framework for your human rights policy commitments. Templates have been included for each section. You must ensure you have adapted this to suit your circumstances.

Tip

Use practical, clear and concise language in your policy so the context and issues are easy to understand for colleagues and business partners.

[Company name]'s human rights policy

Section 1 – Establish your position towards the issue.

We, at **[Company name]**, recognise our responsibility to respect human rights. We believe that our business has a role to play in protecting and promoting human rights.

Section 2 – Set out the principles upon which your policy is based.

[Company name] is committed to respect internationally recognised human rights throughout our operations and supply chains. In line with the UN Guiding Principles on Business and Human Rights, our Policy is based upon the international standards enshrined in the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Section 3 – Explain what human rights mean to your organisation.

Human rights refer to a set of basic rights and freedoms that belong to every person in the world, regardless of where they are from, what they believe or how they choose to live their life. It is a broad concept, with economic, social, cultural, political and civil dimensions. For **[Company name]**, respecting human rights means ensuring that any person involved in, or coming into contact with, our operations, supply chains and products is treated with dignity, respect, fairness and equality.

Section 4 – Define the scope of your policy, and who it applies to.

Our Policy sets out overarching principles for how we conduct business at **[Company name]**. Together with our employees and business partners, we are committed to drive forward the implementation of this Policy throughout our operations and supply chains. We recognise unique challenges to these standards may arise and we will work to address these challenges in partnership with relevant partners and stakeholders.

*Section 5 – Set out key human rights related provisions on employment. You can use the **ETI Base Code** as reference as well as the **RJC COPs** related to labour rights, working conditions and health & safety.*

1. Employment is freely chosen
2. Freedom of association
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

More detailed provisions may be needed where a particular right is known to be at special risk in a country where you operate or source from. For example:

Child labour is not used. There is no recruitment of child labour. The Employer shall develop or participate in policies and programmes which provide for the transition of any child involved in child labour into quality education until no longer a child. No one under eighteen years old is

employed at night or in hazardous work or conditions. In this Code, “child” means anyone under fifteen years of age, unless national or local law stipulates a higher mandatory school leaving or minimum working age, in which case the higher age shall apply; “child labour” means any work by a child or young person, unless it is considered acceptable under the [ILO Minimum Age Convention 1973 \(C138\)](#). [ILO Minimum Age Convention 1973 \(C138\)](#).

Section 6 – Explain how this policy will be implemented and kept up to date.

[Company name] will continuously work to embed this Policy throughout the relevant processes and procedures of the company to ensure its effective implementation.

We recognise that we must take steps to identify and address any actual or potential adverse impacts, whether they are directly or indirectly linked to our business activities or relationships. We understand that human rights due diligence is a dynamic, on-going process which requires acting on the findings, tracking our actions, and communicating to our stakeholders how we address impacts.

As our human rights risks and impacts may vary over time, this policy will be subject to review if proven inadequate by our human rights due diligence process.

Signed:

Date of effect:

Tool 1.1.C – Stakeholder mapping (activity and template)

Following the definitions below, allocate the stakeholders to one of the four categories. You can map the stakeholders using the figure provided in this template, or by creating a simple table.

Responsible

– the person/people who will be responsible for the work/policy/action.

Accountable

– the person/people who will be accountable for the work/policy/action

Onboard

– the person/people who need to be engaged in supporting the work/policy/action

Informed

– the person/people who need to be kept up-to-date about the work/policy/action



Tool 2.1.B.2 – Know your supply chain (team activity)

This activity helps you map your supply chain and identify any knowledge gaps. You should involve sourcing and product team members and/or staff members responsible for the due diligence process. For smaller companies this may be the same person and it may feel difficult to reach out to larger business partners, but many of these entities will already be gathering such information for their own HRDD and they should be prepared to share information.

1. Pick a product from one of your most popular product categories.
2. List out key processes involved as part of the production stage, i.e. any processes that are integral to the production of the end product.
3. Map all your suppliers, including any declared subcontractors, which you know are carrying each process. Include an estimated percentage of orders are placed with each of them. You may not have this information to hand, so highlight where the gaps are, to come back to it at a later point.
4. Now list the location of all the suppliers, trying to include as much detail as possible (country, region, city, district, etc). Where you do not have all the information at hand, make sure to document the gaps.
5. Use Tool 2.1.B.2 – Know your supply chain (template) to summarise your findings
6. Now, together with your colleagues, use the following questions to facilitate your brainstorming. You may want to share the table and questions with your colleagues prior to the session as a pre-read.
 - What kind of work is performed for each process?
 - Is production level across the year or are there major peaks and troughs that affect production?
 - What do you know about the types of workers performing the work (e.g. are they local permanent employees, contractors, migrant workers etc)?
 - Where do you think you have the most influence or leverage?
 - Are there any gaps in your knowledge of the above?
 - What could you do to fill these gaps?

If you are lacking visibility of some of your Tier 1 suppliers, use the Information request guide on page 21 to collect information about your Tier 1 suppliers.

Tool 2.1.B.2 – Know your supply chain (template)

Production stage	Processes involved	Supplier	Processes carried out by supplier	Proportion of orders (estimated in %)	Country and location
Tier 1: Main production site	Assembly, casting, ...	Supplier A			
		Supplier B			

Tool 2.2.C – Identify opportunities for leverage (team activity)

Questions to brainstorm	Conclusions
Do we have direct influence over the entity?	
What percentage of the entity's business does our company represent?	
What do the terms of the contract with the entity include? Does any term specify conditions in regard to our human rights policy commitment?	
Could we incentivise the entity to improve human rights performance in terms of future business? Reputational advantage? Assistance with building their capabilities?	
Does working with this entity benefit their reputation? Would ending the relationship negatively impact their reputation?	
Could we incentivise other enterprises or organisations working with this entity, including business associations and multi-stakeholder initiatives, to improve their human rights performance?	
Could we engage local or central government in requiring improved human rights performance by the entity through the implementation of regulations, monitoring, sanctions or anything else?	

Tool 2.3.B – Formulate good indicators (team activity)

1. Think about the objectives of each action

For each action, think about what you are trying to achieve: what does success look like? Write your ideas down and discuss as a group: What are the key dimensions of your objectives? (e.g. quantitative, qualitative, descriptive). How will you recognise that the objectives have been achieved?

2. Organise and refine ideas

Group ideas together against actions, make additions and remove any duplicates if needed. Discuss as a group: Are the key dimensions of your objectives covered by an indicator? Highlight 3 to 4 indicators maximum for each action.

3. Formulate indicators

Use the SMART framework (Specific, Measurable, Action-Oriented, Realistic, Time-bound) to formulate your indicators. Consider the unit that should be measured (e.g. quantities, averages, a percentage, a percentage change, a total, etc.) and draft your indicators. Discuss as a group: is it clear what is to be achieved, by whom, and within what timeframe? Do the indicators enable you to assess implementation and how effective the actions have been?

Example: The action is to roll out a training to top suppliers about your human rights policy. The objectives are to ensure all top suppliers are trained, understand what the policy is for and their responsibility, including how and when to report a potential breach.

Potential mix of indicators:

- *Percentage of top suppliers trained on your human rights policy by the end of the financial year (quantitative)*
- *Percentage of top suppliers declaring they understand what the human rights policy is for and what their responsibility is (quantitative, assessing the quality of the intervention)*
- *Percentage change in the number of breaches identified (qualitative) Note: an increase may likely be a positive indication of behavioural change, with more breaches being reported rather than hidden*
- *Number of suppliers who are more engaged, demonstrated through signs of greater openness and exchange (e.g. by raising questions, discussing potential breaches, or expressive needs for capacity building) (descriptive)*

4. Select indicators & tracking methods

Discuss as a group: Does an appropriate and accessible source of data exist or will you need to develop your own tool? What could this tool look like (e.g. self-assessment questionnaire, survey, etc.)

Once you have considered how you will collect the data, discuss and agree on the “SMART” indicators that will give you key information about the output and the outcomes of your interventions.

Tool 3.D – Mapping potential grievance mechanism users (team activity)

1. Discuss which groups of people may be affected/impacted by the activities of your company and write them down on a flipchart. Don't forget to consider vulnerable groups or groups that may not be directly involved in operations such as the surrounding community.
2. Based on the risks and their relationship to your business you have identified in Step 2, discuss which groups should be prioritised. The greater the human rights risk for certain people and the closer the relationship of your company to them, the greater the responsibility to establish a human rights grievance channel. Highlight these on the flipchart.

Note: The UNGPs recognise that businesses have limited resources at their disposal, so it is acceptable to prioritise groups based on risk when establishing grievance mechanisms.

3. Next, on a new sheet, create two mind maps (see templates in the next pages) to visualise how each group is connected to your business operations, supply chain and activities.

People located on the business premises will for example include your own staff and employees of service providers, etc. People not located on the business premises will for example include supply chain workers, end consumers, communities who may be affected by the business/supply chain activities, etc.

Add the groups on your mind map (in the grey circles) and write down where they are typically located (country or region). Add more circles if necessary. Consider vulnerable groups and add them to your mind map (in the orange circles). This will later help you select the appropriate types of grievance mechanism for the various groups, taking into account their cultural context and potential barriers to access.

4. Now, consider what types of grievances the various groups of people could potentially raise with your business. Don't limit your mapping based on the fact that your business may never have been confronted with a grievance from one of the groups, as there may be various reasons for this. The aim of this part of the exercise is to capture grievances that have actually been received and to identify potential grievances. You can summarise your findings in the table in the next page.

Grievance topics	Groups that might raise a grievance	Level
HR issues (e.g. pay, discrimination, working hours, harassment, etc.)	Company employees	Own premises
	Employees of suppliers and business partners	Supplier and business partners premises
Product impacts	Company employees	Consumers
		General public

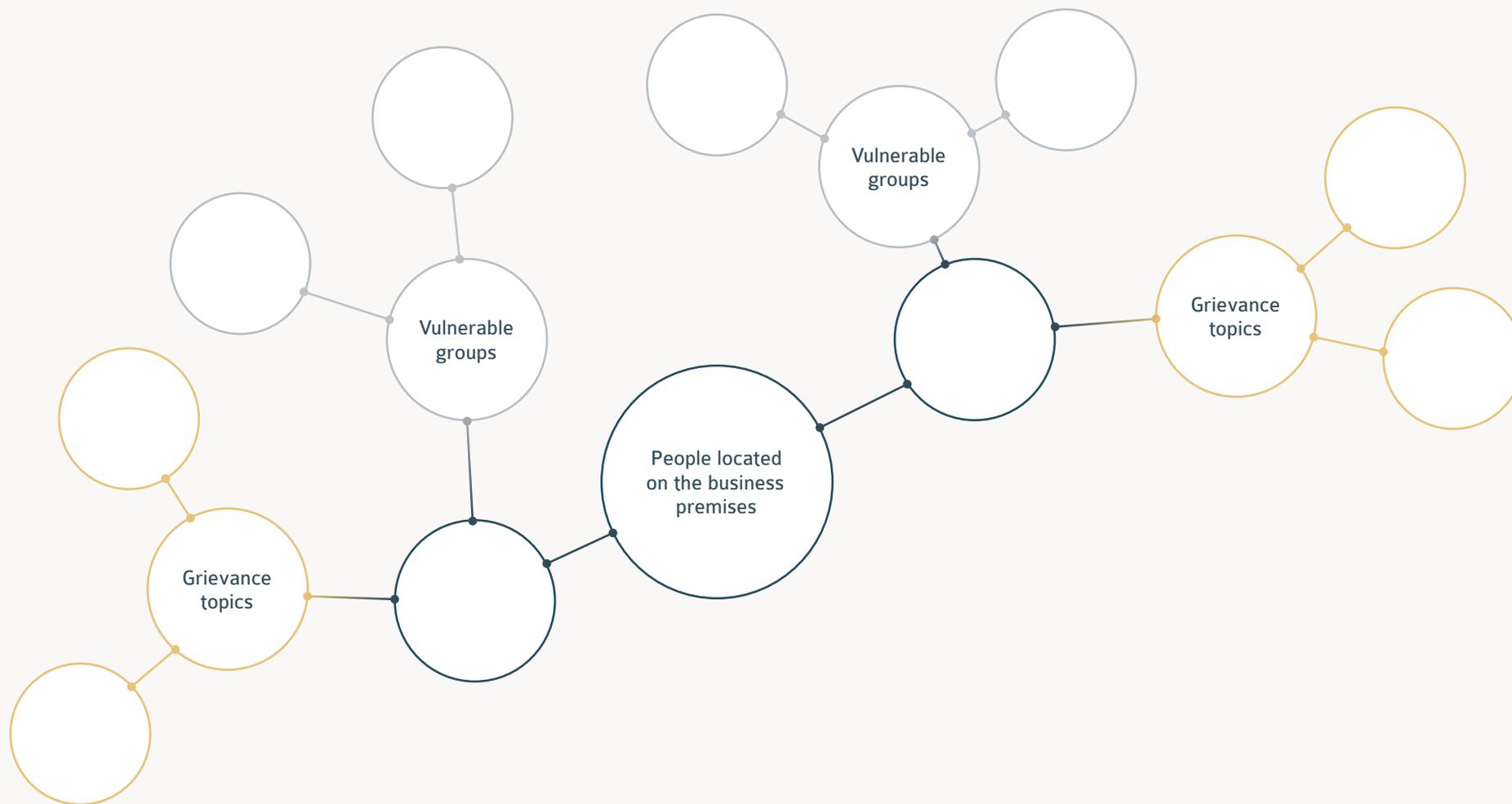
5. Workshop ways in which the groups identified can currently contact your business about their concerns, and add these to the mind map (in the green circles). Add more circles if necessary.

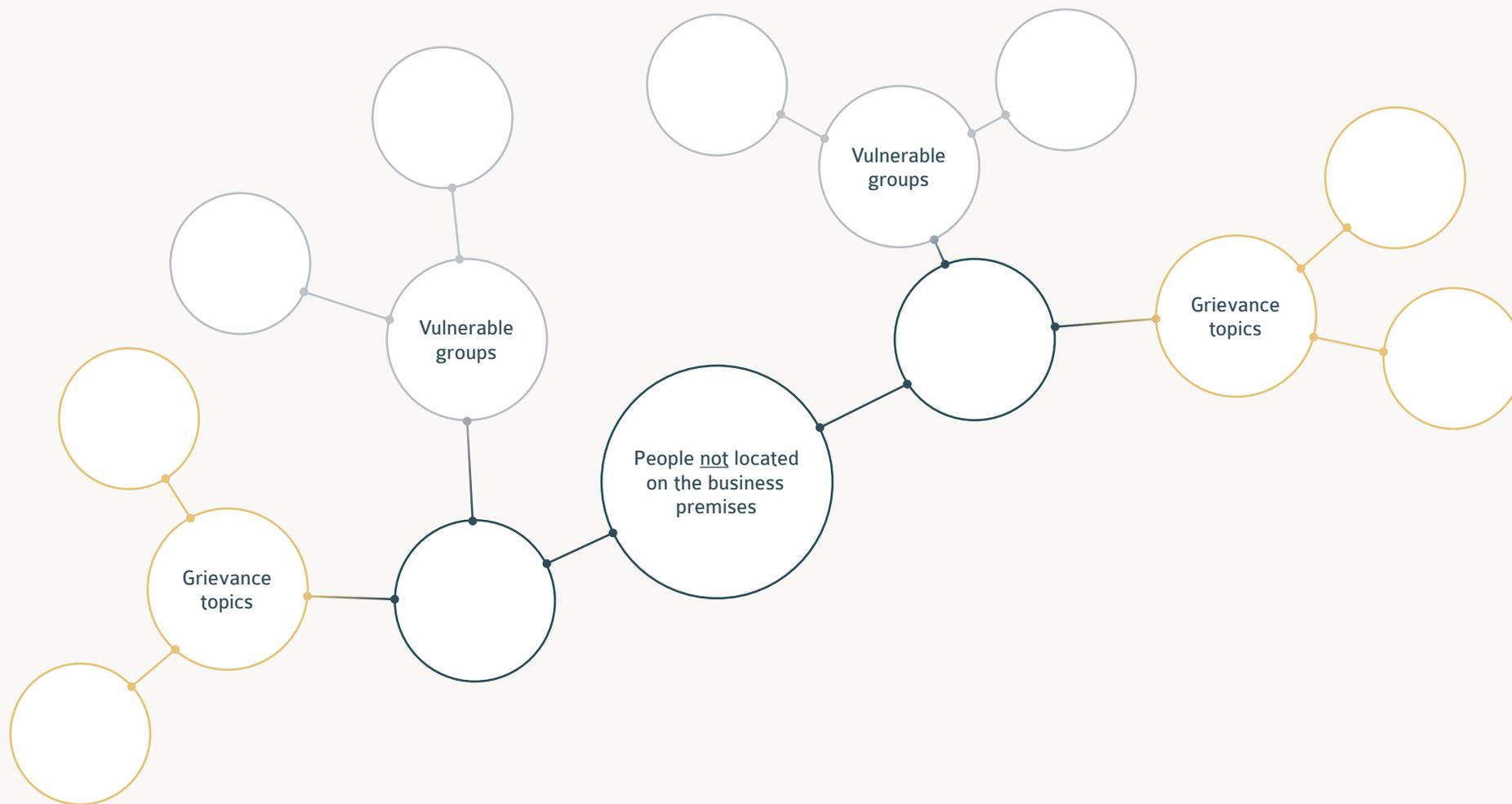
Finally, take a look at your final mind map and reflect on your findings. Consider the following questions and discuss:

- Are there any obvious gaps or room for improvement?
- Do all groups have a channel through which they can raise grievances?
- Do the channels adequately cover the potentially relevant grievance themes?
- Are the approaches adapted to the relevant groups' geographical location and their typical means of communication?

Vulnerable groups could include:

- Migrant workers and their families
- Temporary workers /contractors
- Women
- Children and young people
- People with disabilities
- People with different sexual orientations
- Ethnic or religious minorities
- Indigenous groups
- Unskilled people
- People with no or limited literacy





Tool 4.1 – Annual reporting (template)

Company name:

Date:

Reporting period:

COP 6 requirements What to report

Step 1 – Have a policy commitment (COP 6.1a)

Commit	Includes details about your human rights policies and commitment, and how it is communicated to suppliers and other stakeholders.
Embed	Describe how responsibilities are allocated across your business functions or specific staff positions, as well as responsibilities of board of directors. Share whether you have internal teams or working groups. Provide information on the number of resources e.g. in terms of Full Time Employees (FTEs).

Step 2 – Have a human rights due diligence process (COP 6.1b)

Assess	Describe the process for identifying and assessing your company's human rights risks and impacts. Disclose any risks or impacts you have identified, especially those you consider to be salient human rights issues. At a minimum, disclose the findings of your assessments.
Integrate and respond	Describe how you take action to prevent, mitigate or remediate (at least) your salient human rights issues. You can also provide examples of specific actions taken, or to be taken, on one or more of your salient human rights issues as well as targets.
Track actions	Describe how you track the actions taken to address human rights risks and impacts, including qualitative indicators, and how you evaluate whether the actions taken have been effective or have not produced the expected results. This may take the form of case studies. You can also provide examples of lessons learned while tracking the effectiveness of your actions on selected (salient) human rights issues. To go further, you can provide information on challenges, issues and limitations in addressing your impacts, including aggregated information on grievances raised and remedy provided.
Communicate	Describe how you are communicating your efforts, the different communication channels you are using (e.g. reports, website, media articles, blogs, etc.) to reach your stakeholders and rightsholders and how they are adapted to their needs and circumstances. You can add links to or illustrations of these communications, if possible.

Step 3 – Provide or support remedy (COP 6.1c)

Provide or support remedy	Disclose information about how your own workers, suppliers' workers and external stakeholders can raise grievances related to your company's activities and the number and types of grievance received, investigated and the outcome. This can be at aggregated level. These can be your own grievance mechanism(s) or those you participate in, for example those of clients or industry platforms or such related to specific human rights issues.
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Part 3 – COP 6 Improvement Plan (template)

Complete this template and establish your next steps based on the recommendations in the last column. If there are too many next steps, prioritise them and earmark those that will need consideration at a later point (e.g. 6, 12 or 18 months). Ensure that someone is assigned to each of your next steps and that a timeframe is decided, with regular touch points to track progress and discuss any challenges.

HRDD area		Actions	Recommendations
STEP 1	Commit	The company has a written commitment to respect human rights and refers to relevant international human rights standards and frameworks.	Refer to Tool 1.1.B – Human rights policy (template) to write your commitment and Tool 1.1.C. – Stakeholder mapping (activity and template) to engage relevant stakeholders in the process.
		The policy is signed at the most senior level within the company and publicly available.	Identify the most appropriate senior leader within your company to engage on this agenda and sign the policy. If you don't have a website to publish your policy, make sure you have the document always at hand in case of external requests.
		The policy is communicated to internal and external stakeholders.	Refer to Tool 1.1.C. – Stakeholder mapping (activity and template) to map who your policy should be communicated to and how.
		Stakeholder engagement is taking place to ensure relevant groups (e.g. employees working with suppliers, suppliers, etc.) understand the policy and expectations.	Refer to the set of questions provided in Tool 1.1.C. – Stakeholder mapping (activity and template) to consider how to best communicate your policy and its expectations.
	Embed	Responsibility for human rights is clearly defined and resources to support the due diligence process has been adequately assigned.	Refer to Tool 1.2.A – Establish your HRDD management system (checklist) to identify staff best placed to take on responsibility for human rights and the due diligence process.
		Some form of training is provided to relevant staff.	Consider developing your own training on the basics of human rights or engage an external third-party with relevant expertise. If you don't have the resource or capacity, consider signing up to free courses, which the Business & Human Rights Resource Centre keeps a public running list of .
		Internal processes and procedures have been reviewed to embed human rights due diligence.	Assign responsibility for reviewing internal processes and procedures and timeline.
		Accountability is clearly defined and there is a communication process to report human rights risks to the person(s) responsible for human rights.	Consider setting up regular meetings with people responsible for human rights and the due diligence process to discuss accountability and establish a process to report findings of your due diligence process to the appointed senior staff member, and regularly check in on your action plan.

STEP 2	Assess	The company has identified and prioritised its most salient human rights issues in its own operations.	Refer to 2.1 Assess to research your salient human rights issues in your operations and prioritise them. Use Tool 2.1.C – Identifying and assessing salient human rights issues (helpful resource) and Tool 2.1.D – Risk register (template) to support your research and prioritisation.
		The company has mapped the first tiers of its supply chain and identified the most significant business relationships.	Refer to Tool 2.1.B.2 – Know your supply chain (team activity & information request guide) to help you increase visibility of your supply chain. Engage with relevant staff to find out who your largest business partners and suppliers are, in terms of value and/or volume.
		The company has identified and prioritised the most salient human rights issues in relation to its most significant relationships.	Refer to section 2.1 Assess to research your salient human rights issues in relation to your most significant business partners and suppliers and prioritise them. Use Tool 2.1.C – Identifying and assessing salient human rights issues (helpful resource) and 2.1.D to support your research and prioritisation.
		The company has identified and prioritised the most salient human rights issues across the first tiers of its supply chain.	Refer to section 2.1 to research your salient human rights issues in your supply chain and prioritise them. Use Tool 2.1.C – Identifying and assessing salient human rights issues (helpful resource) and Tool 2.1.D – Risk register (template) to support your research and prioritisation.
		The company has mapped lower tiers in its supply chain.	Refer to Tool 2.1.B.2 – Know your supply chain (team activity & information request guide) to help you increase visibility of your low tiers. Establish a realistic scope and timeframe to gradually map low tiers.
		The company has identified and prioritised the most salient human rights issues across the lower tiers of its supply chain.	Refer to section 2.1 Assess to research your salient human rights issues in your low supply chain tiers and prioritise them. Use Tool 2.1.C – Identifying and assessing salient human rights issues (helpful resource) and Tool 2.1.D – Risk register (template) to support your research and prioritization.
		Stakeholder engagement is taking place as part of the supply chain mapping and the identification and prioritisation of human rights issues.	Refer to Tool 1.1.C. – Stakeholder mapping (activity and template) to guide your stakeholder engagement approach when mapping your supply chain and assessing your company’s salient human rights issues.

STEP 2 (CONTINUED)	Integrate and respond	<p>The company has processes and procedures in place to enable relevant staff to work together on priority issues.</p>	<p>Consider existing processes where staff responsible for conducting the human rights due diligence process can interact and define actions together on priority issues.</p> <p>If there are not suitable processes in place, formalise your human rights due diligence activities by bringing relevant staff together on a monthly basis at least. Develop a standard meeting agenda and a tracker to monitor actions against priority issues.</p>
		<p>The company has integrated human rights considerations into the pre-selection process of new business partners, suppliers and investment decisions.</p>	<p>Assign responsibility for developing a set of criteria and KPIs to assess new business partners, suppliers and investment decisions.</p> <p>Discuss these criteria and KPIs with relevant staff before seeking sign-off.</p>
		<p>Accountability for addressing priority issues is clearly defined and resources for managing priority issues have been adequately assigned.</p>	<p>Identify the most appropriate senior leader within your company to engage and seek support to get necessary resources.</p>
		<p>Staff responsible for managing priority issues are supported to do their job well (e.g. training, workload balance, etc.).</p>	<p>Develop a business case to present to senior leaders and seek buy-in to allocate more resources.</p> <p>Consider allocating time to upskill relevant staff by having one person responsible for developing and delivering training.</p> <p>If you don't have the resource or capacity, consider signing up to free courses, which the Business & Human Rights Resource Centre keeps a public running list of.</p>
		<p>Adequate actions have been identified to respond to priority issues and opportunities for leverage have been considered.</p>	<p>Refer to Tool 2.1.D – Risk register (template) and Tool 2.2.B – Build your action plan (template) to guide the development of your actions and work collaboratively with relevant staff to agree on actions and timeframes.</p> <p>Use Tool 2.2.C – Identify opportunities for leverage (team activity) to identify opportunities for leverage with business partners and suppliers.</p>
		<p>Stakeholder engagement is taking place to support the development and implementation of adequate actions.</p>	<p>Refer to Tool 1.1.C. – Stakeholder mapping (activity and template) to guide your stakeholder engagement approach when developing and implementing actions.</p>

STEP 2 (CONTINUED)	Track actions	The company uses existing monitoring mechanisms to track progress on human rights related metrics (e.g. Health & Safety) to understand how effectively issues are managed.	
		The implementation of actions in response to priority issues are consistently measured using defined KPIs, which are not solely quantitative.	Refer to Tool 2.3.B – Formulate good indicators (team activity) to help you define adequate KPIs. Use Tool 2.3.C – Action tracker (template) to monitor the implementation of your actions.
		Tracking methods have been reviewed to ensure they are adequate and reliable.	Allocate time as part of the monitoring process to reflect and review the tracking methods and identify opportunities for improvements or solutions.
		The company has integrated learning from monitoring actions and updated internal processes and management systems.	Allocate time to reflect and discuss the implementation of actions and monitoring (e.g. once or twice a year), and consider ways to update internal process and systems.
	Communicate	Ownership of the communication process is defined.	Refer to section 2.4. Communicate and Tool 2.4.A – Build your communication strategy (checklist) and Tool 2.4.B – Channels for engaging with different stakeholder groups (helpful resource) to help you define your communication process and ensure communications can reach your stakeholders.
		Multiple channels of communications are used to reach different stakeholder groups.	
		Communication is accessible to relevant stakeholders.	

STEP 3	Provide for or support remedy	The company is committed to embedding grievance mechanisms in its operations and supply chain.	Consider developing a business case for embedding grievance mechanisms and seek buy-in for senior leaders to commit to it and to allocating sufficient resources to handle grievances effectively.
		The company has confidential grievance mechanisms available to employees and other key stakeholders to raise different concerns, not limited to human rights.	Consider examples of channels of communication set out in Step 3 – Provide for or support remedy (6.1c) and explore those which may be suited for your employees and other stakeholders to raise concerns confidentially. Use Tool 3.B – Grievance mechanism process (template) and Tool 3.C – UNGP criteria for effective grievance mechanisms (checklist) to support you in this process.
		The grievance mechanisms are regularly reviewed to ensure they fit the needs of the potential users, and the salient human rights issues identified.	Refer to Tool 3.D – Mapping potential grievance mechanism users (team activity) to map your existing grievance mechanisms against the characteristics of potential users, but also map all other potential users for whom existing mechanisms may not be suited for.
		The company supports and incentivises suppliers and other business partners in establishing their own grievance mechanisms.	Refer to Tool Tool 1.1.C. – Stakeholder mapping (activity and template) to engage your business partners and suppliers on this agenda and consider ways you can support them.
		The grievance mechanisms are regularly reviewed and updated against the UNGP effectiveness criteria and against user feedback.	Refer to Tool 3.C – UNGP criteria for effective grievance mechanisms (checklist) to assess your existing grievance mechanisms and identify opportunities for improvements.
STEP 4	Communicate (Reporting)	The company has a communication plan to share its efforts in managing and addressing human rights issues.	Refer to section 2.4 Communicate to help you develop a communication plan.
		The company’s activities in relation to human rights issues are communicated at least once a year internally and externally.	Refer to Step 4 – Communicate (COP 6.1d) to identify what information to report and help you structure your reporting.
		The company publicly shares its activities in the form of a report.	



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