

Fair Wear Grievance Handling Procedure



24 July 2025

This procedure sets out what is expected of member brands when grievances are received through the Fair Wear grievance mechanism, both in active countries and in non-active countries. The procedure describes the process underpinning the Fair Wear Grievance Mechanism. This procedure is part of the Access to Remedy Policy Suite and should be read in conjunction with the Fair Wear Access to Remedy Policy, Approach and related guidance documents.

Please note, if a member brand receives a grievance from a source other than the Fair Wear Grievance Mechanism but would like Fair Wear's support in resolving the issue, the grievance must be added to the Fair Wear system and follow the Fair Wear grievance handling procedure.

The Fair Wear Grievance Mechanism strives to implement the UNGP effectiveness criteria for non-judicial grievance mechanisms. This means that the mechanism is centred around the core criteria of legitimacy, accessibility, predictability, equitability, transparency, and rights compatibility, and always strives to be a source of continuous learning and rooted in continuous engagement and dialogue. The grievance mechanism has also adopted a gender-sensitive approach, as explained in the Gender-based violence and harassment grievances handling guide, ensuring that special considerations are taken to ensure that women and members of the LGBTQI+ community have access to the system and are treated in a fair and sensitive manner.

Fair Wear has aligned most of its language with international standards and the OECD guidelines, leading to the adopting of the term grievances. However, Fair Wear understand both grievance and complaint as a claim about an adverse human rights impact or harm that may or may not be justified, and may use both terms interchangeably.

What is the process that Fair Wear follows?

Grievance Handling Process

High-level process of the Fair Wear Grievance Mechanism:



Urgent issues

Urgent issues are those that need immediate attention and fast action.

Urgent issues follow the same general process as 'normal' issues with a few important exceptions: the timelines are shorter and more guidance is provided for member brands in the form of calls and support from the grievance handlers and the Headquarters' Access To Remedy Team. In the description of the different steps in the process, a paragraph will be dedicated to how it differs for urgent issues.

Issues can be both urgent and sensitive. Whilst there are some issues that will always be classified as urgent and/or sensitive, it is down to the grievance handler's judgement to determine whether a particular case should be considered so.

Urgent issues include, but are not limited to:

- Issues where lives and/or workers' physical safety is threatened.
- Issues surrounding the safety of buildings:
 - ■ Dangerous surroundings
 - ■ Dangers to health, including issues surrounding chemicals, disease, fumes etc.
- Instances or threats of violence

- Child labour
- Forced, prison or slave labour
- Sexual harassment and assault
- Payment of wages below legal minimum wages
- Issues related to the delayed payment of wages

Sensitive issues

Sensitive issues require careful consideration in how to approach the investigation and communication with the supplier, and when to publish the reports.

Sensitive issues follow the same process as 'normal' issues except that the case should not be communicated to the supplier directly after it has been received and a call will take place between the member brand, brand liaison, grievance handler and someone from the Headquarters' Access To Remedy Team. Sensitive issues do not follow different timelines.

Extra care and precautions need to be taken with sensitive issues in all investigation and remediation steps:

- Safeguard rights-holder's anonymity
- Extra guidance provided to the rights-holder to ensure that they fully understand the process and possible consequences
- Including the rights-holder in the decision about the way the case progresses and any steps taken
- Avoids overly restrictive time limits to allow the rights-holder time to understand, process and respond
- Provide social services such as counselling for all victims of violence and harassment
- To not re-traumatise the rights-holder
- Support rights-holders in going to the police or filing a court case
- Refer rights-holders to relevant local organisations for further support
- Differences in the investigation approach

- ■ Unannounced
- ■ Extra care
- ■ Better to take a longer time to prepare investigation to ensure its success than to begin promptly and potential cause increased damage
- ■ In cases where there are relevant organisations involved, to use these to conduct the investigation, for example for gender-based violence and violence and harassment cases, or child-labour cases
- ■ Offsite worker interviews are crucial

It is possible for sensitive issues to also be considered urgent. In those cases, the processes for both sensitive and urgent issues apply.

Sensitive issues include, but are not limited to:

- Child labour
- Sexual harassment
- The rights-holder is in a particularly vulnerable position
- When there is a high likelihood/danger of retaliation against the rights-holder
- When there is a risk that factory management will destroy evidence
- When an unannounced investigation is required
- It occurs in a supplier that is already gaining media attention

Not all issues in a claim must be sensitive. However, if at least one is sensitive, all the issues will follow the process deviations for sensitive issues to ensure that the rights-holder is protected.

What are the separate steps?

Awareness Raising

Purpose: To ensure that rights-holders know their rights, the different avenues available to them for grievance redress, that the Fair Wear Grievance Mechanism is one of these options, and understand how to access the Fair Wear Grievance Mechanism and its process.

As per the Access to Remedy (A2R) policy and the Human Rights Due Diligence (HRDD) policy, the member brand should raise awareness about the Fair Wear grievance mechanism in all its suppliers. Awareness raising begins when member brands engage in dialogue with their suppliers about their work on access to remedy, the grievance mechanism involved, and that receiving grievances should never be considered a bad thing. There are several different ways in which members can raise awareness about the Fair Wear grievance mechanism. All member brands must ensure that, at a minimum, the worker information sheet is posted in all its suppliers. They must also conduct an onboarding training during the first year of business with a new supplier. Below a number of awareness raising activities are further specified, please also refer to the **brand guidance on communicating with your supplier about grievance handling (pending)**.

Worker Information Sheet

The worker information sheet is a poster that contains the Fair Wear Code of Labour Practices and basic information about the grievance mechanism, including the country-specific phone number (for active countries) and the globally available email address (all countries). The member brand must ensure that the worker information sheet is posted in a place where it is clearly visible and easily accessible to workers, so not outside the office of the factory management. The worker information sheet should be posted in the local language(s) and the language(s) of known migrant populations. The member brand is required to collect photographic evidence showing that the worker information sheet has been posted. Worker information sheets can be found [here](#) (please search 'WIS').

Worker Information Cards

The worker information cards contain the same information as the worker information sheet but is formatted on cards the size of a credit card. These can be distributed directly to workers by Fair Wear staff members visiting the factory, such as assessors or trainers, or by brand representatives visiting the factory. Member brands can also request that the factory management insert the worker information cards in all workers' pay slips. Worker information cards can be found [here](#) (please search 'WIC').

Onboarding training

The Fair Wear Onboarding Training for factory management and workers is the first step on the pathway to prevention, mitigation, and remediation. Fair Wear considers raising awareness on labour rights, social dialogue, as well as internal and external grievance mechanisms including the Fair Wear helpline, as a recommended first step for all brands and suppliers.

To support brands' efforts in preventing and mitigating risks in their supply chain, and to facilitate meaningful engagement and dialogue with their suppliers and workers on human rights responsibilities, Fair Wear has designed an Onboarding Training. This two-day training programme provides a basic introduction to the Fair Wear Code of Labour Practices, the Fair Wear grievance mechanism and other grievance mechanisms, as well as social dialogue.

Onboarding factory management and workers on Fair Wear's Code of Labour Practices is the necessary first step towards ensuring sustainable improvements in working conditions and developing social dialogue at the supplier level. By building awareness of labour rights amongst factory workers and management, it lays the ground for all other workplace improvements. For new business relationships it represents a positive starting point for the development of mutual understanding between a brand and its supplier around the shared expectations to respect human rights.

Initial Claim

Purpose: The initial claim refers to the grievance as the rights-holder files it. It is not yet corroborated as a human rights violation. This step involves how a grievance can be filed and by whom, and how to determine whether a grievance is admissible or not.

Ways a grievance can be filed depend on the country. In active countries, there are multiple ways to file a grievance, depending on what messaging services are popular. These include, but are not limited to, phone calls, SMS, WhatsApp, WeChat, Facebook Messenger, emails, and via the Fair Wear website. Grievances can be filed in non-active countries through emails and the Fair Wear website.

The grievance hotline must be a toll-free number where ever possible, and must be accessible both during and outside of working hours. Normal mobile phone charges will apply if it is not possible within a particular country's context to organise a toll-free number. However, to ensure that the rights-holders incur as few costs as possible, the grievance handler will always arrange to call the rights-holder back immediately. This means that Fair Wear will bear the vast majority of the costs associated with filing grievances. In all further communication, the grievance handler will place the call.

Grievances can be filed by:

- Factory workers and former factory workers
- Worker representatives or Worker Committees
- Trade unions, labour rights NGOs, civil society organisations, and other stakeholders
- Information that is brought to light through the media and social media
- Factory management
- Whistle-blowers

Grievances can be filed against:

- Factory management
- Fair Wear member brands

To proceed with the grievance handling procedure, it must be determined whether the grievance is admissible. This is done by answering yes to the following questions:

1. Did it take place in a supplier that a member brand currently sources from or sourced from in the last 180 days?
2. Does it concern one of the eight labour standards or gender-based violence?

What does the first phone call between the rights-holder and grievance handler look like?

The grievance handler asks if the rights-holder used any factory-level systems or other external avenues before turning to the Fair Wear Grievance Mechanism. If they did not but would be willing to, the grievance handler would support the rights-holder in beginning

that process. If they did not and do not want to, then the grievance handler files a grievance directly. If they did try to solve the grievance through the factory-level grievance mechanism, the grievance handler will ask what happened and why the issue was not resolved. After this, the grievance handler files the grievance.

During the conversation, the grievance handler:

- Gathers the details of the harm suffered
- Explains the grievance handling procedure and what the next steps are
- Manages expectations
- Where relevant, shares resources, explains local law, provides contact details of other organisations that may be able to offer additional support
- Agrees upon how to conduct future communication

What are the responsibilities of the member brand(s) involved in the grievance?

The brand should contact factory management to ask for a response. At this point the claim is uncorroborated, and this response is the first step of the investigation. The brand then should promptly relay this response to Fair Wear. If the factory recognises and acknowledges the grievance as true, then the process moves into the remediation phase. If they do not, then an investigation begins.

Investigation

Purpose: The purpose of the investigation is to find evidence that supports or disproves the claims of the grievant.

Fair Wear, as a neutral third party, conducts the investigation of admissible grievances in active countries. In non-active countries, the member brand is required to engage a local organisation or service provider to conduct the investigation. It is crucial that the investigation is conducted by a party that has no conflict of interest to ensure that the process remains impartial and fair, which automatically excludes member brands' local teams. Multiple sources of information should be consulted during an investigation to corroborate the claim with multiple sources. The exact combination of sources will depend on the details of each case. The grievance handler will develop and implement the

investigation plan, including which sources of information to consult. In complex grievance cases that include multiple (structural) issues an assessment may be the most appropriate method of investigation. In such cases, the member brand will be invoiced for the costs of the assessment as this falls outside the costs of the member fee.

Sources of information:

- Fair Wear assessment report no older than 90 days
- Worker interviews, both off- and on-site
- Interviews with factory management, HR manager, and/or other members of staff
- Meeting with trade unions, worker representatives, brands
- Documents inspection
- Factory inspection
- Interviews with local stakeholders such as trade unions, NGOs, business associations and local authorities. This information can be taken from the country study or from additional interviews, dependent on the case. These interviews are regularly conducted by Fair Wear or by a local contact person and are reported in the relevant country studies. The information is updated through regular contact and exchange with stakeholders. Depending on the grievance, additional interviews with stakeholders can provide an important perspective, needed to be able to draw a conclusion on the case
- Local laws and legislation and consultation with legal experts

Outcomes of the investigation:

- **Grounded** means that evidence has been found that supports the claim of the grievant. If the factory recognises the grievance and the investigation is skipped, the issues can be considered grounded.
- **Not Grounded** means that the investigation found evidence that disproves the claims made in the grievance.

Remediation

Purpose: The purpose of the remediation is to return the rights-holder to the position they would have been in had the harm not occurred and to implement measures to prevent the harm from reoccurring. A key aspect of remediation is to assess and address the root causes, particularly when these are found in the brands' purchasing practices. The member brand must conduct a root-cause analysis for every grievance received.

Part of each case is that the factory-level grievance mechanism is not functioning effectively, therefore part of the long-term remediation/preventative aspect of each grievance is to assess and improve the factory-level grievance mechanism. Please refer to the [Fair Wear Factory-Level Grievance Mechanism Tool and Guidance \[link\]](#).

Remediation is a responsibility shared between the brand and the supplier.

What the exact remedy looks like is dependent on the case. The purpose of remediation is to restore the rights-holder to their rights, as though the harm had not occurred.

Remediation can include:

- An apology
- Rehabilitation
- Restitution
- Reinstatement
- Provisions to ensure the harm cannot reoccur
- Compensation (financial or other) for the harm
- Punitive sanctions
- Cessation of a particular activity or relationship
- Some other form of remedy agreed by the parties

The remediation activities include both actions to restore the rights-holder to their rights and preventative activities to ensure that the violation does not reoccur. This includes addressing the root cause of an issue, which can be related to the member brand's purchasing practices. Addressing these is a unique feature of the Fair Wear grievance mechanism and places more responsibility with the member brands.

Preventative measures can include:

- Training modules
- Adjusting purchasing practices
- Updating factory policies and communicating these to the workers
- Updating systems, such as time recording, payrolls, age verification etc.

Verification

Purpose: To collect evidence that demonstrates the implementation of the remediation activities.

The member brand collects evidence and uploads it into the information management system. What can be considered as appropriate evidence depends on the particulars of the case, but can include:

- Documents - for example, proof of payment, working hours, updated policies, etc.
- Photographs
- Videos

Validation

Purpose: To evaluate whether the remediation had the desired impact, i.e. were the remediation activities implemented as agreed upon, and did they solve the issues?

The validation is made up of several parts:

- Checking the collected evidence – the grievance handler checks the documents and other evidence uploaded by the member brand and any evidence received directly from the grievant. Remediation can also be validated through a validation assessment.

- Asking the rights holder whether the remediation activities were implemented, by checking whether they know of, saw or experienced the implementation
- Asking the rights holder if the activities solved their issue
 - ■ If it is no longer possible to validate with the rights-holder and if the issue is structural, it is possible to validate with other affected workers

In this process, there are several things possible, leading to different outcomes:

- The validation finds the issue **Resolved** when the validation showed that the remediation activities were implemented and solved the issue. The process continues onto final evaluation and closing.
- The validation finds the issue **Not resolved** when the validation showed that the remediation activities were implemented but did not (fully) solve the issue. In this case, either:
 - ■ New remediation activities can be recommended and implemented, which will in turn need to be verified and validated again.
 - ■ Remediation activities can (no longer) be implemented. The process continues onto final evaluation and closing.
- The validation finds the issue **Inconclusive** when the issue is individual, and it is not possible to confirm with the rights-holder whether the remediation activities were implemented or if it solved their issues (e.g. when the grievant is no longer reachable after one month and several attempts to contact). In case of collective or structural issues (e.g. overtime, health & safety issues etc), it may be possible to validate with other affected workers/rights-holders.

Evaluation

Purpose: To determine whether the rights-holder is satisfied with the outcome and whether they have any feedback to improve the process. Furthermore, the performance of the member brand will also be briefly evaluated by the grievance handler.

There are two main reasons as to why this step is important:

1. To ensure the centrality of the rights-holder and to make sure there is meaningful stakeholder engagement on both the outcome of the grievance and the grievance handling process in general.
2. For the grievance handler to provide feedback about the member brand about how well they followed the Fair Wear Access to Remedy policy suite.

Closing of the Grievance

Purpose: The closing of the grievance is when the grievance handling process is finished and the case can be closed. There are several different reasons to close a grievance, including when the issue(s) is not grounded or we lost touch with the grievant, when the issue(s) has been resolved, or when it is no longer possible to resolve it.

After a grievance has been remediated, verified and validated, a grievance can be closed in the following ways:

- The issue is marked **Resolved** when the issue was found grounded, and the validation found the issue fully remediated.
- The issue is marked **Not Resolved** when the issue was found grounded, and the validation found the issue not (fully) remediated.
- The issue is marked **Inconclusive** when the issue was found grounded, and the validation could not be completed.

Before entering the remediation, a grievance case can be closed without being marked Resolved, Not Resolved or Inconclusive when:

- The issue is not grounded.
- The grievant no (longer) consents to proceed or is no longer reachable after one month of lost contact. The company(ies) involved in the grievance ceases to be a member of Fair Wear and the grievance is no longer admissible, in which case Fair Wear may seek to transfer the case to other existing and legitimate mechanisms.

Publication

Purpose: The purpose of the publication is to ensure transparency towards stakeholders regarding the steps each grievance goes through and about how member brands perform.

There are multiple moments after which a grievance report is published or updated:

1. After the conclusion of the investigation, and includes details of:

■ The initial claim:

- ■ Country
- ■ Member brand
- ■ Labour standard(s) and corresponding issue(s)
- ■ Filing party (e.g. worker(s), former worker(s), trade union, CSO, LRO, media, factory management)
- ■ Accused party (e.g. factory management or Fair Wear member brand)
- ■ Short narrative description of the claim of the grievant

■ The investigation:

- ■ What investigation methods were used?
- ■ What evidence was found?
- ■ What is the conclusion of the investigation, i.e. are the claims grounded or not grounded?
- ■ A short narrative description

2. When the grievance is resolved or closed and includes details of:

■ The verification

■ The validation

■ The evaluation

■ Whether the grievant was satisfied with the outcome and process?

- Whether the member brand acted according to the Fair Wear policies and recommendations?
- Whether the case is resolved or closed

The publication of grievance reports is an important part of the legitimacy of the Fair Wear grievance mechanism. It publicly holds member brands accountable for following up on grievances in adherence with the Fair Wear Access to Remedy Policy. It functions both as a showcase for member brands' best practices, the proverbial carrot, and calling out members that are not following up as desired, the stick.

Scope

Scope of Fair Wear Grievance Mechanism:

- Member brands' tier-one suppliers are currently sourced from or were sourced from up to 180 days ago.
- Issues related to the Fair Wear code of labour practices and gender-based violence.

Difference between active and non-active countries:

- Active:
 - ■ Fair Wear grievance handler operating hotline
 - ■ Local team to conduct investigation
 - ■ Knowledge of local context and legal considerations
- Non-active:
 - ■ No grievance handler operating hotline
 - ■ Complaints@fairwear.org used to receive grievances
 - ■ Member brand responsible for commissioning a local partner to conduct the investigation and support remediation where applicable

Who is responsible for what?

Fair Wear

Fair Wear provides a channel for workers/rights-holders to disclose human rights violations in Fair Wear member brands' supply chains.

Fair Wear is responsible for:

- Channel
- Infrastructure (in active countries)
- Processes – design and development
- Materials for awareness raising
- Qualified staff, including grievance handlers and trainers
- Ensuring the system adheres to relevant international standards, such as the UNGP effectiveness criteria for non-judicial grievance mechanisms
- Keeping up to date with relevant legislative developments
- Analysing the data that arises from the grievance mechanism, that can then be used in risk-scoping exercises
- Arranging structural collaborations with other industry initiatives as described in the [Approach](#) and in the section ***Collaborating on grievances*** below
- Guidance on how to deal with grievances in non-active countries

Member brands

The Fair Wear Grievance Mechanism does not absolve member brands of their responsibility to provide access to remedy to workers in their supply chains. Indeed, the grievance mechanism does not serve as an outsourcing or tick-box exercise. Where Fair Wear provides the infrastructure and parameters for grievance handling, the member brands ensure that this is implemented in their supply chains. The member brands have a relationship with their suppliers and, as such, are responsible for all communication with the suppliers.

Member brands are responsible for:

- Conducting awareness-raising activities
- Engaging in reoccurring conversation with suppliers about the importance of access to remedy and making clear that it is not seen as a bad thing to receive grievances
- Ensure that their supplier data is up to date in the system
- Reaching out to the supplier after a grievance has been received to ask for a response
- Remaining in close contact with the supplier during the process of solving the grievance, including arranging/facilitating on-site investigations, the request of documents and updating the supplier on findings and next steps
- Remediation – working together with the supplier to remediate the issue (plus remediating directly if the supplier refuses to do so)
- Prevention – working together with the supplier to implement preventative measures to stop the issue from reoccurring
- Remediation/prevention – conducting a root cause analysis to see whether any of the issues are rooted in their own purchasing practices
- Prevention – assessing the factory-level grievance mechanism and determining follow up steps to improve the effectiveness of this mechanism
- Ensuring there is always a designated person to deal with grievances, this includes making sure that there is a back-up person for when the lead person is sick/on holiday/otherwise unable to take up the grievance
- Following the relevant learning modules and being aware of how the system works

Noncompliance

Member brands are expected to adhere to the Fair Wear Access to Remedy Policy and are assessed on this during the yearly brand performance check.

If a member brand does not implement the agreed upon remediation activities, Fair Wear will report this on the website as part of the reporting process of the grievance mechanism.

Costs

The way the costs for the grievance mechanism are broken down is related to who is responsible for each step in the process.

Covered by Fair Wear, vis-à-vis the membership fee:

- The grievance handling system
- The presence of a grievance handler in all active countries
- Development of awareness-raising materials
- The receiving of the grievance
- The investigation (except the costs for a full assessment if required)
- Recommending remediation activities
- Validating the remediation of the issues (except the costs for a validation assessment if required)
- Ensuring evaluations take place with the rights-holder
- Concluding the case
- Preparing the reports, editing them and publishing them on the Fair Wear website

Excluded from the membership fee and therefore to be invoiced to brands after the conclusion of each grievance case:

- If the issues of the grievance are extensive and affect many workers, or if findings are recurring, a full or modular assessment can be the best investigation tool. This applies as well for validation assessments used for validation of the remediation. The costs of this assessment will be covered by the member brand
- Support in handling grievances that are received in non-active countries

Collaborating on grievances

At Fair Wear, we believe that, with more collaboration, leverage and resources, we can provide better access to remedy for workers. This is why Fair Wear encourages its members to work together in remediating grievances. Besides, Fair Wear encourages its members to collaborate with other (non-member) brands sourcing from factories where complaints are raised, as described in Fair Wear's Access to Remedy Approach and Policy (linked below).

To help in doing this, Fair Wear, together with amfori and the Partnership for Sustainable Textiles signed a Protocol (available below) laying out the steps to work together on complex grievances raised at factories shared between their members.

↓ **Collaboration protocol (FW, PST, amfori)** PDF

🔗 **APPROACH**

Access to Remedy Approach

The Access to Remedy Approach is part of the Access to Remedy Policy Suite and goes into effect on 1 January 2025. The approa...

Open resource →

📄 **POLICY**

Fair Wear Access to Remedy Policy

The Fair Wear Access to Remedy Policy sets out the requirements Fair Wear has for its brands in providing access to remedy in...

Open resource →

How does Fair Wear handle/store the information collected?

The data collected through the grievance mechanism will:

- Be stored securely and with the utmost care of personal details and confidentiality
- Parts will be published on the Fair Wear website to ensure transparency to our stakeholders
- Be used to inform the brand performance check
- Be used to inform the risk scoping and the rest of the HRDD system

- Be analysed to determine trends, reports of this may be published
- Shared with stakeholders in an aggregate way when necessary/requested
- Shared with researchers in an aggregate way when necessary/requested