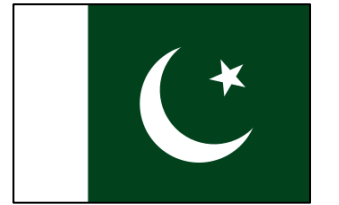




## THE GREEN PAKISTAN PROJECT



# WORKSHOP: The Importance of Effective Grievance Mechanisms for Pakistan





# GREEN PAKISTAN PROJECT



**Preparing Associations For EU Green Deal,  
EUCSDDD & LKSG-German Due Diligence Act**

[www.greenpakistan.de](http://www.greenpakistan.de)



## **Fact Finding Mission    MOU Signing Ceremony    Visits in 52 Companies**

**Alliance  
for more Sustainability**

**VFI mit +200  
verbundenen  
Unternehmen**

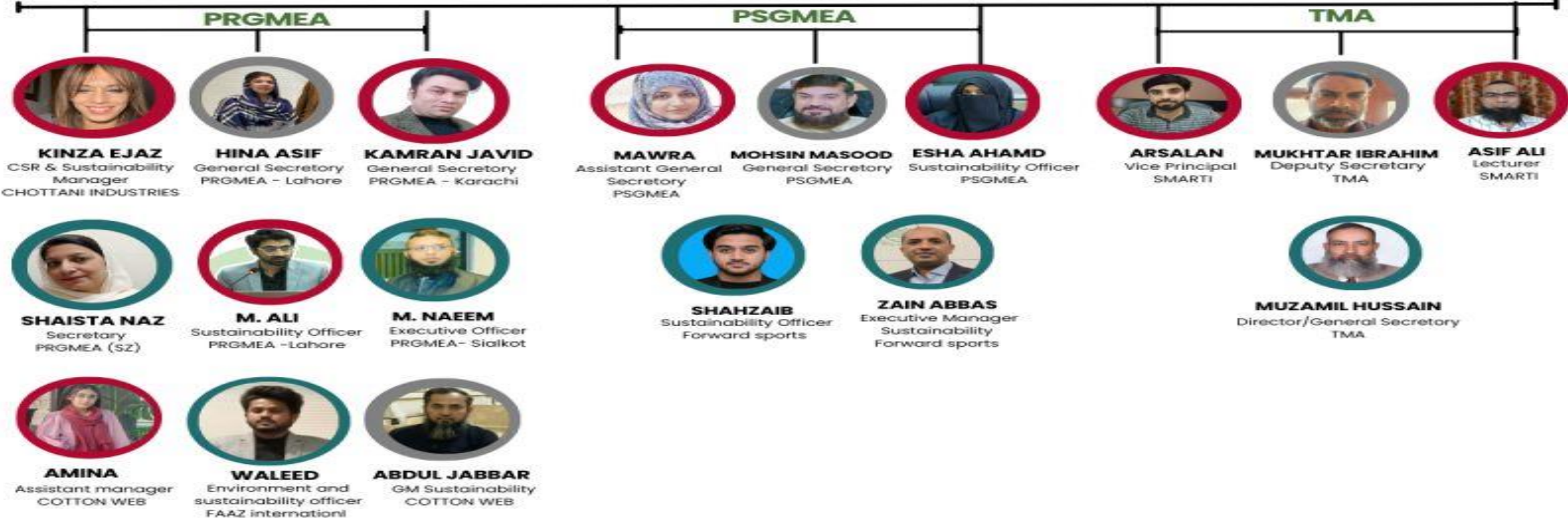
**3 pakistanische  
Verbände mit + 2.500  
Mitgliedern**

**53 Mitglieder wurden  
ausgewählt, besucht und  
das Self-Assessment  
gestartet**

# GREEN PAKISTAN PROJECT

Preparing Associations For EU Green Deal, EUCSDDD LKSG-German Due Diligence Act

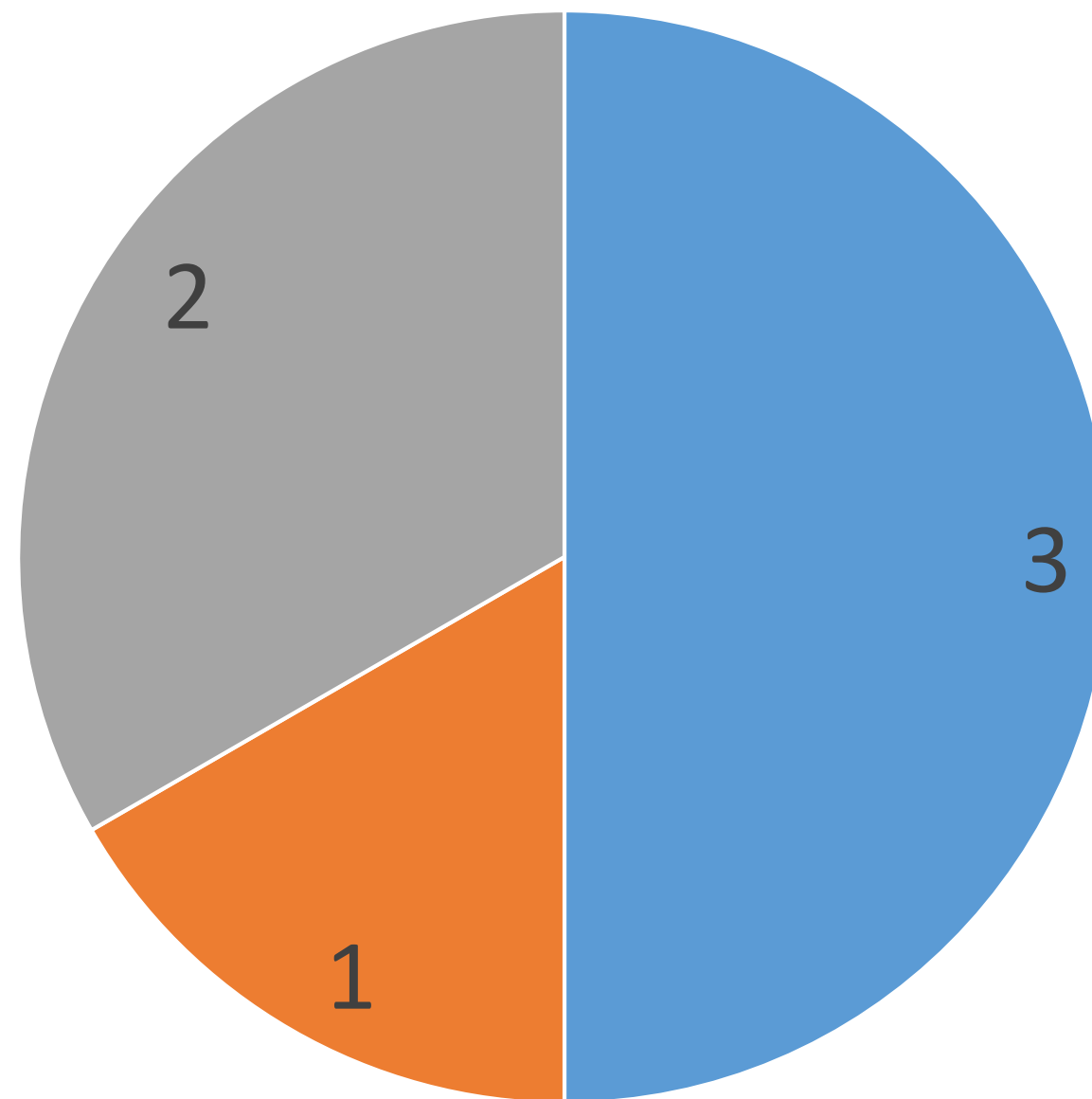
## Meet the Nominated Association-Level Sustainability Services Team





# Overview of Associations

## Sustainability Reports



■ PRGMEA   ■ PSGMEA   ■ TMA

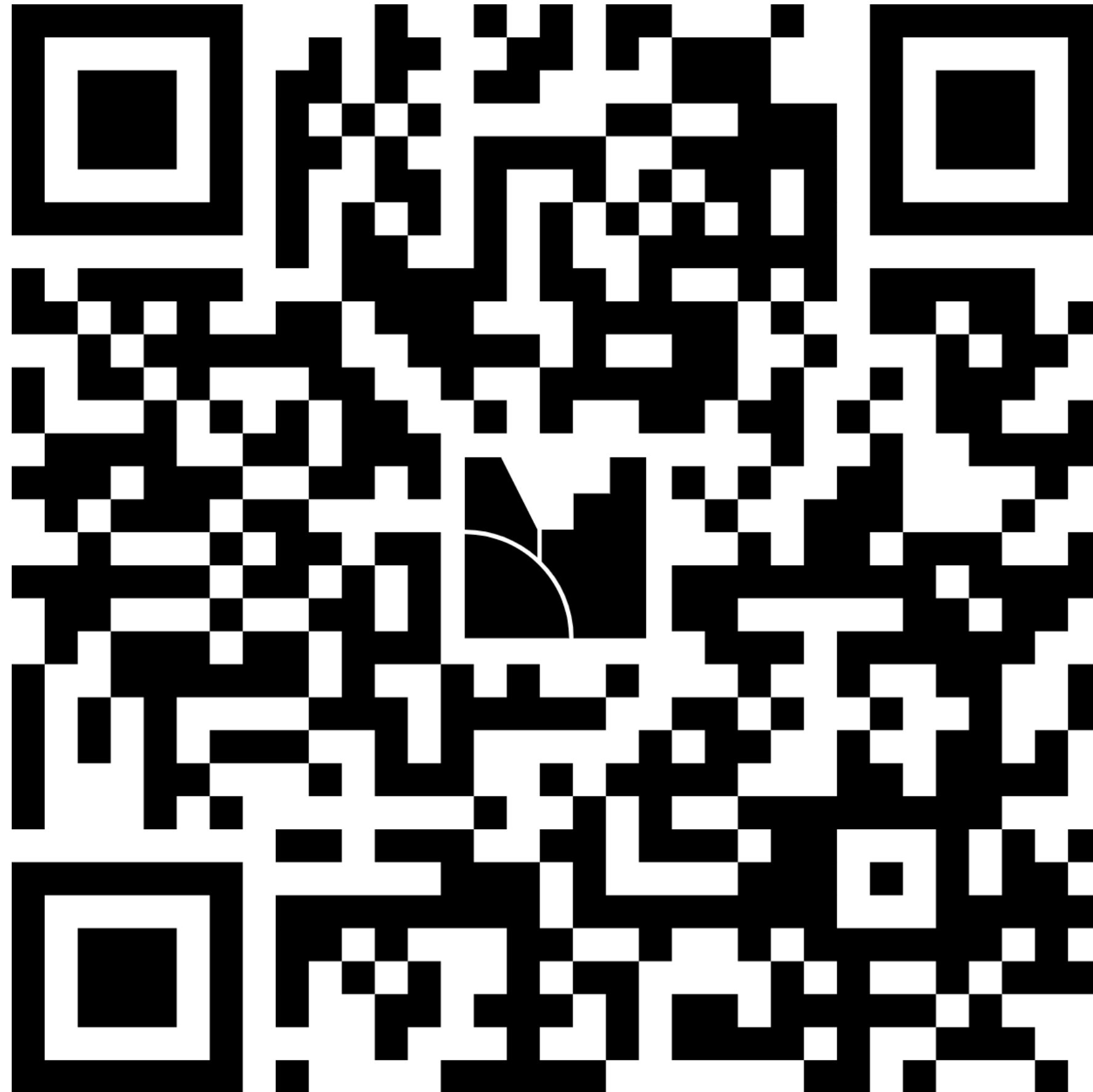




# ICEBREAKER

Go to [menti.com](https://menti.com)  
Enter Code:

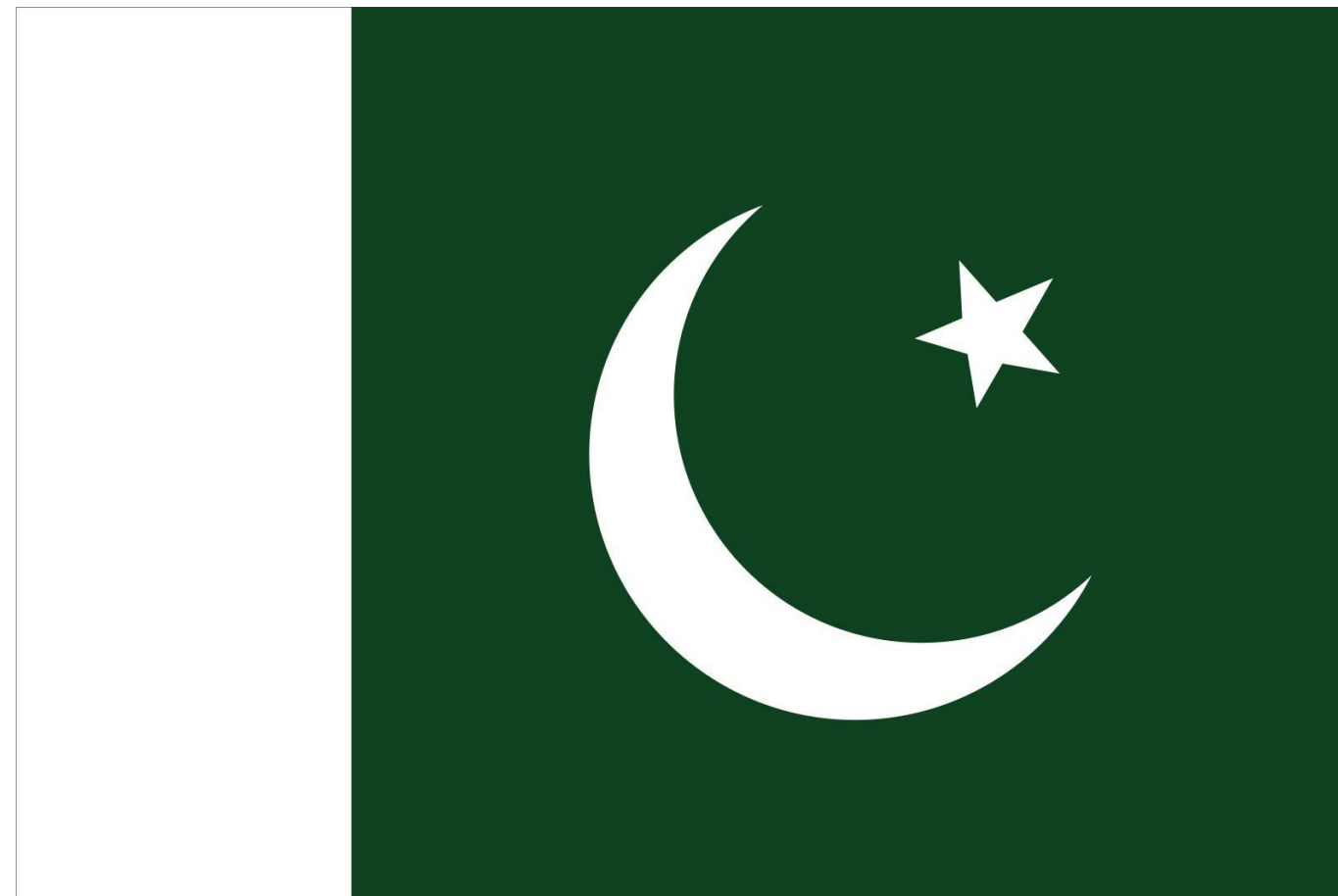
**3219 6755**



Supported by the



# What happened on 10<sup>th</sup> December 1948 ?



Supported by the



# Pakistan Signed the UDHR



*Eleanor Roosevelt, the first lady of the United States, who chaired the UN Human Rights Commission and was instrumental in drafting the Universal Declaration of Human Rights (UDHR).*

1948

Supported by the



## Human Rights Commitments & Compliance Frameworks

Framework	Core Principle	Pakistan's Role	Relevance Today
Universal Declaration of Human Rights (UDHR, 1948)	Human dignity, equality, right to remedy (Art. 8, 23–25)	Pakistan voted in favor in 1948	Foundation of all later treaties, sets baseline for rights at work
ILO Core Conventions	No forced/child labor, freedom of association, equal pay, non-discrimination	Pakistan ratified all 8 core conventions	Operationalizes UDHR in workplace; benchmark for labor rights
GSP+ (EU, since 2014)	Tariff-free access tied to 27 international conventions (15 on HR & Labor)	Pakistan beneficiary of GSP+	Trade access conditional on implementing UDHR/ILO standards
EU CSDDD (2024–2026 rollout)	Mandatory due diligence on human rights & environment across supply chains	Impacts all Pakistani exporters to EU	Requires grievance mechanisms, risk assessments, corrective actions
Grievance Mechanisms (UNGPs, OECD, CSDDD)	Access to remedy, early warning, worker voice	Factories & suppliers expected to implement	Proves compliance, builds trust, prevents trade/brand risks



# JUSTICE FOR **PRIYANTHA**

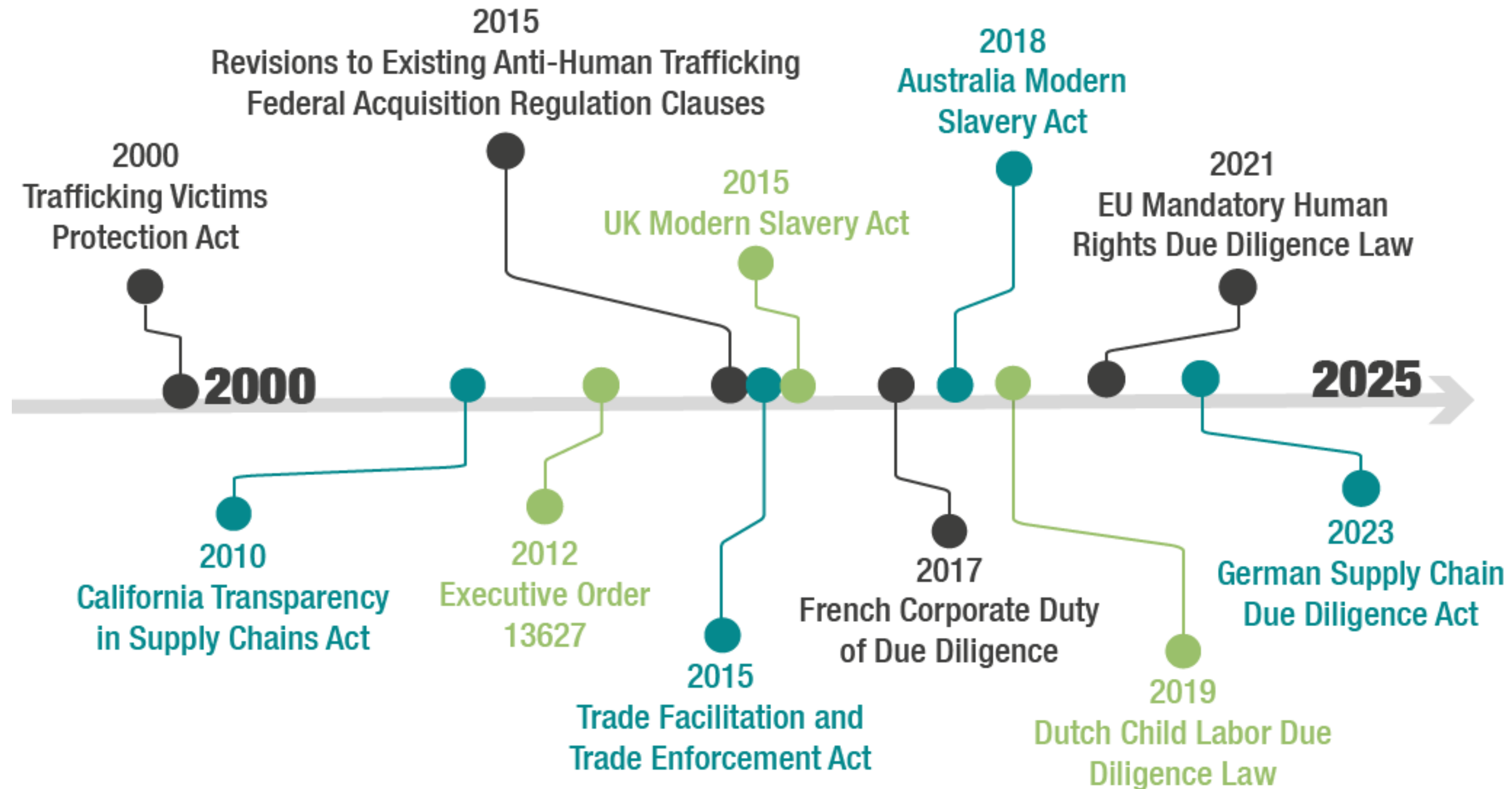
 HUMAN RIGHTS COUNCIL PAKISTAN



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## OVERVIEW OF GLOBAL DUE DILIGENCE REGULATIONS:



Supported by the



2024	<b>EU Corporate Sustainability Due Diligence Directive (CSDDD)</b>			
2023	<b>German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)</b>		<b>EU Corporate Sustainability Reporting Directive (CSRD)</b>	<b>EU Sustainability Reporting Standards (ESRS)</b>
2022	<b>EU Non-Financial Reporting (NFR) Directive</b>	<b>Norway The Transparency Law</b>	<b>USA Slave-free Business Certification Act</b>	<b>Japan Guidelines on Respecting Human Rights in Responsible Supply Chains</b>
2021	<b>Netherlands Bill for Responsible and Sustainable International Business Conduct</b>		<b>USA Uyghur Forced Labor Prevention Act</b>	
2020	<b>Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act</b>			<b>EU Taxonomie</b>
2019	<b>Dutch Child Labour Due Diligence Act</b>	<b>Australia Modern Slavery Act</b>	<b>EU European Green Deal</b>	
2017	<b>France The Duty of Vigilance Act</b>	<b>USA Executive Order on the Global Magnitsky Human Rights Accountability Act</b>		
2016	<b>UK Modern Slavery Act</b>	<b>German National Action Plan for Business and Human Rights</b>	<b>OECD Guidelines for Multinational Enterprises</b>	
2012	<b>USA The California Transparency in Supply Chains Act</b>			
2011	<b>UN Guiding Principles on Business &amp; Human Rights</b>			
	<b>ILO Conventions and Guidelines</b>			

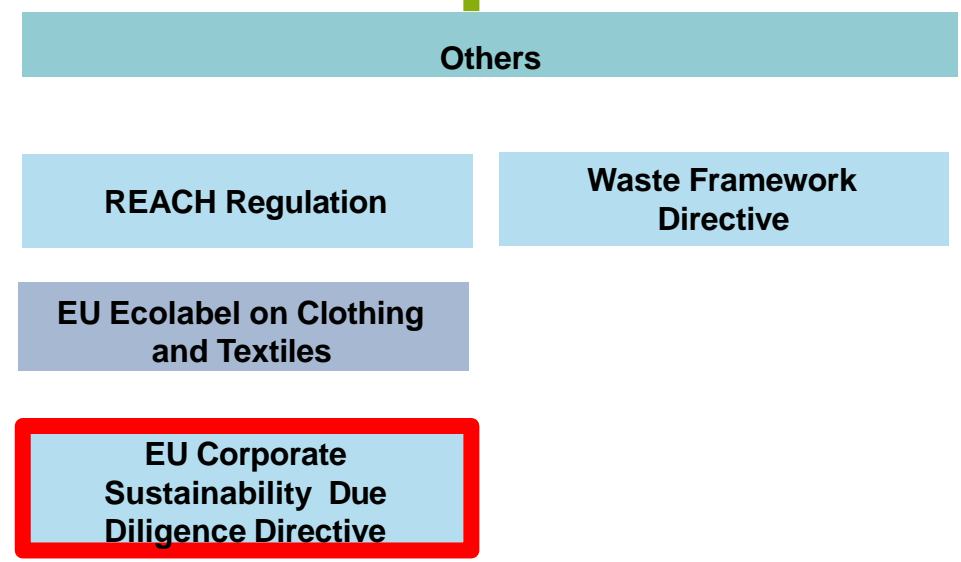
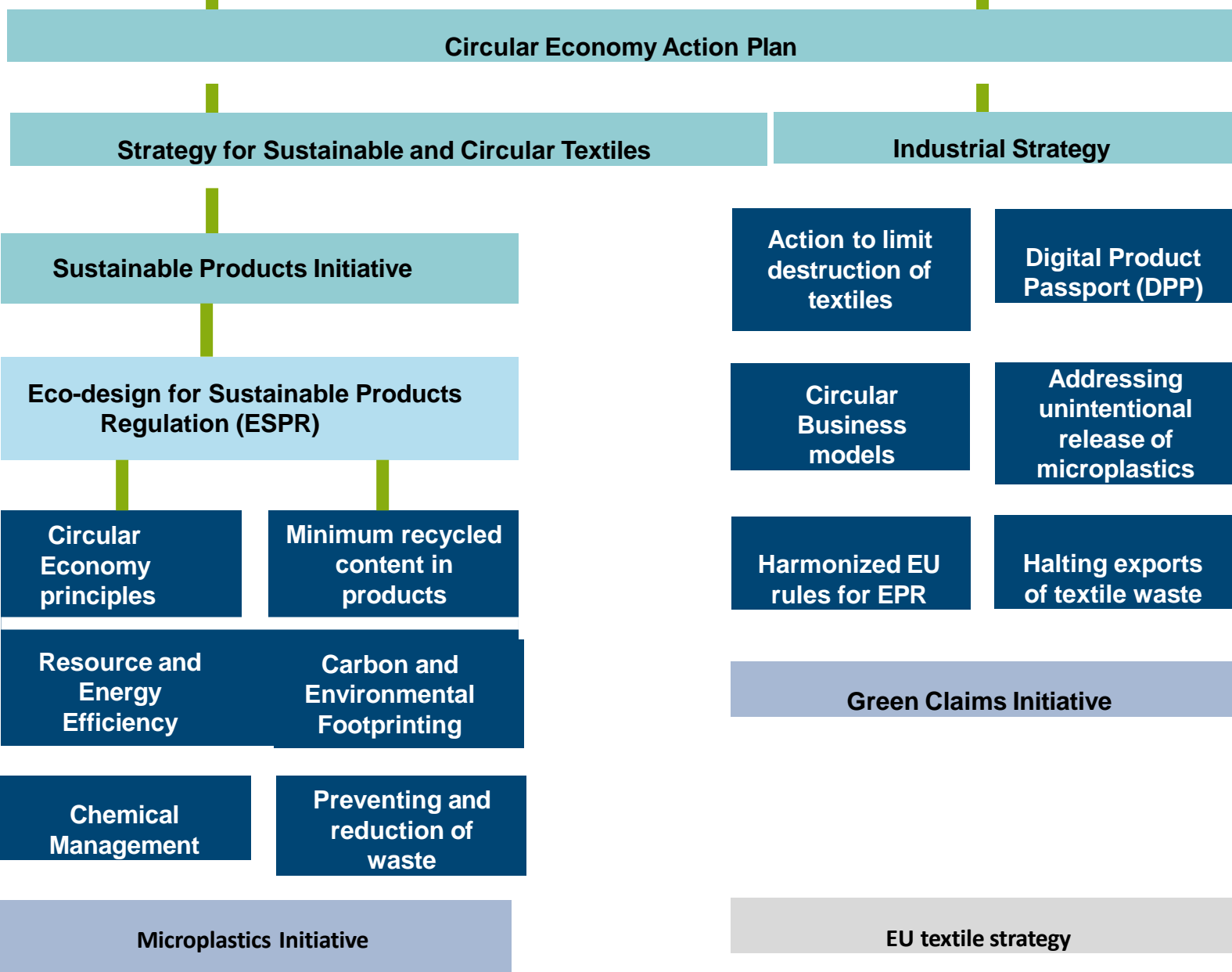
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# European Green Deal



■ Framework    
 →   Umbrella Initiative    
 →   Legislation    
 →   Initiative    
   Key Topics/Actions

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# HUMAN RIGHTS & ENVIRONMENTAL DUE DILIGENCE FUTURE OF SUSTAINABILITY & GLOBAL TRADE



From "Nice to Have"

## CASE STUDY: UFLPA

- December 23, 2021
  - Hundreds of Shipments withheld at US Ports
  - Shifting Sourcing Strategies
  - **80%** of companies moving out of china
  - Supply Chain Traceability
  - **90%** of companies mapping supply chains to Tier 3 suppliers
  - **82%** of companies planning to allocate MORE resources toward sustainability and compliance
- USFIA Fashion Industry Benchmarking Study 2024

**THE CHANGING GLOBAL SUSTAINABILITY LANDSCAPE**

To "Must Do"

**GERMAN SUPPLY CHAIN DUE DILIGENCE ACT (LKSG)  
January 1, 2023**

**EU CORPORATE SUSTAINABILITY DUE DILIGENCE DIRECTIVE  
July 25, 2024**

**US GREEN TRADE STRATEGY  
Jun 30, 2022**

**THE ENHANCEMENT AND STANDARDIZATION OF CLIMATE-RELATED DISCLOSURES FOR INVESTORS**  
March 6, 2024



**U.S. Securities and Exchange Commission**

Human Rights/Social Sustainability

Incentivize Green Trade

Environmental Due Diligence

Strengthen Environmental Enforcement Posture

Supplier Assessments

Accelerate Green Innovation

For EU and Non-EU Supply Chains

Improve Climate Resilience and Resource Efficiency



**ESG DEVELOPMENTS IN PAKISTAN**

- SECP ESG Disclosure Guidelines **June 13, 2024**
- PSX Primer on ESG **June 16, 2024**
- **36** ILO Conventions signed by Pakistan
- Over **30** Multilateral Environmental Agreements (MEAs) signed by Government of Pakistan

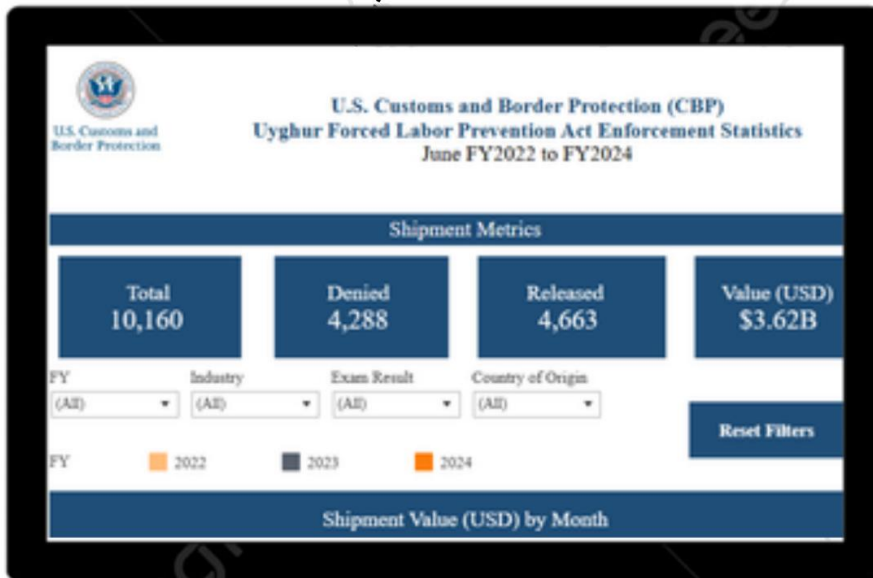
**GROWTH IN ESG FOCUSED INVESTMENTS**

By 2026, ESG-focused investments are expected to soar by **84%**, reaching \$33.9 trillion  
PwC's 2023 Global Asset and Wealth Management Survey

The majority of **investors (89%)** consider ESG issues when making decisions, while only 13% see it as a passing like/dislike  
ESG Investing Statistics, Data & Trends (2024)

A notable **88%** of consumers demonstrate increased loyalty to businesses that advocate for social or environmental issues  
Forbes: Futerra Survey

**EXPORTS**



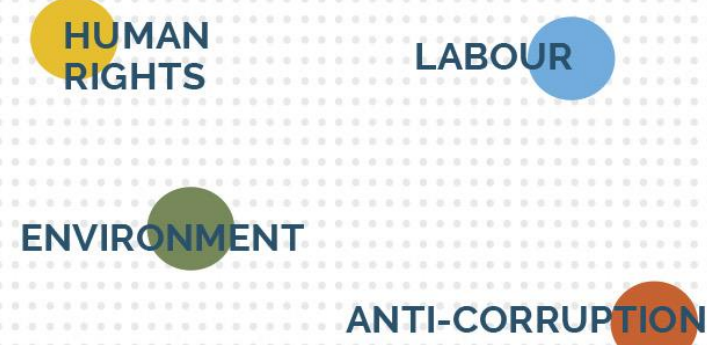
**A CHALLENGE & OPPORTUNITY FOR PAKISTAN**

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# THE TEN PRINCIPLES

of the United Nations Global Compact



- 1 Support and respect the protection of internationally proclaimed human rights.
- 2 Not be complicit in human rights abuses.
- 3 Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 4 Support the elimination of all forms of forced and compulsory labour.
- 5 Support the effective abolition of child labour.
- 6 Support the elimination of discrimination in respect of employment and occupation.
- 7 Support a precautionary approach to environmental challenges.
- 8 Undertake initiatives to promote greater environmental responsibility.
- 9 Encourage the development and diffusion of environmentally friendly technologies.
- 10 Work against corruption in all its forms, including extortion and bribery.



Source: UNGC

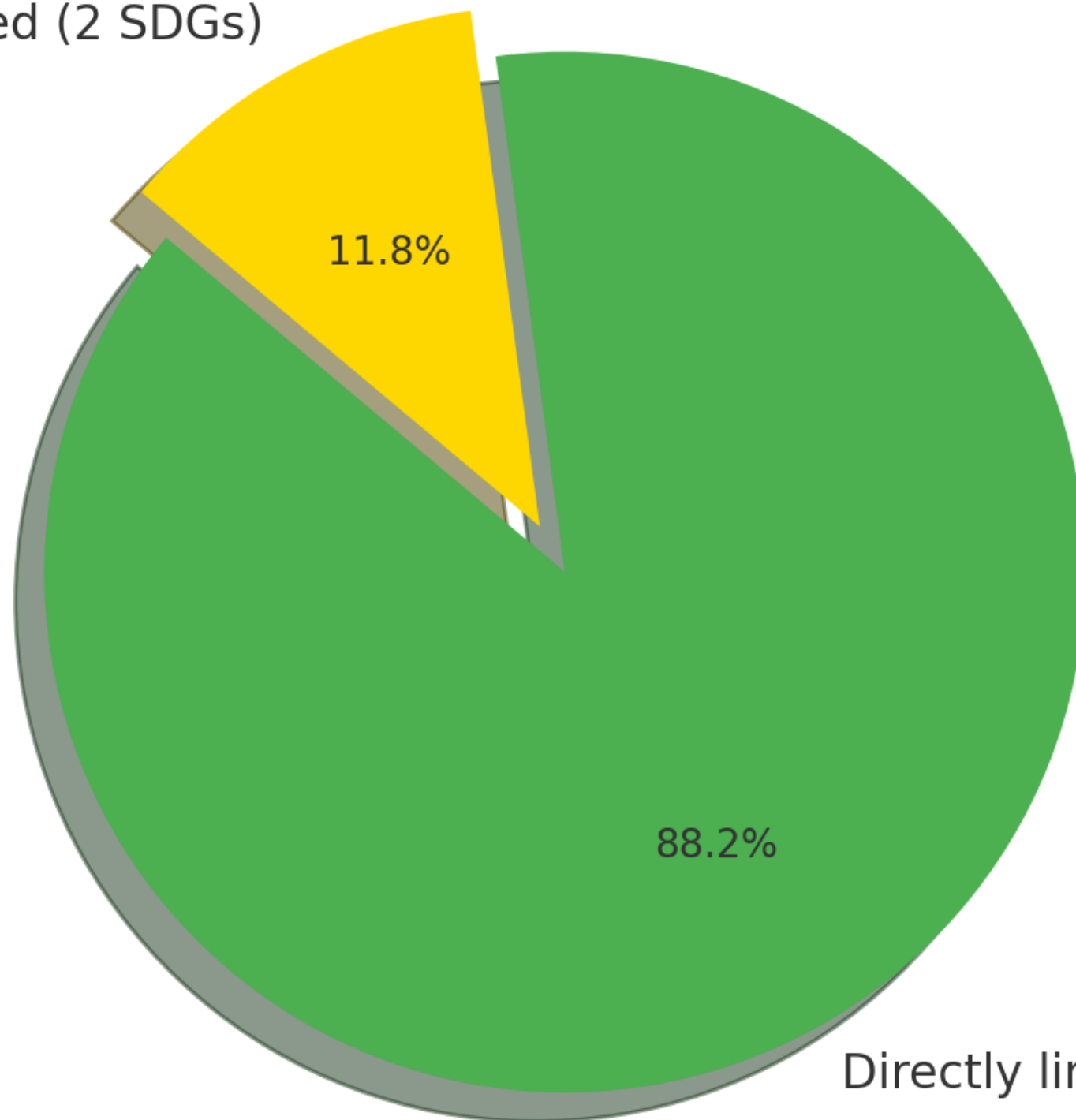
The value of sharing principles

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## SDGs Related to Human & Labour Rights (Broader View)

Less directly linked (2 SDGs)

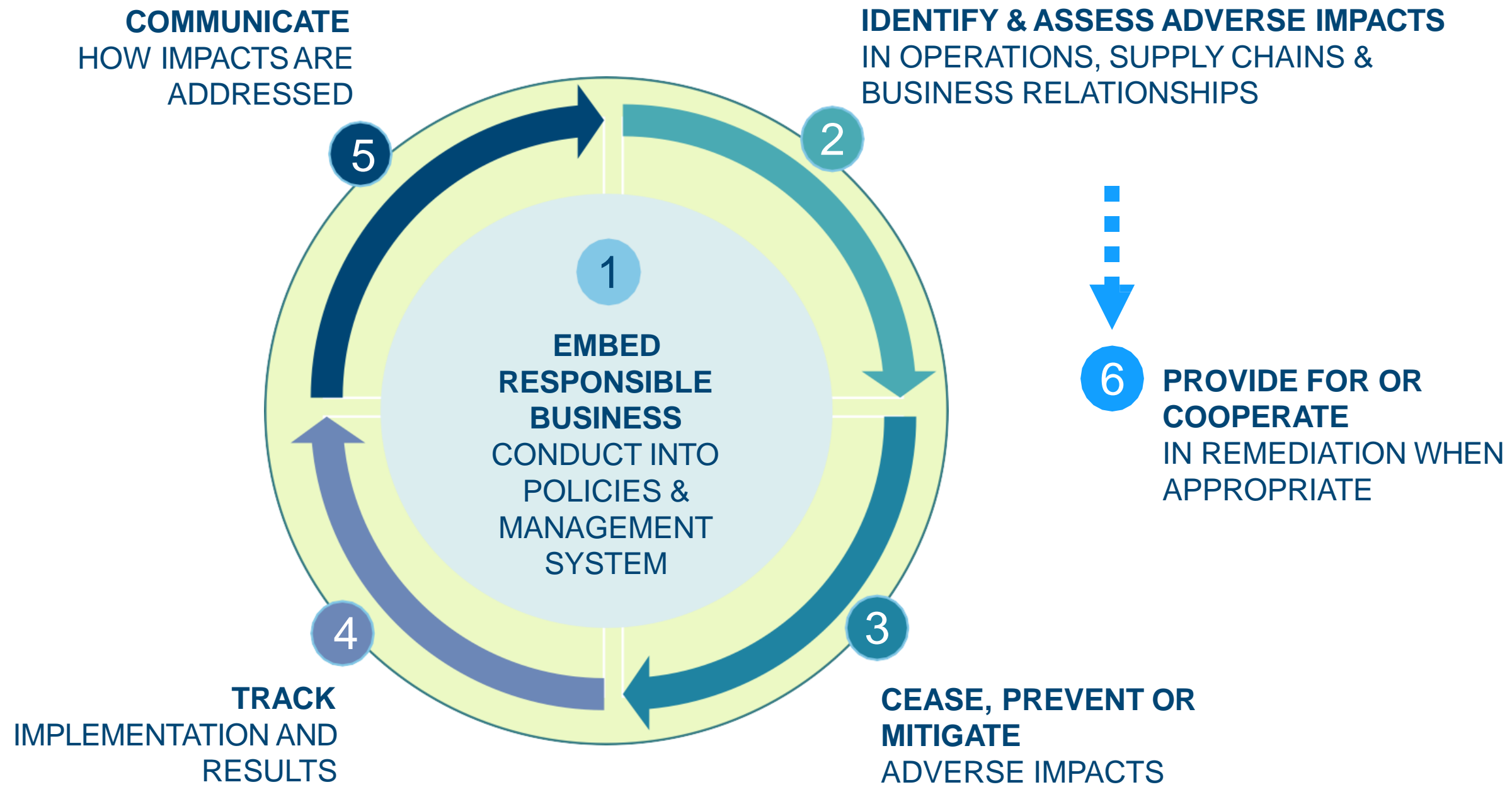


Directly linked to Human & Labour Rights (15 SDGs)

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# HOW SHOULD COMPANIES CONDUCT HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE (HREDD) AS PER OECD PROCESS ?



Source: [OECD \(2018\)](#)

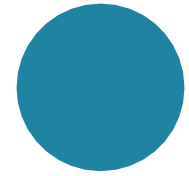
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# CSDDD: DUE DILIGENCE OBLIGATIONS

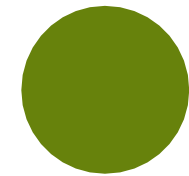


**Climate Transition Plan**  
Adopt and implement plan to ensure that business model and strategy are in line with Paris Agreement



## Reporting

Public communication on due diligence



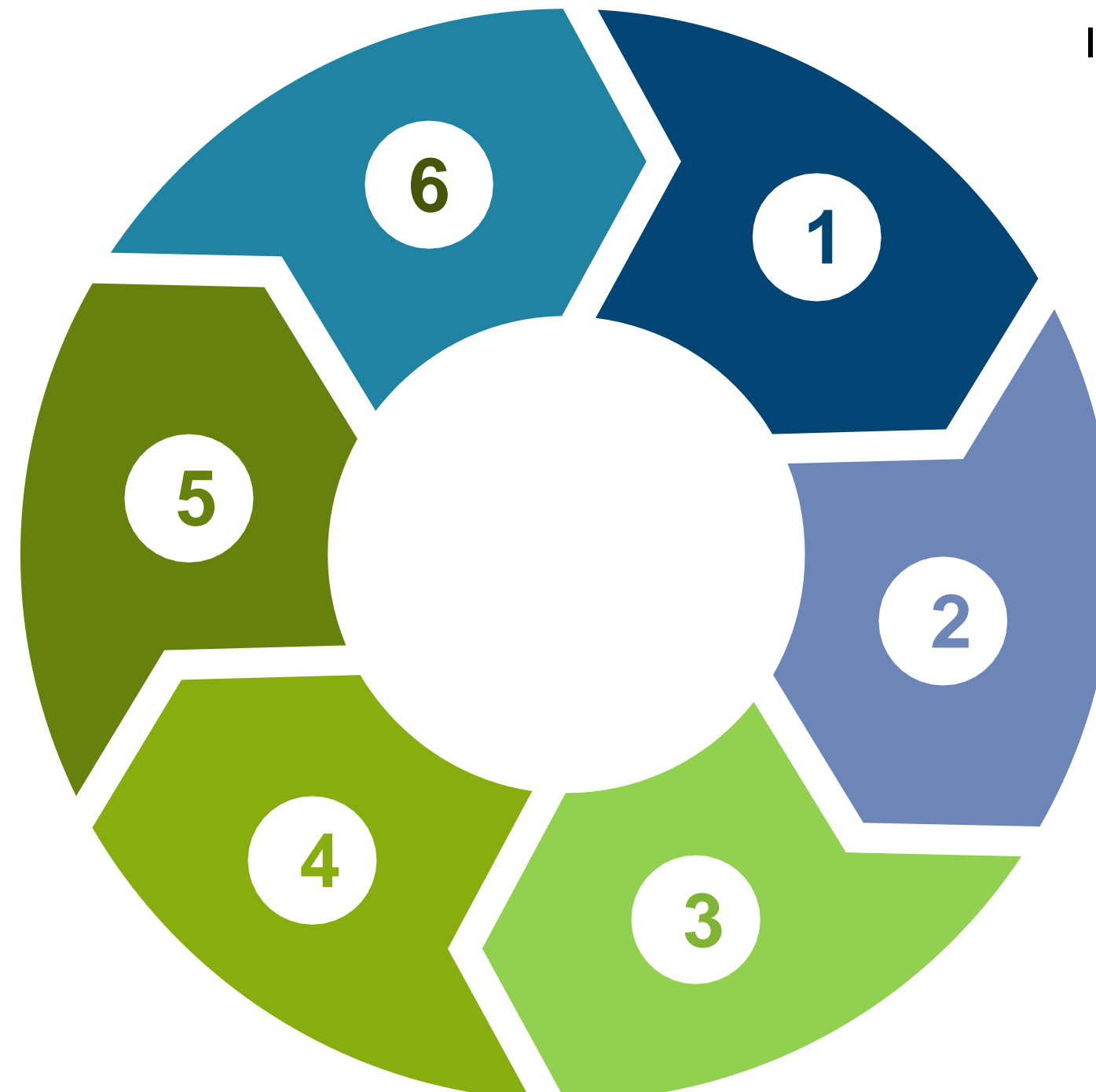
## Monitoring

Monitoring of the effectiveness of the due diligence policy and measures



## Complaint Procedure

Establishment and maintenance of a notification mechanism and complaints procedure



## Company Policy

Integration of due diligence into policies and risk management systems

## Risk Analysis

Identification and assessment of actual or potential adverse impacts; where necessary, prioritization of potential and actual adverse impacts

## Prevention & Mitigation

Prevention and mitigation of potential & ending and minimising actual impacts; providing remediation, carrying out stakeholder engagement

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## UNDERSTANDING THE SUPPLY CHAIN:

### TIER 4

Raw Material  
Extraction



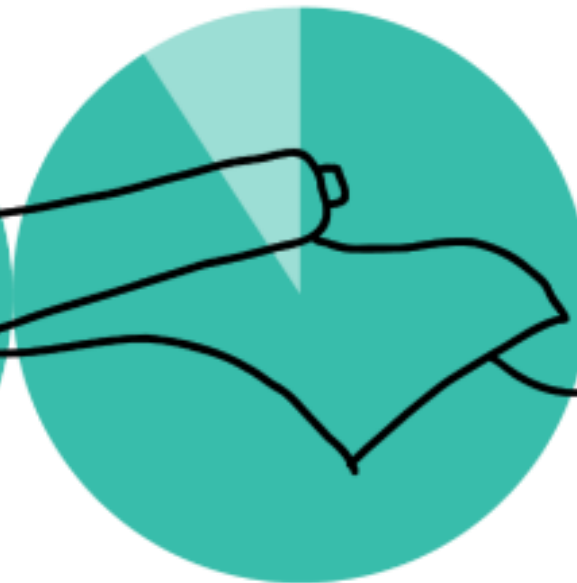
### TIER 3

Raw Material  
Processing



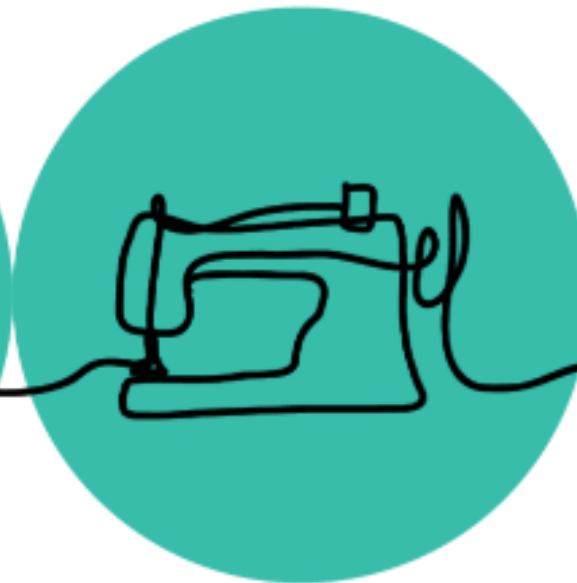
### TIER 2

Material Production



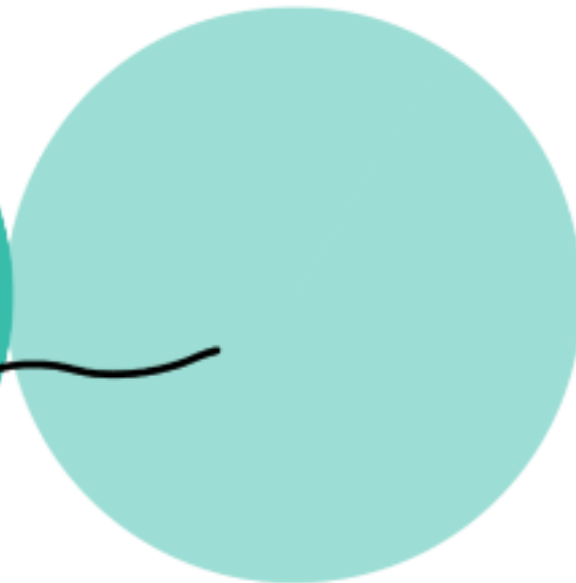
### TIER 1

Finished Product  
Assembly



### TIER 0

Office, Retail,  
Distribution Centres



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# CSDDD: WHO IS AFFECTED AND

## HOW?

### Direct and indirect business partners:

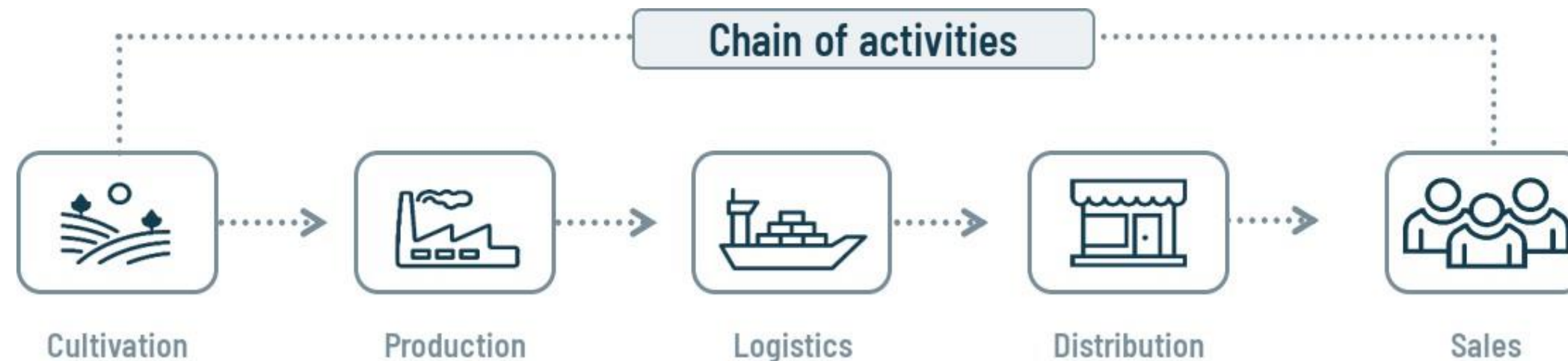
- Are part of the chain of activities
- Possible differences in relation to preventive and corrective measures

### Own operations and subsidiaries

- Controlled subsidiaries are always part of the chain of activities

### Downstream

- Distribution, transport and storage are only part if for or on behalf of the obliged company




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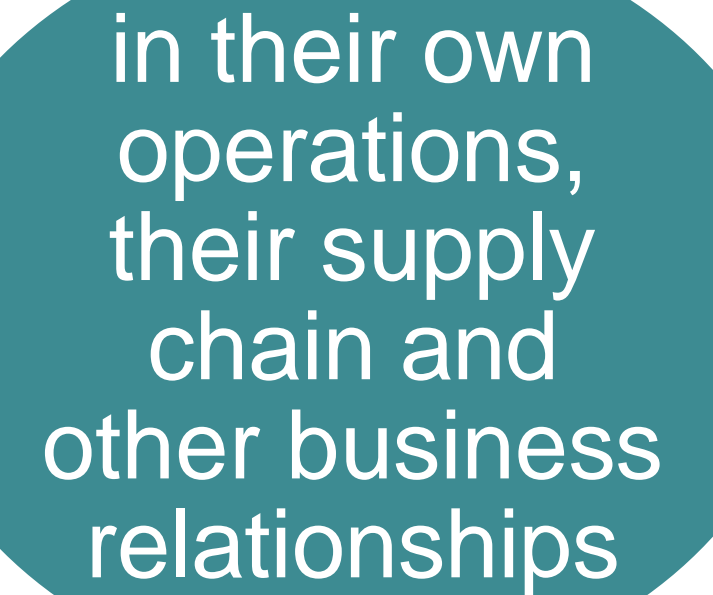

## WHAT IS DUE DILIGENCE?



Due diligence is the **process** enterprises should carry out



to identify, prevent, mitigate and account for how they address actual and potential **adverse impacts**



in their own operations, their supply chain and other business relationships

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## ASSESSMENT OF ACTUAL RISK

### Severity of Risk

#### SEVERITY



- **Scope**

How many people could be affected by the harm?

- **Scale**

How serious are the impacts for the victim?

- **Remediability**

Will a remedy restore the victim to the same or equivalent position before the harm?

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## ASSESSMENT OF ACTUAL RISK

### Severity of Risk in terms of “Scope”

How many people could be affected by the harm?

#### HIGH

- > 20% of the total population in the affected area or > 50% of the identifiable group

#### MEDIUM

- > 10% of the total population in the affected area or > 11-50% of the identifiable group

#### LOW

- > 5% of the total population in the affected area or < 10% of the identifiable group

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## ASSESSMENT OF ACTUAL RISK

### Severity of Risk in terms of “Scale”

How serious are the impacts for the victim?

#### HIGH

- The risk leads to death or adverse health effects, which can cause a considerable reduction in the quality of life and/or longevity of those affected.

#### MEDIUM

- The occurrence of the risk leads to a specific human rights violation of access to basic necessities of life (including education, livelihood, etc.).

#### LOW

- All other impacts that are not rated as high/medium.

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for Economic Cooperation  
and Development



## ASSESSMENT OF ACTUAL RISK

### Severity of Risk in terms of “Remediability”

Can the remedy return the victim to their pre-harm state?

#### HIGH

- Difficult to fix:
  - Complex technical requirements;
  - Low acceptance of remedial measures by the identified group;
  - Low capacity of the implementation partner
  - No viable substitute for losses caused by the effects

#### MEDIUM

- Simpler technical requirements;
- Acceptance by the identified group;
- Implementation partner can correct the effects with a little capacity development

#### LOW

- Easy to fix:
  - Simple technical requirements
  - Acceptance by the identified group
  - The implementation partner has the ability to fix

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## ASSESSMENT OF ACTUAL RISK

### Probability of Risk

How likely is it that the negative effect will occur?

#### OFTEN

- The risk has already occurred several times per year.

#### PROBABLY

- The risk has already occurred several times in the past.

#### OCCASIONALLY

- The risk generally occurs rarely in the industry, but can occur;
- The risk has occurred several times in the industry. However, it is rather unlikely to occur.

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# COMPLIANCE VS DUE DILIGENCE

What does **compliance** mean to you?

**Compliance** is about ensuring lists are ticked to gain compliance statements, often limited to Tier 1 suppliers.

What does **due diligence** mean to you?

**Due diligence** demands companies to identify and assess salient risks across their operations and value chain in an ongoing process aimed at continuous improvement.

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# COMPLIANCE VS DUE DILIGENCE

Which key topics characterize **compliance**?

Which key topics characterize **due diligence**?

## Compliance

Control-based approach

Closed-ended

Reactive risk-management

Forward-looking

## Due Diligence

Risk-based approach

Open-ended

Proactive risk-management

Backward-looking

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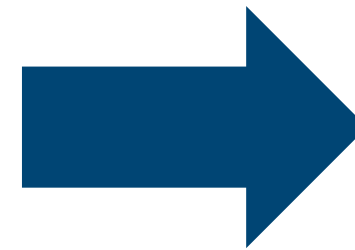


## DUE DILIGENCE: PARADIGM SHIFT

### Stake-holder focus



Risk to business



### Rights-holder focus



Risk to people & the environment

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## HUMAN RIGHTS RISKS: OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS IN THE GARMENT AND FOOTWEAR SECTOR



Child Labor



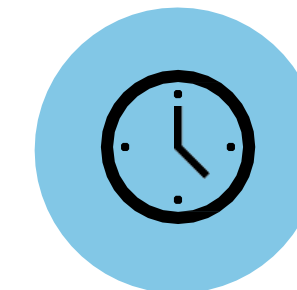
Occupational Health & Safety



Sexual harassment and sexual and gender-based violence in the workplace



Trade unions and collective bargaining



Working time



Forced Labor



Wages

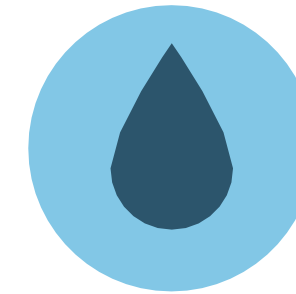
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## ENVIRONMENTAL RISKS: OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS IN THE GARMENT AND FOOTWEAR SECTOR



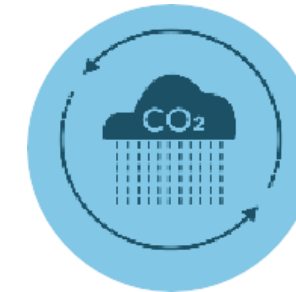
Hazardous Chemicals



Water Consumption and Pollution



Responsible Sourcing from Homeworkers



Greenhouse Gas Emissions

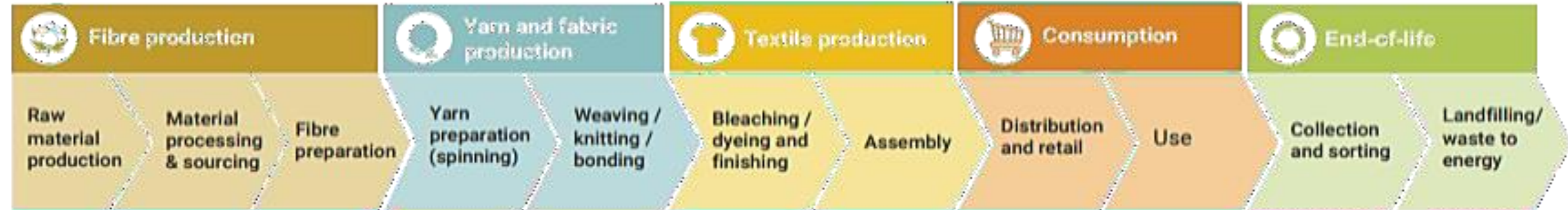


Bribery and Corruption

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# HUMAN RIGHTS HOTSPOTS:



<b>Human health</b>	Agrochemicals used in cotton cultivation; risk of injury and exposure to toxins and hazards		Risk of injury and exposure to hazards		High use of chemicals (risk of exposure to toxins and hazards); high use of coal-based energy	Risk of unsafe working conditions				
<b>Social risk</b>	Risk of child labour, forced labour, excessive working time, below minimum wage pay, gender inequality and conflict		Risk of child labour, forced labour, excessive working time, below minimum wage pay, gender inequality and conflict			Risk of child labour, forced labour, excessive working time, below minimum wage pay, gender inequality and conflict				
<b>Governance risks</b>	Risk of corruption and fragility in the legal system		Risk of corruption and fragility in the legal system			Risk of corruption and fragility in the legal system				

## Under - Reported Grievances: Harassment in the Workplace

5

These statistics show that sexual harassment is widespread in Pakistan, emphasizing the need for awareness, prevention, and effective reporting.

4

Another Gallup Pakistan survey indicated that 70% of urban women and 93% of rural women have experienced workplace sexual harassment.

6

Despite legislation empowering women to confront mistreatment, toxic professional settings persist, perpetuating a cycle of humiliation and victimisation

1

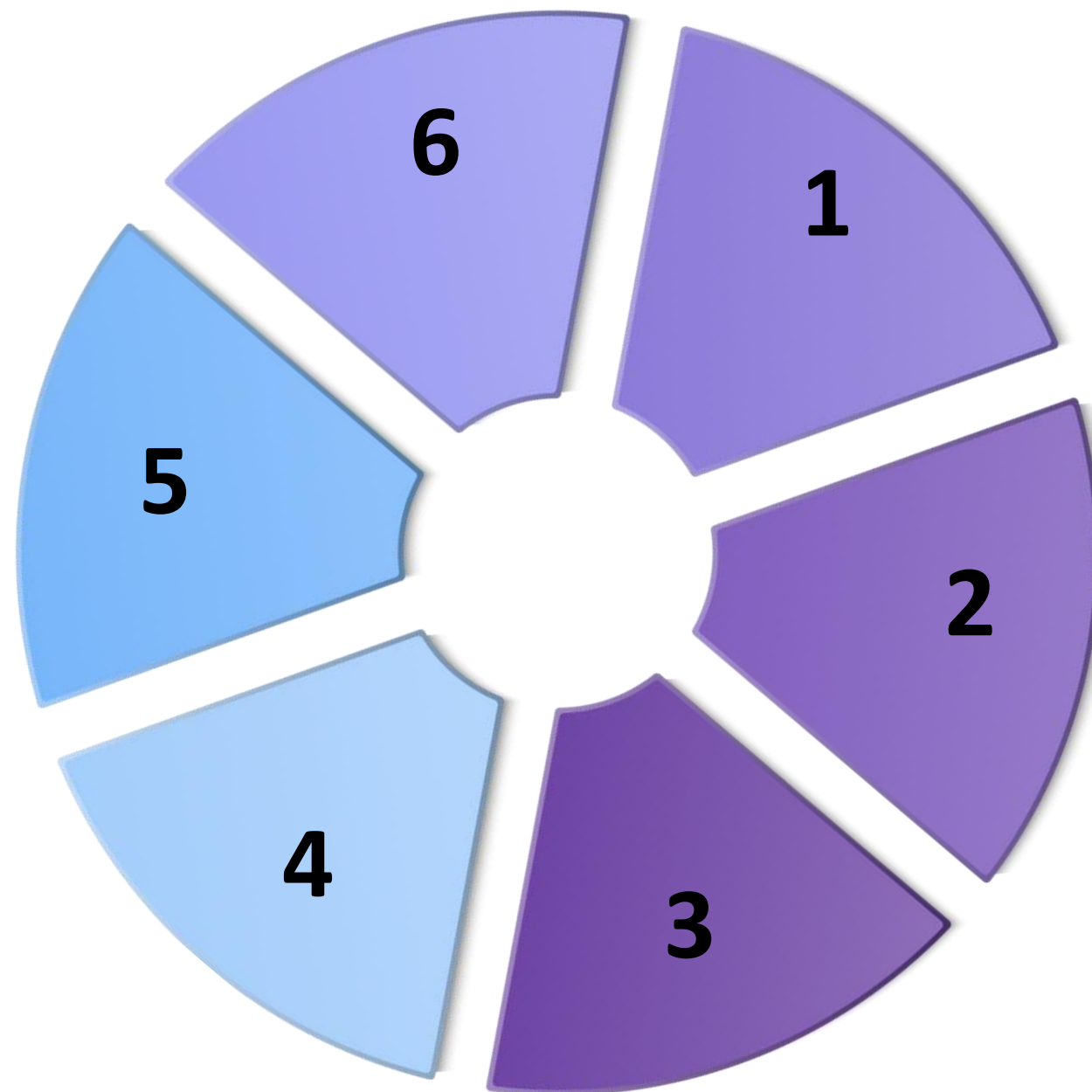
According to the Alliance against Sexual Harassment, a Pakistani non-profit, 93% of women in the private and public sectors report experiencing workplace harassment.

2

Pakistan's Federal Ombudsman Secretariat for Protection against Harassment at Workplace reported 2,169 harassment complaints in the government sector between 2018 and 2022. These complaints included 582 female and 148 male complaints.

3

The private sector saw 994 female and 445 male complaints. The Aurat Foundation, a Pakistani women's rights organization, found that 90% of working women in Pakistan have experienced workplace harassment. .



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# Under - Reported Grievances: Child Labour

The **1973 Constitution of Pakistan** includes several articles addressing human rights and labor, specifically prohibiting slavery, forced labor, and child labor while ensuring free and compulsory education.

**Article 11** prohibits slavery, forced labor, and trafficking, while also outlawing child labor.

**Article 25-A** mandates free and compulsory education for children aged 5 to 16.

**Article 37(e)** focuses on safe and humane working conditions, emphasizing that children and women should not be employed in jobs inappropriate for their age or gender.

***According to the International Labour Organization.***



## **Pakistan: Survey supported by UNICEF finds over 1.6 million children in Sindh engaged in child labour, with half exposed to hazardous work**

[Source: Business & Human Rights, July 2025](#)

Over 1.6 million children, between five and 17 years of age, in Sindh have been found to be trapped in child labour, revealed the Sindh Child Labour Survey 2022–2024.

.. the survey also revealed that over half (50.4pc) of child labour victims aged 10-17 worked in hazardous conditions, exposing them to excessive hours, extreme weather and unsafe tools. .. the project director of the survey,.. the incidence of child labour has seen a significant decline, reduced by nearly 50pc compared to the 1996 baseline.

Supported by the



## Under - Reported Grievances: Overtime & Minimum Wage Issues in Pakistan

- **Unpaid Overtime** → Workers asked to stay beyond shift without proper compensation.
- **Forced Overtime** → Pressure to accept long hours under threat of losing job.
- **Below Minimum Wage** → Wages paid are often less than the legal minimum set by the government.
- **Illegal Deductions** → Wages reduced for petty reasons (lateness, damaged goods).
- **Delayed Payments** → Monthly salaries not paid on time, affecting workers' survival.

- **38% of workers** in the textile sector report unpaid or forced overtime.
- **Around 25–30%** of factory workers are paid below the legal minimum wage.
- **70% of informal sector workers** do not have written contracts, making wage claims harder.

*(Sources: ILO, Human Rights Commission of Pakistan, PBS Labor Force Surveys)*

Women earn about **25% less per hour** than men—and around **30% less monthly**, even for equal work

*(Media Update: United Nations Pakistan, 11 March 2025, n.d.)*

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and Development



## 2011: Three-Dimensional Concept of **Protection**, **Respect** and **Remedy** (based on Ruggie Principles)



UN Guiding Principles on  
Business and Human Rights

State  
duty to  
protect

Corporate  
responsibility

Access  
to  
remedy -  
complaints  
mechanism

**Protect:** the state protects people within its borders from human rights violations with appropriate structures

**Respect:** Companies respect human rights and establish the necessary management structures to ensure

**Remedy:** Establishment of complaints mechanisms to avert human rights violations

State:  
Guiding Principles 1 - 10

Company:  
Guiding Principles 11- 24

State, Company, Employee's:  
Guiding Principles 25 - 31

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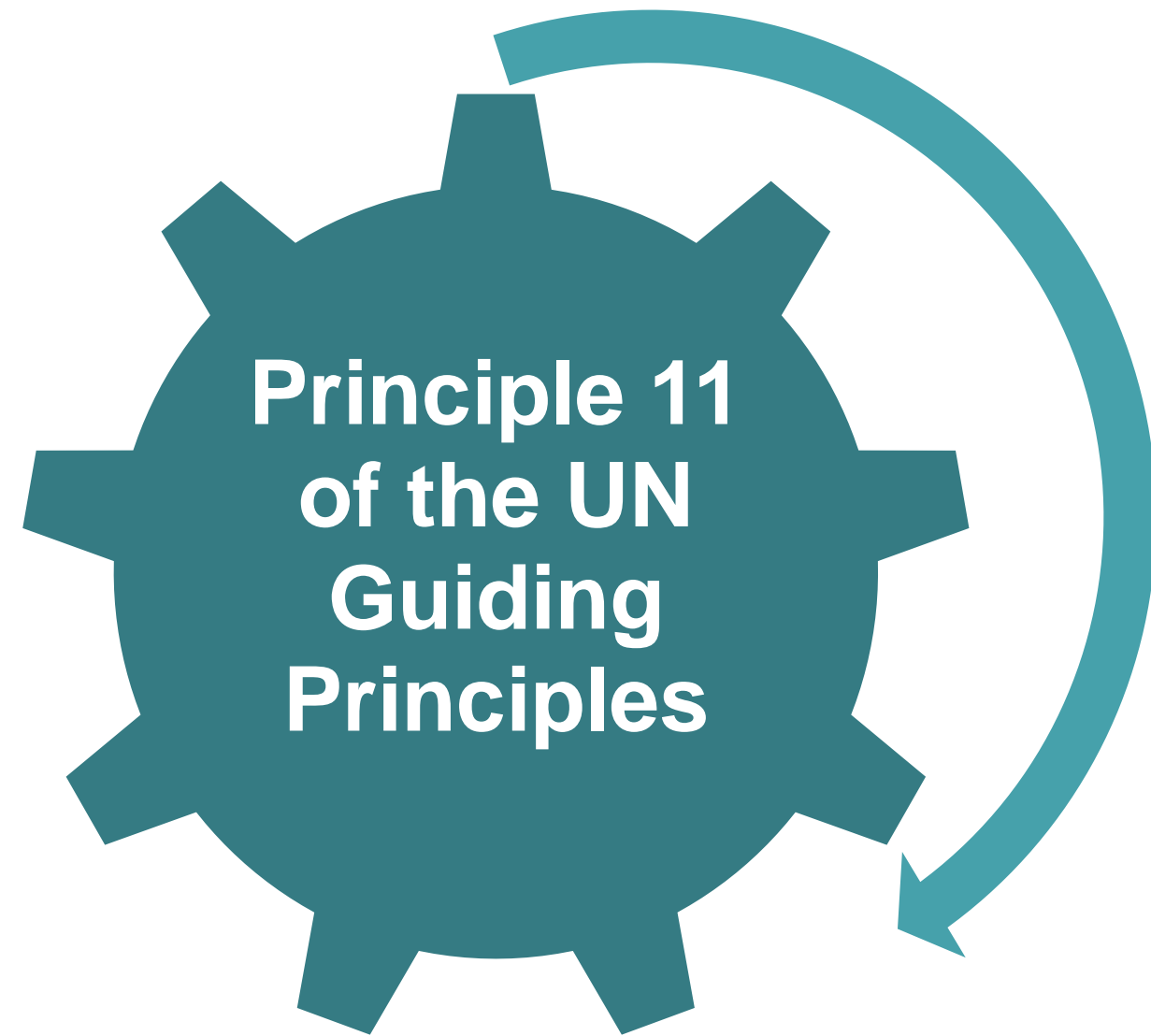


## United Nations Guiding Principle 31

“A **Grievance Mechanism** only serves its purpose if the people it is intended to serve **know about it, trust it and use it.**”

*Source: United Nations Human Rights, 2011*

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OECD (2022):

*“Carry out risk-based due diligence to identify, prevent and mitigate actual and potential adverse impacts, and account for how these impacts are addressed.”*

[Source: OECD \(2022\)](#)

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# The New Problems: For Factories, Brands and Workers

## Factories

- Audit Fatigue
- Multiple Brand based grievance management systems and Hotlines
- Possible manipulation, High Risk and Reputation Damage
- Brand proposed grievance systems are not compatible with workforce and Pakistan's culture.
- Ineffective IH and RH
- Internal grievance systems have less value
- Cost, Time and Energy

## Stake Holders

- Pressure for reducing liability w.r.t HRDD in supply chain.
- Lack of proactive approach and initiatives by suppliers on deployment of robust grievance systems.
- Adoption of global grievance systems not compatible with Labour and Culture in Pakistan.
- Existing systems, certifications, audits not enough for compliance with HRDD Laws.

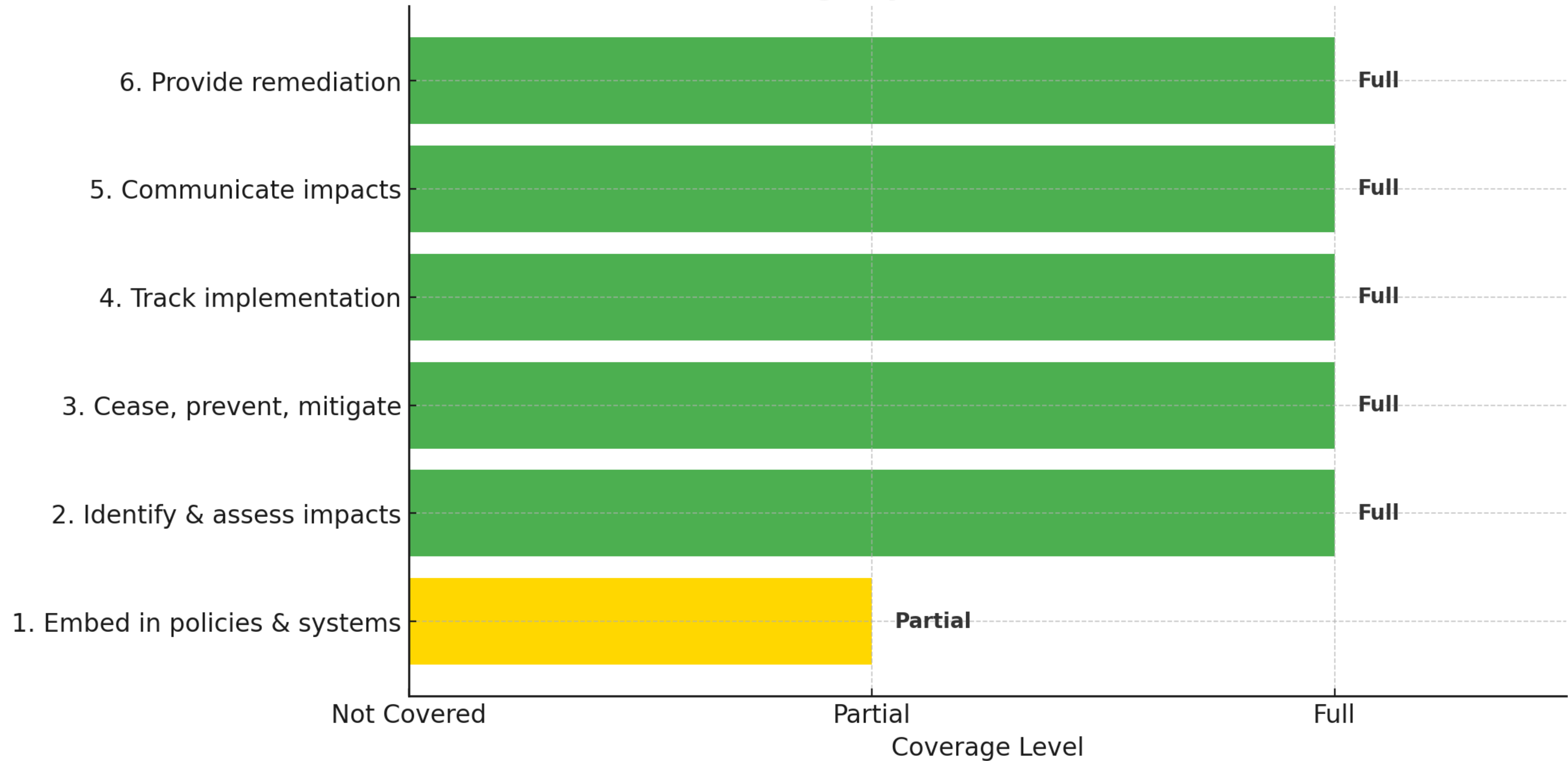
## Workers

- Growing Confusion
- Lack of Trust on regular grievance systems.
- Not User Friendly
- Psychological and Emotional Support and Counselling
- Ineffective IH and RH
- Fear of retaliation and job security.
- Grievance systems not designed for Women
- Lack of transparency
- Language and digital literacy barriers.

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## OECD 6 Steps on HR & Environmental Due Diligence Coverage by Grievance Mechanism










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# Grievance Mechanisms: Pakistan vs EU-CSDDD

## Pakistan (IRA 2012 + Provincial Laws)

-  Factory-level only – applies to registered employees
-  Worker must file grievance in writing to employer
-  Employer must reply in 10 days
-  Escalation: Conciliator → Labour Court → NIRC
-  Focus: Wages, dismissal, union rights
-  Closed system – no access for NGOs or external stakeholders
-  Remedies are legalistic, slow, adversarial

## EU-CSDDD (Due Diligence Directive)

-  Whole supply chain – direct & indirect suppliers
-  Requires effective grievance channels (Art. 9)
-  Must ensure timely & effective handling
-  Open access – workers, unions, NGOs, communities
-  Covers human rights & environment risks
-  Zero retaliation allowed; must prove accessibility
-  Penalties & market loss for non-compliance

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## *Worker's Story*

[https://drive.google.com/drive/folders/1hs6CHtdv9JLJS\\_bcslvGABFpohTtXeGP?usp=drive\\_link](https://drive.google.com/drive/folders/1hs6CHtdv9JLJS_bcslvGABFpohTtXeGP?usp=drive_link)



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## PRACTICAL ACTIONS

- Strive for full restoration and proportional remediation
- Follow the law and international guidelines for remediation
- Consult impacted rights holders on remedies
- Check complaint process satisfaction

## GRIEVANCE MECHANISM

- Hotline
- Email address
- Suggestion box
- Open door policy
- Employee surveys
- Stakeholder engagement
- Designated contact person
- grievance committee
- Sector / sustainability initiatives

***Or Third Party Digital  
Grievance  
Management  
Solutions***

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## Effective Grievance Mechanism: Key Features

Applicable to the needs of an organisation

Simple, defined and prompt

Trusted by the workers and the management staff

Suited to solve grievance within an organisation

Fact oriented

Understanding towards cultural differences

Managed by competent staff

(optional) supported through external services

Open and non-threatening

A sound channel of communication

Regularly reviewed and continuously improved

# Effective Grievance Mechanism: Key Requirements

Requirement	Indicator
Confidential and reliable	Independent system outside standard hierarchies, appeal mechanism
Must be known to all employees	Availability in all languages Solutions for illiterate workers available
Must be accessible to all employees	Through confidential handlers (oral complaints) or other suitable options
System must be suited to avoid retaliatory use	Through a defined system checking for plausibility of grievance
Regular review of systems applicability	Defined review process and assigned personnel
Transparency	Communication about ongoing processes and records about previous grievance
Defined steps, defined end	Available in writing, compliance with national and international requirements

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## FORMAL GRIEVANCE PROCESS

Recommendation for involved parties

Grievance  
council

Grievance  
managers

Grievance  
handlers

Mediators  
and other  
third parties



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## INVOLVED PARTIES

### Mandatory

#### Grievance council or grievance manager

- Guide through the grievance process step-by-step
- Manage and monitor the compliance of the process
- Inform management about grievances if necessary
- Coordinate the process and ensure its integrity
- Coordinate the measures with the relevant parties
- Coordinate the reporting and compliance with the grievance management certification
- Carry responsibility to meet grievance system requirements

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## INVOLVED PARTIES

### Mandatory

#### Grievance council

- Composition of council to ensure independence from workers and management

#### Grievance handlers

- If the size of the organisation requires assistance for the grievance managers, handlers may be appointed or chosen by the workers
- They address and handle grievances according to a defined and written process

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## INVOLVED PARTIES

### Optional

#### Third party

- May be involved if necessary – either in the beginning of the process or when to monitor parts of the process/reporting
- Parties involved in grievance may submit a proposal to third party
- May be called upon in case grievance cannot be handled internally
- May be called upon if independency of the system must be assured

#### Mediator/Arbitrator

- May be called upon in case grievance system cannot be handled
- Both parties can submit a proposal for a mediator or an arbitrator
- Has the right to make decisions

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## GRIEVANCE COMMITTEE

HR Manager	Recruit new staff; document, employee files
Social Compliance Officer	Set and check code procedures, knowledge in labour laws and related regulations
Production Manager	Conduct production forecast, plan production, communicate production requirements
QC Manager	Set and check quality standards and offer trainings
OSH Manager	Set and check OHS standards and offer trainings
Worker's Representative	Communicate worker concerns and ideas
3 senior workers	From different sections, independent from workers' representations

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## TANGIBLE ISSUES

### **Salary Delays**

Late payments due to payroll errors.

### **Safety Hazards**

Broken PPE gear or malfunctioning equipment.

### **Poor Facilities:**

No clean drinking water or overcrowded restrooms.

### **Unfair Shifts**

Last-minute overtime without compensation.

**they demand immediate fixes.**

**Real Issues: Left unsolved** → morale, performance, and turnover

## PERCEIVED GRIEVANCES

### **HR Favors Team A!**

Unclear promotion criteria.

### **Why was my leave denied?**

Poorly explained policies

### **They're cutting bonuses!**

Rumors due to lack of transparency

### **My supervisor ignores me**

Language/cultural misunderstanding

**they demand proactive communication.**

**Perceived Issues: Left unaddressed** → Toxicity, disengagement, gossip cycles.

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## Activity

### Anonymous Question Box

- Setup: Provide a box for participants to drop anonymous “concerns” or “grievances.”
- Activity: Read some aloud and walk through how they would be handled under the mechanism.
- Goal: Shows transparency and fairness in addressing real issues.

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# Features of a Grievance Reporting Channel

**When an employee shares a grievance, they are not just reporting a problem—they are seeking feel heard, safety and respect.**

## **Accessibility**

Available to all relevant personnel,  
regardless of location or role.

*C122 – Employment Policy Convention*

## **Security and Confidentiality**

Protects the identity of reporters if  
anonymity is required.

*C155 – Occupational Safety and Health Convention*

## **Protection Against Retaliation**

Explicitly enforce a zero-tolerance for  
any form of retaliation.

*C98 – Collective Bargaining*

## **Trust and Transparency**

Clear procedure, timeframes, and process  
stages should be established and shared.

*C81 – Labour Inspection Convention*

**Understanding that not every complaint can be an anonymous complaint**

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# Enhancing Grievance Management through Worker Voice & Social Dialogue

---

**Independent grievance systems:** Hotlines, digital tools, or NGO-facilitated channels.

---

**Worker awareness training:** Rights, complaint procedures, and support access.

---

**Confidentiality & non-retaliation:** Assurances to protect workers when raising concerns.

---

**Representative worker committees:** Worker-led, not management-controlled.

---

**Regular external audits:** Off-site interviews and third-party verification.

---

**One-on-one surveys:** Confidential worker feedback to capture real concerns.

---

**Structured social dialogue:** Ongoing, trust-based engagement between workers and management.

---



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# First Step Toward Resolving a Complaint — Listening

## How You Listen Determines Whether the Grievance Grows or Gets Resolved

### The 3-Part Pause

Pause before responding

Paraphrase: "So what I hear is..."

Probe: "Can you share more about...?"

### Emotional Labeling

"I sense you're frustrated about..."

Validates feelings without judgment

### The 80/20 Rule

Employee speaks 80% of time

You speak 20% (mostly questions)

### Non-Verbal Signals

Maintain eye contact (culturally appropriate)

Nodding, leaning slightly forward

Avoid distractions (phone/paper shuffling)

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# Active Listening

A communication technique where the listener pays full attention to the speaker, both verbally and nonverbally, to understand the complete message being conveyed.

## Role of Active Listening in Grievance Management Systems

- Understanding **complainants perspective**
- Clarifying **facts & accurate information**
- Reducing **tension**
- Rapport building**



## Benefits of Active Listening in Grievance Management Systems

- Early **conflict resolution**
- Better **decision-making**
- Credibility** of process is increased
- Enhances **emotional support**
- Increased **employee confidence**

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# Non-Verbal Communication

## Gestural Communication



- Shows attentiveness
- Reinforces messages
- Encourages openness
- Manages tension

## Emotional Expressions (Tone, Pitch, Pace of Voice)



- Sets emotional tone
- Humanizes the process
- Helps de-escalate
- Builds connection

## Eye Contact



- Builds trust
- Adds acknowledgement
- Signals focus
- Manages conversation flow

## Facial Expression



- Reflects sincerity
- Effective social interaction
- Influences reactions
- Conveys empathy

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## Emotional Intelligence in Women- Role in Grievance Management Systems

- **High Empathy** → Helps complaints feel heard, understood, & respected.
- **Active Listening Skills** → Encourages fuller disclosure of sensitive issues.
- **Non-Verbal Sensitivity** → Better at reading emotional cues, body language, and hidden distress.
- **Conflict de-escalation** → Calmer, compassionate responses reducing tensions during hearings.
- **Trust Building** → Women with high *Emotional Intelligence* can create safer environments for reporting grievances.

### Emotional Responsiveness in Men for Grievance Systems

- **Role-Model Behavior** → Upholding dignity and accountability in the workplace.
- **Balanced Approach** → Firmness with empathy prevents intimidation and ensures fairness.



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## Dos and Don'ts

اصول	درست ردعمل (✓)	غلط ردعمل (✗)
<b>3-Part Pause</b>	"آپ کا مطلب ہے...؟" + "کیا آپ مزید بتا سکتے ہیں؟"	"نہیں، ایسا نہیں ہو سکتا"
<b>80/20 Rule</b>	"میں سن رہا ہوں، آپ بتائیں مکمل بات"	"آپ نے ہی کچھ غلط کیا ہوگا"
<b>Emotional Labeling</b>	"مجھے لگتا ہے آپ کو مایوسی ہوئی"	"آپ حساس ہو رہے ہیں"

## Dos and Don'ts

تکنیک (ٹائٹل)	مثال (ملازم)	درست ردعمل	غلط ردعمل
Emotional Labeling	دیکھیں سر، میں نے اپو دو مرتبہ قولیتے کے مسئلے کی رپورٹ کی ہے، مگر کوئی کڑھوی نہیں بنی۔ ایسے لگتا ہے جسے میری بات کی یہاں کوئی اہمیت نہیں ہے اور مجھے نظر انداز کیا جا رہا ہے	مجھے لگتا ہے کہ آپ کو اس بات پر نظر انداز کیے جانے اور مایوسی کا احساس ہو رہا ہے کہ آپ کی بتائی گئی باتوں پر عمل نہیں کیا گیا۔ یہ احساس واقعی بہت تکلیف دہ ہو سکتا ہے۔	دیکھیے! آپ اتنے حساس نہ بنیے، فیکٹری میں ہزاروں کام ہوتے ہیں، ہر شکایت فوراً نہیں سنی جا سکتی۔ آپ کو صبر کرنا چاہیے۔
Paraphrase and Probe	سر! یہ کیا ہو رہا ہے؟ ہر دفع مشین صاف کرنا کا سب سے مہسکل اور گندا کام مجھے ہی دیا جاتا ہے۔ دوسرے بندے آرام سے بیٹھ کر دیکھتے رہتے ہیں۔ مجھے لاگ رہا ہے جسے مجھے پھسا دیا ہے	مجھے آپ کی بات کی سمجھ آرہی ہے، آپ کا مطلب ہے کہ آپ کو ایسا محسوس ہوتا ہے کہ مشکل اور غیر دل چسب کام صرف آپ کو ہی دیا جاتا ہے جب کہ دوسرے ساتھیوں کو نہیں؟ کیا آپ مجھے تفصیل سے بتا سکتا ہیں کہ یہ کب سے ہو رہا ہے اور کیا اس میں کسی خاص شفٹ یا سپروائزر شامل ہے؟	نہیں ایسی کوئی بات نہیں ہے، کام تو سب میں تکسیم ہوتا ہے۔ آپ خمکھا زیادہ سوچ رہے ہیں، یہ اپکا وہم ہے
80/20 Rule	پچھلے مہینے کا و اضافی کام اور ٹائم کیا تھا، اسس کی تنخوا ابھی تک نہیں سے کوئی جواب ہی نہیں آ رہا۔ مرے گھر کا بجٹ خراب ہو گیا ہے۔ کو دوبارہ رابطہ کیا مگر کوئی جواب HR میں نہیں ملا	سر مجھے پوری طرح سمجھ آ رہا ہے کہ آپ کتنا پرسشن ہونگے۔ جب کی ہی محنت کا صلا نہ ملو تو مایوسی ہوتی ہے۔ کیا آپ مجھے اس معاملے کی مکمل تفصیل دے سکتے ہیں جسے کیا ہوا، تاریخ، اور کس سے بات ہی؟ میں یہاں آپ کی بات سننے کے لئے موجود ہوں	دیکھتا ہے۔ ممکن ہے کہ آپ نے HR وورٹھمے کہ معاملات تو غلط یا نامکمل کاغذات دے ہوں

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## Step 2: The 50-50 Rule of Grievance Handling

The aggrieved person tells you their side. Your responsibility is to uncover the rest

**Example: An operator complains about "unfair workload."**

### Investigate the Context

Missing 50%: Check production logs, ask teammates about shift patterns.

### Cross-Check with Data

Attendance records, CCTV footage, work logs

### The Hidden Systemic Factor

Is this a one-time issue or a process flaw?

Red Flag: If similar grievances recur in the same department.

### Ask Clarifying Questions

Use open-ended questions: "Can you walk me through what happened?"

Validate statements with factual cross-checks

### Red Flags to Avoid

- **Jumping to conclusions without evidence**
- **collecting info. in a visibly biased manner**
- **Discussing the case openly or emotionally**
- **Ignoring cultural sensitivity or emotional impact**

**Empathy + Evidence = Effective Grievance Handling.**

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## Step 3: Grievance Recording and Documentation

**If it's not recorded, it didn't happen.**

### **Serial No/Ticket Number for tracking**

Auto-generated or manually assigned

Enables easy tracking and follow-up

### **Date & Time Stamp**

Captures when the grievance was received

Helps determine response timelines and urgency

### **Complainant Details**

Name, department, shift (or anonymous if the system allows)

Respect for anonymity must be preserved when requested

### **Nature of Complaint**

Brief but specific summary (e.g., salary delay, verbal abuse, broken fan)

Add evidence where available

### **Mode of Submission**

Written form, mobile app, suggestion box, helpline, verbal to supervisor (recorded by HR)

### **Initial Response / Acknowledgment Status**

Whether it was acknowledged, in process, or escalated

**Poorly documented complaints are a liability**

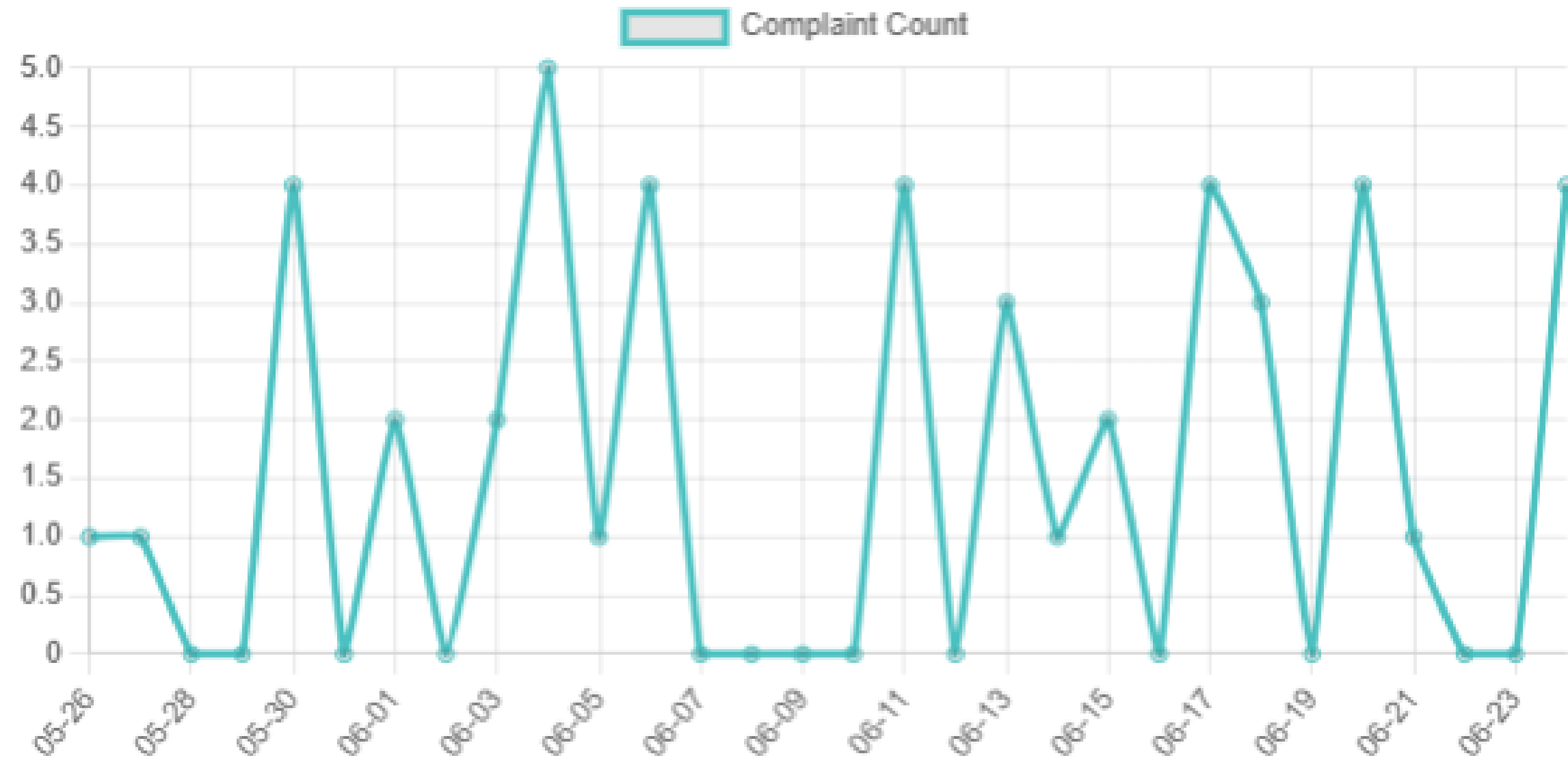
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# Accessibility

A continuous pattern of complaints reflects that the system is effective and accessible for wide audience.

### Complaints by Days



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## Trust and Transparency

46

Total Complaints



0

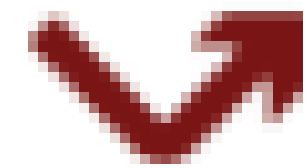
Anonymous Complaints

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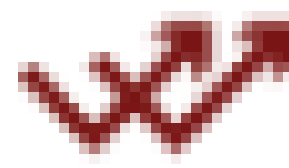
# Protection Against Retaliation

## Complaints Status



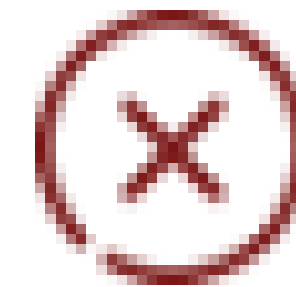
Bounced1.0

2.2%



Bounced2.0

0.0%



Unclosed

0.0%

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# Resolving — Corrective & Preventive Action

Resolution isn't just about putting a bandage on the issue—it's about restoring trust, reinforcing fairness, and ensuring it doesn't happen again.

## Corrective Action – Fixing the Immediate Issue

This means addressing the specific problem the employee faced.

Examples:

- Reversing an incorrect salary deduction
- Replacing a broken water cooler
- Apologizing and warning a supervisor for misconduct
- Adjusting duty rosters or work assignments

## Preventive Action – Strengthening the System

Once the issue is resolved, ask:

“What allowed this to happen in the first place?”

Examples:

- Add a check in payroll software to prevent repeat deductions
- Improve internal communication on leave policies
- Retrain line managers on respectful behavior
- Put up signage or FAQs to clarify procedures

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# Harassment Committees In Grievance Management Systems

Vitally important in preventing workplace harassment. These committees are responsible for establishing a safe and respectful work environment by **implementing policies**, **investigating complaints**, and **recommending appropriate actions**.

**Workplace Harassment Law**  
“Protection against harassment of women at the workplace act, 2010”

## Specialized Grievance channels For Harassment

Ensuring

- Confidentiality
- Impartiality
- Protection

## Gender Inclusive

- Female representation  
→ builds trust  
→ encourages reporting
- Male representation  
→ strengthens accountability  
→ maintains gender balance

## Building Trust & Culture

- Reduces barriers, & fear of retaliation.
- Ensuring no other problem occurs again
- Positioning systems as preventive measures  
→ awareness sessions, trainings, & sensitization



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# Q & A Session