

Grievance Mechanism Tools

Intake, case tracking and a self-assessment against the eight UNGP 31 effectiveness criteria: the compliance layer of a mechanism, ready to run.

From *Navigating Human Rights Due Diligence: A Compliance-to-Engagement Implementation Guide* · Thomas Gaultier · thomasgaultier.com/resources/hrdd

Article 14 of the CSDDD survived the Omnibus untouched, which makes the notification mechanism and complaints procedure one of the few obligations whose shape is now settled. The LkSG requires its own complaints procedure, and the French vigilance plan requires an alert mechanism established after genuine prior concertation with representative trade unions, a point on which La Poste lost.

These three instruments cover the part a regulator or a lender will ask to see: how a case enters, how it is tracked, and how you know whether the mechanism works. Designing the mechanism itself, the architecture choices, the mediation pathway and the business case for resourcing it, is the subject of a separate volume.

— Intake form fields

The minimum field set. Anonymous and represented submissions must both be possible, or the mechanism will only ever hear from the people who are least at risk.

Field	Description	Notes
Case Reference Number	Unique identifier assigned upon receipt	Auto-generated; shared with complainant
Date Received	Date and time of complaint submission	Recorded by intake officer
Channel of Submission	Hotline, email, web form, in-person, intermediary	Record for monitoring channel usage
Complainant Identity	Name, contact details (if provided)	Anonymous submissions permitted
Relationship to Company	Employee, supply chain worker, community member, other	Determines routing
Location / Facility	Site, supplier, or geography where issue arises	As specific as possible
Description of Complaint	Narrative account of the issue or concern	Use complainant's own words

Category of Issue	Forced labor, health and safety, wages, discrimination, environment, other	Classified by intake officer
Desired Outcome	What resolution does the complainant seek?	Optional but recommended
Confidentiality Preference	Complainant's wishes regarding identity disclosure	Document consent explicitly
Acknowledgment Provided	Date and method of acknowledgment to complainant	Within 5 working days

— Case tracking

Case Ref.	Status	Category	Date Received / Target	Assigned To	Actions Taken / Outcome
[GR-2026-001]	[New / Under Review / Investigation / Mediation / Resolved / Closed]	[e.g., Wages]	[Received: Date] [Target: Date]	[Name/role]	[Summary of investigation steps, findings, and resolution or remediation provided]
[GR-2026-002]	[Status]	[Category]	[Dates]	[Assigned]	[Actions/Outcome]

— Effectiveness self-assessment against UNGP 31

Rate each criterion Strong, Adequate, Developing or Weak, and require evidence for every rating above Developing. A mechanism that scores well on every criterion except "legitimate" is a mechanism nobody trusts, and the case volume will tell you so.

UNGP 31 Criterion	Assessment Question	Rating	Evidence	Priority Improvements
Legitimate	Is the mechanism trusted by its intended users? Is governance independent?	[S / A / D / W]	[Cite]	[Identified actions]
Accessible	Can all rightsholders access the mechanism without barriers (language, cost, literacy)?	[S / A / D / W]	[Cite]	[Identified actions]
Predictable	Are procedures and timeframes clear, published, and consistently followed?	[S / A / D / W]	[Cite]	[Identified actions]
Equitable	Do complainants have fair access to information and support?	[S / A / D / W]	[Cite]	[Identified actions]

Transparent	Are parties kept informed of progress? Are anonymized trends reported publicly?	[S / A / D / W]	[Cite]	[Identified actions]
Rights-Compatible	Are outcomes consistent with international human rights standards?	[S / A / D / W]	[Cite]	[Identified actions]
Source of Learning	Are patterns analyzed and used to improve policies and prevent recurrence?	[S / A / D / W]	[Cite]	[Identified actions]
Dialogue-Based	Does the mechanism prioritize mutually agreed solutions over adversarial outcomes?	[S / A / D / W]	[Cite]	[Identified actions]

WHERE TO GO DEEPER

Building the mechanism, not just documenting it

These sheets cover the compliance layer. The design of a mechanism communities actually use, the six-step process from intake to verified close-out, the mediation-first pathway and the costed business case are the subject of *Grievance Mechanisms That Work*.

A mechanism nobody uses is a mechanism that is failing quietly.

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