Meaningful Stakeholder Engagement: Practical Guidance for Companies in the Agriculture and Food Manufacturing Sector

A roadmap for putting workers and communities at the centre of your human rights and environmental due diligence

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Useful definitions

Rightsholders (affected stakeholders): Individuals or groups whose human rights are (at risk of) being impacted by a company's actions and decisions. Their engagement is crucial for successful outcomes. They are diverse groups, differing in terms of gender, ethnicity, (dis)ability, age and migrant status. Rightsholders often hold less power and fewer resources than companies and other stakeholders. The terms "affected stakeholders" and "rightsholders" are used interchangeably throughout the guidance.

Credible proxy: Someone outside a stakeholder group who understands and can represent their needs and interests, such as civil society organisations. Credible proxies should only represent stakeholders when this role is requested or authorised by the stakeholders in question.[1]

Gender-transformative: Recognises that human rights and environmental impacts are not gender-neutral and integrates gender as a cross-cutting consideration throughout stakeholder engagement. It is underpinned by the right to gender equality and goes beyond addressing the symptoms of gender inequality by explicitly seeking to identify and address its root causes – such as discriminatory social norms and unequal power relations – with the aim of supporting long-term, systemic change.

Human Rights and Environmental Due Diligence (HREDD): The process by which businesses identify, prevent, mitigate, and account for their adverse impacts on human rights and the environment. This process includes engaging meaningfully with stakeholders.[2]

Gender-based violence and harassment (GBVH): Violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately. This includes sexual harassment.[5]

Inclusive engagement: A process to ensure that all perspectives, regardless of background, identity, or abilities, are considered. It includes actively seeking out the voices of disadvantaged and marginalised individuals and groups who are at risk of being overlooked, even unintentionally, in engagement processes. This is vital, as these individuals or groups often experience the highest risk of adverse impacts. This is vital, as these individuals or groups often experience the highest risk of adverse impacts.

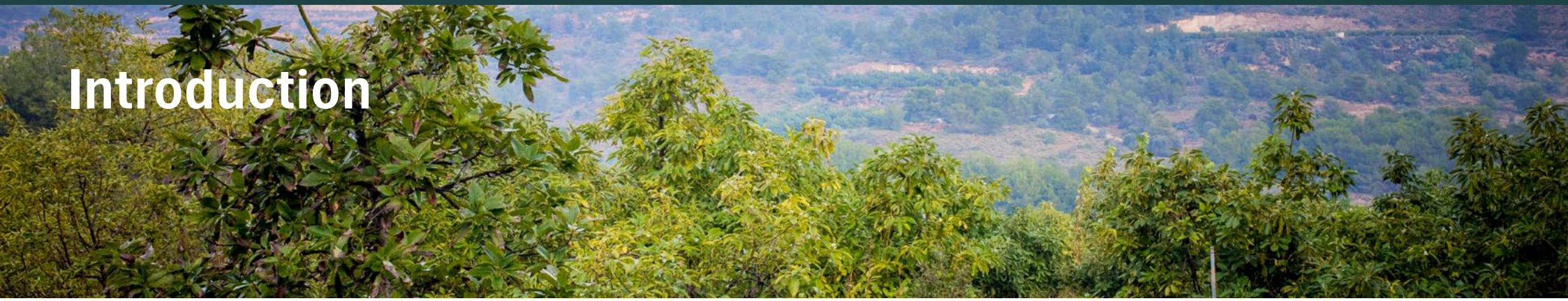
Knowledge institution: Organisations dedicated to collecting and sharing accurate, reliable data, including universities and independent non-governmental organisations.[3]

Legitimate representative: Individuals or organisations selected or elected by rightsholders to represent their interests, with a clear mandate to speak and negotiate on their behalf. In the context of labour rights, democratically elected trade unions serve as the legitimate representatives of workers.[4]

Power imbalances: The unequal distribution of influence, authority, or resources between different stakeholders. Power imbalances are prevalent throughout agrifood supply chains, between companies, workers, and communities. These imbalances can significantly affect the ability of certain groups to meaningfully engage, express their views, or advocate for their interests.

Safeguarding: Measures to protect people, particularly those at risk, from abuse or harm.

Stakeholder: Any individual or organisation that may affect, or be affected by a company's actions and decisions. In line with the UN Guiding Principles, and throughout this guidance, the primary focus is on those whose human rights have been or may be affected by a company's operations, products, or services.



Introduction

This practical guidance supports companies in the agriculture and food manufacturing sector in carrying out meaningful stakeholder engagement, with a particular focus on workers and communities.

Meaningful Stakeholder Engagement (MSE) is the process of engaging stakeholders in a genuine, safe, respectful, and ongoing dialogue to ensure their perspectives meaningfully shape company decisions and improve human rights and environmental outcomes.[6]

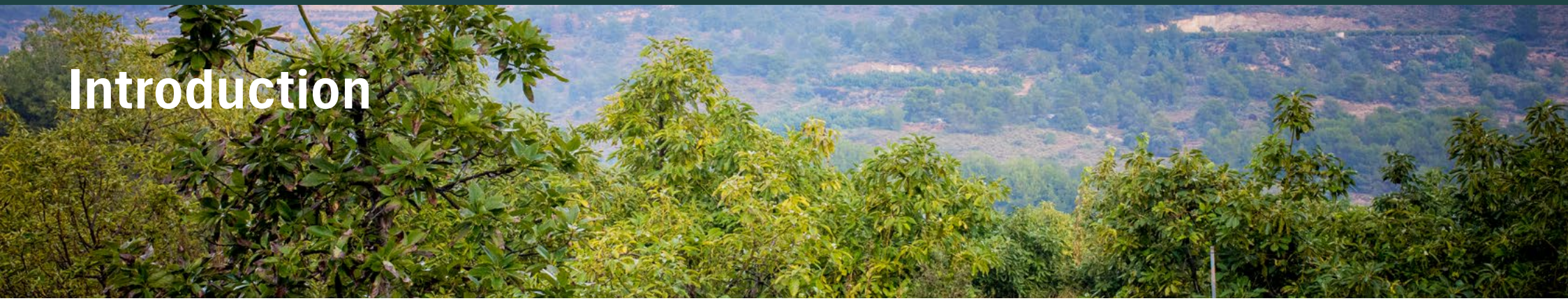
In line with the UN Guiding Principles on Business and Human Rights **(UNGPs),** which are increasingly being embedded in mandatory hard law the primary focus of MSE should be on rightsholders (also called 'affected stakeholders') – such as workers, communities, and others who may experience impacts. Their perspectives, concerns, and knowledge are essential for identifying risks, shaping effective responses, and ensuring that companies genuinely respect human rights and the environment.

Why this guidance?

Supply chains in the agriculture and food sectors are closely linked to significant environmental and social challenges, including biodiversity impacts, labour rights, and community livelihoods. Effective engagement with stakeholders across these varied contexts is critical to understanding risks, identifying opportunities for improvement, and ensuring that interventions are practical, inclusive, and impactful. This guidance was developed to provide actionable, sector-specific recommendations on MSE.

How was this guidance developed?

This guidance was created through a consultative process that reflects the principles of stakeholder engagement it promotes, including dialogue with companies, civil society organisations, trade unions, and rightsholders. Anonymous quotes from these stakeholders are included throughout the guidance.



Introduction

Who is this guidance for?

The guidance has been developed to support companies and their staff members in the agriculture and food manufacturing sectors who have a role in engaging stakeholders – including sustainability, procurement, human resource managers, and local country teams

This guidance recognises that companies may be at different tiers of agri-food supply chains and at different maturity levels. It is meant to serve as a practical resource for companies – whether just beginning to develop stakeholder engagement processes or looking to strengthen and deepen existing approaches.

How to use the guidance

The guidance has been designed so that readers can consult the sections most relevant to them.. It does not have to be read cover to cover. The annexes are provided in separate documents, allowing readers to open both files in their browser and easily navigate to the sections most relevant to them.

The guidance does not offer a one-size-fits-all approach. Any meaningful engagement must be tailored to the specific stakeholders, country, and context. Meaningful engagement with rightsholders does not replace universally established norms of social dialogue including consultation and collective bargaining with workers and their unions.

Structure

1 Understanding meaningful stakeholder engagement in the agriculture and food manufacturing sectors

Provides an overview of what meaningful engagement is and why it matters in these sectors.

Read this section if you want a deeper understanding of the topic, what good practice looks like, how companies can tailor their approach to sector-specific conditions, the associated benefits and relevant soft and hard law frameworks.

2 Step-by-step guidance

Takes the reader through the who, the how, and the when of engagement

Use this section when planning new engagement activities or seeking to strengthen existing practices.

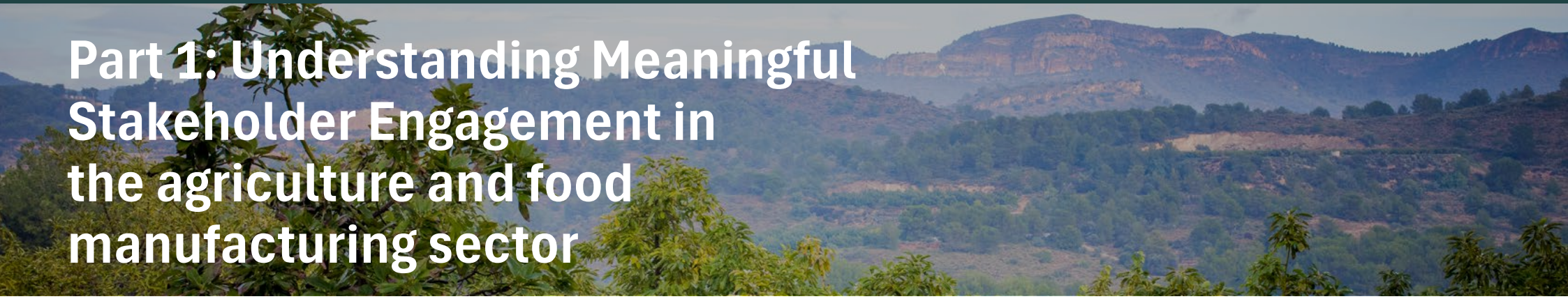
3 Annexes

Provides tools and additional information (available in separate documents)

Refer to this section for practical tools – such as stakeholder mapping, data collection, and management system resources – as well as detailed knowledge materials cited throughout the guidance. Throughout, the guidance includes case studies of meaningful engagement with stakeholders and rightsholders to inspire action.

Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

Women farmers during the basil harvest. Photo: Bryson Sayuni/Oxfam



Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

Meaningful Stakeholder Engagement is the ongoing, two-way, good-faith process through which companies proactively identify, consult, and collaborate with stakeholders and those who may be affected by their operations, products, or business relationships.[7]
In line with the UNGPs[8] and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (2023)[9], meaningful engagement should be:

01

Ongoing and iterative: Engage continuously and whenever operations, relationships, or contexts change.

02

Focused on risks to people: Prioritise understanding risks to affected stakeholders, especially those in vulnerable or marginalised positions. It is important to engage potentially affected stakeholders and rightsholders before making any decisions that may impact them.

03

Risk-based: Tailor engagement intensity and methods to the severity and likelihood of potential human-rights impacts.

04

Context-sensitive: Tailor engagement to local social and cultural contexts.

05

Actionable[10]: Use stakeholder insights to inform decisions, policies, and operational practices.

06

Transparent: Communicate engagement outcomes openly and track effectiveness, including responses to feedback and remediation where needed.

Meaningful engagement should also align with certain principles (see "What good looks like"). Engagement can and should occur throughout **all stages of human rights and environmental due diligence** – including identifying social and environmental impacts, developing prevention and mitigation measures, tracking effectiveness, and designing or supporting remediation (see When section).

Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

Why is meaningful stakeholder engagement important in the agriculture & food manufacturing sector?

The food and agriculture sector remains the world's largest labour sector, employing nearly 1.3 billion people worldwide.[13] At the same time, its dependence on natural resources, vulnerability to climate impacts, and reliance on fragmented, labour-intensive supply chains make it both highly complex and high-risk:

1. Human-intensive supply chains in high-risk environments

Global agrifood supply chains are often long, fragmented, and lack transparency. They frequently span multiple tiers – from inputs and primary production to farms, aggregation points, processors, and retailers (see value chain figure on page 12). In many sourcing regions, gaps in labour enforcement, high levels of informal or seasonal work, limited grievance mechanisms, and restricted civic space further compound this complexity.

These factors increase the likelihood of hidden or underreported impacts that cannot be reliably identified through social compliance audits or desk-based assessments alone (see Q&A: What role do social audits play in meaningful rightsholder engagement?)

Who are stakeholders and rightsholders?

Stakeholders are individuals or groups who have an interest in, can affect, or are affected by a company's decisions and actions – positively or negatively.[11] In the agriculture and food manufacturing sector stakeholders typically include actors that companies commonly engage with, such as suppliers, trade unions, NGO's, government officials and investors.

Rightsholders are a specific subset of stake-holders: individuals or groups whose human rights may be affected by a company's activities, decisions, or business relationships – and whose rights the companies have a responsibility to respect. Rightsholders in the agriculture and food manufacturing sector are typically workers (including migrant, temporary, seasonal and informal workers), growers and community groups (smallholder farmers, fishers and communities).

Different rightsholders may experience different or disproportionate negative impacts, especially people who face multiple forms of discrimination based on their identities.

Rightsholders may have formal representation – such as trade unions or community or indigenous leaders – or they may lack any structured or safe channels to voice concerns. Because workers are a key rightsholder group, it is important to recognise that labour rights are core human rights, exercised through structures like trade unions and collective bargaining. Meaningful engagement helps surface real impacts, but must never replace, bypass, or undermine social dialogue, worker representation, or ILO-defined collective rights.[12]

See part 2 for step-by-step guidance on how companies can assess who to engage.

Suggested actions for companies:

- Move beyond due diligence based on traditional audits alone – direct engagement often reveals hidden issues.
- Move towards building long-term relationships with suppliers and other local stake-holders to reach people who are otherwise invisible in traditional monitoring systems.

A coffee producer at the Guaya'b cooperative in Guatemala. Photo: Carlos Zaparolli / Oxfam

2. Large groups of rightsholders facing elevated risks

People across agrifood supply chains often face risks that remain hidden or underestimated. Many groups have less power in workplaces and communities which means their concerns are easily missed unless companies take deliberate steps to hear them. For example:

- **Women**, – who make up a major share of the agrifood workforce –, are more likely to have irregular, informal, low-paid, part-time, and physically demanding roles[14] Women earning agricultural wages receive only 82 cents for every dollar earned by men on average, and they also carry most unpaid household and care responsibilities[15]- further reducing their influence over workplace and community decisions.
- **Children of smallholder farmers** often support their families with unpaid care and domestic work which is invisible and unrecognised, potentially limiting their access to schooling, rest, and play, and increasing risks of hazardous work during peak agricultural seasons.
- **Migrant workers** who experience greater exposure to workplace heat stress compared to native workers, as they are more likely to perform physically demanding tasks, work outdoors for longer periods, take fewer unplanned breaks, and work at higher intensities.[16]
- Rightsholders in agrifood supply chains also often face overlapping forms of vulnerabilities based on **gender, age, migration status, ethnicity, income level, disability, or other aspects of identity.**
- **Women migrant farm workers**, for example, may face both gender discrimination and barriers linked to migration status – such as limited access to formal representation, language barriers, documentation issues, or dependence on labour brokers.
- These overlapping factors mean certain groups are at higher risk of exploitation, exclusion from decisions, or harm – even when working in the same farm, factory, or region.

Suggested actions for companies:

- Tailor engagement approaches to make sure harder to reach voices are actively sought out, protected, and reflected in decisions to ensure more effective risk identification and stronger due diligence.
- Partner with trusted local organisations, unions, cooperatives, or community leaders to build access and trust.
- Allocate dedicated time and resources for inclusive participation, not just consultation with more powerful stakeholders.

Coffee from the Ankole Coffee Producers Cooperative Union (ACPCU) in Uganda. Photo: Mariano Herrera/Oxfam

3. Persistent social and environmental risks

The agriculture and food manufacturing sectors face a range of social and environmental risks – including low wages, unsafe working conditions, discrimination, gender-based violence, child or forced labour, land conflicts, water stress, chemical exposure, and broader environmental degradation and climate impacts.

These impacts often compound one another. Heat stress, for example, poses particular dangers for workers who are paid by piece-rate. When workers are paid by the task rather than by time, they face pressure to keep working through dangerous heat, risking exhaustion, dehydration, and injury. Women are 3.7 times more likely than men to suffer heat intolerance during physical work.[17]

Suggested actions for companies:

- Engage meaningfully to understand both social and environmental impacts and how they can interact – for example, how water scarcity increases manual irrigation needs, making fieldwork hotter and harder. This is especially the case for women, who are often assigned the most time-intensive tasks.

Fruit for sale at a stall in Las Delicias Market in Madrid. Photo: Luis Soto/Oxfam

4. Unequal power and high price pressure

Many supply chains in the sector are marked by stark power imbalances: concentrated buying power at the retail end and highly dispersed small-scale producers and workers at the other. Companies throughout the supply chain face pressure to deliver low prices and high volumes, and this pressure is often pushed upstream.

Many suppliers operate on thin margins as a result, limiting their ability to invest in safe working conditions, living incomes, or environmentally responsible practices. These structural imbalances can drive wage suppression, excessive working hours, reliance on informal labour, unsafe shortcuts, and the shifting of financial and environmental risks onto farmers and communities during periods of volatility, such as climate shocks and sudden price drops[18].

Words from rightsholders

In many parts of Brazil's agrifood sector, farming and local communities face serious impacts from land-use change, agrochemical use, and shifting production practices. The quotes below – drawn from rightsholder consultations for this guidance (cattle and sugarcane) show the serious consequences of decisions being made without genuine community involvement and respect for their rights:

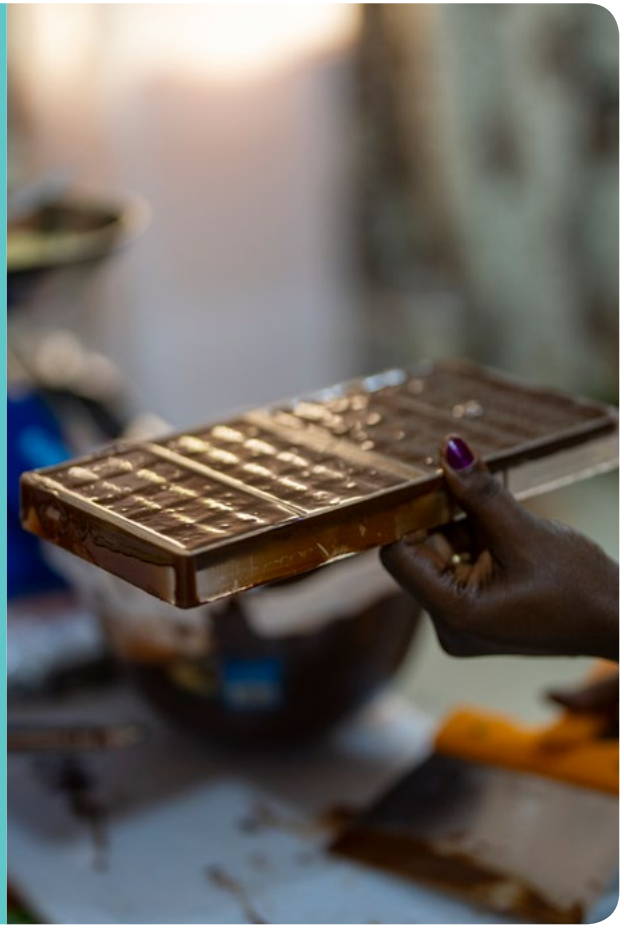
"[The company] was threatening, invading the crops, killing trees, killing springs with poison." – member of São Bento farm community, Itambé

"We learned through a court order that the property where we lived had been sold (...) suddenly a bunch of machines arrived, tractors with tracks, with harrows, armed police, armed security guards, and they said we had to leave, that they were going to tear everything down and take over what they had bought. They didn't communicate anything (...)." – member of São Bento farm community, Itambé

Suggested actions for companies:

- Assess purchasing practices as part of due diligence: Short lead times, unpredictable order changes, or below-cost pricing can directly contribute to human-rights risks.
- Engage suppliers and rightsholders to understand real production costs: Direct conversations with suppliers, farmers, workers, and local communities help reveal what it takes to sustain safe, decent livelihoods.
- Prioritise long-term, fairer trading relationships: multi-year contracts, transparent pricing models, and stable demand can reduce pressure on suppliers and improve conditions for workers and farmers.
- Factor power dynamics into engagement planning: Companies cannot entirely 'fix' systemic power imbalances but should aim to understand and address foundational issues where possible, and take measured efforts to ensure that affected stakeholders are not undermined and have the support necessary to engage effectively[19] (see case study on page 37). For example, recognise that smallholders and workers may feel unable to speak openly without independent facilitation. Design engagement processes that ensure safe, equal participation.

"Misrepresentation often arises from the fear of how information will be used. In agribusiness across East and Central Africa, engaging both farmers and employees is key to inclusivity, yet this transparency can breed suspicion, ultimately limiting accessibility." - Company representative.



Recognising the sector's characteristics allows companies to build engagement processes that are **realistic, practical, and genuinely responsive** to those most at risk.MSE is not only good practice but essential to ensuring responsible, resilient, and sustainable business conduct in agricultural value chains. Done well, it can deliver real benefits for companies and rightsholders (see "benefits of meaningful engagement").

Figure 1: Key stakeholders at different tiers of the agrifood value chain.

	Rightsholders – examples	Stakeholders - examples
 **Input suppliers (seed, fertilizer)**	• Factory and chemical plant workers. • Miners (for inputs like phosphate). • Workers, worker representatives, national and international[20] trade unions, and the IUF (the Global Union Federation for workers and their unions in the agrifood sector).	• NGOs and CSOs. • Suppliers. • Government bodies. • Workers, worker representatives, national and international trade unions, and the IUF.
 **Tier 4 Primary Production (farming, livestock, fishing, aquaculture)**	• Smallholder farmers. • Plantation workers. • Migrant/seasonal workers. • Fishers & vessel workers. • Local & Indigenous communities. • Workers, worker representatives, national and international trade unions, and the IUF.	• Farmer associations and cooperatives. • NGOs and CSOs. • Suppliers. • Government bodies. • Workers, worker representatives, national and international trade unions, and the IUF.
 **Tier 3 Aggregation & Primary Handling (collectors, packhouses, landing sites, sorting, bulking)**	• Collectors & market agents. • Casual labourers. • Transport & loading workers. • Local & Indigenous communities. • Workers, worker representatives, national and international trade unions, and the IUF.	• Farmer associations and cooperatives. • NGOs & CSOs. • Traders & intermediaries. • Suppliers. • Government bodies. • Workers, worker representatives, national and international trade unions, and the IUF.
 **Tier 1+2 Processing & Manufacturing (primary + secondary: slaughter, milling, drying, canning, packaging)**	• Factory workers. • Local communities near facilities • Workers, worker representatives, national and international trade unions, and the IUF.	• NGOs & CSOs. • Industry associations. • Suppliers. • Government bodies. • Workers, worker representatives, national and international trade unions, and the IUF.

	Rightsholders – examples	Stakeholders - examples
 **Tier 0 Retail (supermarkets, markets, restaurants, hospitality)**	• Warehouse, retail & hospitality workers. • Workers, worker representatives, national and international trade unions, and the IUF.	• NGOs & CSOs. • Retail & hospitality associations. • Suppliers. • Government bodies. • Workers, worker representatives, national and international trade unions, and the IUF.
 **Office, Logistics & Distribution (transport, ports, cold chain, corporate offices)**	• Warehouse workers. • Drivers & port workers. • Administrative staff. • Local communities. • Workers, worker representatives, national and international trade unions, and the IUF.	• NGOs & CSOs. • Logistics & transport associations. • Government bodies. • Workers, worker representatives, national and international trade unions, and the IUF.
 **Consumer use Food preparation, cooking, storage**	• Consumers, Households.	• Consumer groups, health agencies.
 **End of life Waste management, composting, recycling, landfill, circularity**	• Waste workers and pickers. • Local communities. • Workers, worker representatives, national and international trade unions, and the IUF.	• NGOs & CSOs. • Municipal waste services. • Recycling companies. • Workers, worker representatives, national and international trade unions, and the IUF.

Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

Benefits of meaningful engagement for businesses and rightsholders

When done well, meaningful engagement can create meaningful benefits for companies, stakeholders and rightsholders.

Benefits for business:

- **Stronger risk assessment, management, mitigation and prevention –** uncovering risks early through local insights.
- **Early warning system for conflict prevention – identifying risks (or actual impacts)** by addressing concerns before they escalate reducing tensions by addressing concerns before they escalate.
- **Compliance with legal and regulatory requirements –** including emerging due diligence laws.
- **Alignment with Free, Prior and Informed Consent (FPIC) –** especially in Indigenous contexts.
- **Improved supply chain resilience –** building stability through stronger relationships.
- **Access to local knowledge and expertise –** gaining valuable insights from those affected.
- **Opportunities for innovation –** co-creating solutions tailored to real-world challenges.
- **Stronger partnerships –** fostering collaboration with rightsholders, those representing them and other stakeholders.
- **Enhanced reputation –** building trust with stakeholders.
- **Increased investor confidence and appeal –** demonstrating responsible and sustainable practices.

Benefits for stakeholders and rightsholders:

- **Recognition and visibility –** amplifying rightsholder voices, experiences, and contributions.
- **Promotion of equity and inclusion –** hearing marginalised and underrepresented groups.
- **Claiming power –** supporting rightsholders to advocate for their interests.
- **Genuine participation in decision-making and co-creation of action planning –** involving rightsholders in shaping agendas and influencing outcomes.
- **Stronger protection of human and environmental rights –** safeguarding the rights, dignity, and wellbeing of rightsholders.

Men harvest tilapia fish in Nigeria. Photo: Maxwell Osarenkhoe / Oxfam

Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

What good looks like

Engagement is only meaningful when stakeholders and rightsholders can raise their perspectives early, continuously, safely, and on an informed basis, in an atmosphere of respect. Engagement should be:

Early and continuous

- **Early**: In advance of any decisions that may impact stakeholders and rightsholders, so that they can genuinely shape plans and outcomes, not react after they are set.
- **Continuous** – not as a one-off – so people can raise concerns, receive updates, and see how their input influences actions. This builds trust, accountability, and a clearer understanding of risks over time.

In practice: Before expanding cultivated land, a company meets nearby communities early to understand how the expansion might affect shared water sources or grazing areas. Community members identify sensitive areas and propose alternatives. The company keeps checking in during and after the expansion to share updates and adjust plans based on community feedback.

Informed and rights-based

- **Informed**: sharing information transparently and ensuring stakeholders and rightsholders fully understand what is at stake so they can participate meaningfully.
- **Rights-based**: recognising people should have power and freedom of choice and taking steps to understand their experiences, risks, and needs.

In practice: The company funds independent legal and technical support chosen by the community so they fully understand the implications of expanding cultivated land and can advocate for their rights. With this help, rightsholders review the proposal, identify risks to cultural sites, and suggest alternative land-use options. Their input directly shapes the final decision.

Safe and accessible

- **Safe:** allowing stakeholders and rightsholders to speak freely, and not exposing people to retaliation, harm, or discrimination.
- **Accessible:** proactively removing barriers that prevent people from engaging.

In practice: A company holds meetings with workers outside of peak harvest hours, providing transportation for all workers to attend consultations, and ensuring interpreters and translators are present for migrant workers. The meetings are held off-site and with the presence of trade union representatives so they can speak without fear of retaliation. The company provides support for childcare and other caring responsibilities workers have during the meeting time to ensure female workers can engage.

Inclusive and legitimate

- **Inclusive:** ensuring marginalised groups and those facing multiple forms of discrimination are represented.
- **Legitimate:** built on engagement processes that are credible, transparent and accountable to the people they represent.

In practice: A company ensures that female farm workers are interviewed separately, so power dynamics do not silence their concerns about issues like harassment or wage discrimination. The engagement is facilitated through the local trade union and for migrant workers not represented via the trade union, through a local women's organisation chosen by the migrant workers themselves.

Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

The pre-conditions for MSE: The importance of internal buy-in and alignment

Certain conditions need to be in place for MSE to be effective – and to ensure it leads to real insight and impact.

Leadership buy-in and commitment

Leadership support is critical but can require time and sustained effort. Tips include:

- Build a clear business case (see the list of benefits on page 14)
- Leverage champions and allies.
- Link MSE to company values and purpose.
- Use storytelling, which is demonstrably one of the most effective tools for changing hearts, minds, and behaviours.[21] Use language that resonates with your audience.
- Start small and showcase success. Consider piloting MSE in one high-risk commodity or geography to demonstrate quick wins and gather lessons to keep momentum.

"Leadership often sees rightsholder engagement as a low priority. This is where a nudging strategy can be effective: start small. For example, with a short 30-minute meeting to spark interest among a couple of key people, followed by a longer discussion – and eventually, perhaps, a workshop. Small steps can lead to big change over time."

Company Representative

Women farmworker harvesting wine and table grapes on Roeswater Farm in Rawsonville. Photo: Alexa Sedgwick/Oxfam

Adequate resources and capacity

Leadership backing helps secure the time, resources, and support needed for effective stakeholder engagement. Without it, engagement risks being under-resourced or poorly planned. This work requires specific skills, which may need to be developed through training or external support (e.g. to ensure expertise in gender).

Aligned internal processes

MSE must become part of everyday decision-making at all levels of the business. It cannot rest solely with sustainability or human rights teams. It requires cross-functional coordination – particularly with procurement, legal, compliance, and operations – as these functions directly influence the conditions in which people live and work.

Equally important is the connection between headquarters and regional or local teams (if relevant) who are often closer to local stakeholders and better positioned to build trust and engage stakeholders meaningfully.

Q&A: How do purchasing and sourcing practices ` influence the conditions for meaningful engagement?

Part 1: Understanding Meaningful Stakeholder Engagement in the agriculture and food manufacturing sector

MSE expectations in soft and hard law

Soft laws: Global soft-law standards – especially the UNGPs and OECD Guidelines – set clear expectations for risk-based human-rights and environmental due diligence. They require companies to engage proactively with affected stakeholders throughout the HREDD cycle. While non-binding, these standards as reflected in the OECD Due Diligence Guidance for Responsible Business Conduct, have become the global benchmark for responsible conduct, including in agri-food value chains. Expectations are included in:

- **UN Guiding Principles on Business and Human Rights (UNGPs): Principle 18.**
- **OECD Guidelines for Multinational Enterprises: Chapter II. General Policies, A.15.**
- Human Rights (OECD, 2011, Chapter IV).
- Employment and Industrial Relations (OECD, 2011, Chapter V).
- Environment (OECD, 2011, Chapter VI).
- Combating Bribery, Bribe Solicitation and Extortion (OECD, 2011, Chapter VII).
- Consumer Interests (OECD, 2011, Chapter VIII).
- Disclosure (OECD, 2011, Chapter III).

Hard law: A growing body of binding due diligence legislation now embeds these soft-law principles. Europe has been the frontrunner, introducing the most comprehensive mandatory frameworks. Stakeholder engagement is included, among others, in the following directives or laws:

EU Corporate Sustainability Due Diligence Directive (CSDDD), Article 13
- **Binding EU law:** CSDDD (as amended by Omnibus I) came into force on 18 March 2026. Member states need to transpose by mid-2028 and most provisions will apply from 2029 onward.
- Explicitly requires stakeholder-informed due diligence.

French Duty of Vigilance Law, Article 1
- Binding national law: Applies to large French companies and certain foreign companies operating in France.
- Requires vigilance plans and consultation with relevant stakeholders.

German Supply Chain Act (LkSG), Section 4.4
- Binding national law: Applies to companies meeting employee thresholds operating in Germany.
- Calls for engagement with potentially affected persons where needed for risk prevention and mitigation.

Norwegian Transparency Act, Article 4
- Binding national law: In force since 2022, requiring human-rights due diligence and public disclosure.
- Engagement is expected where necessary to assess and address risks.

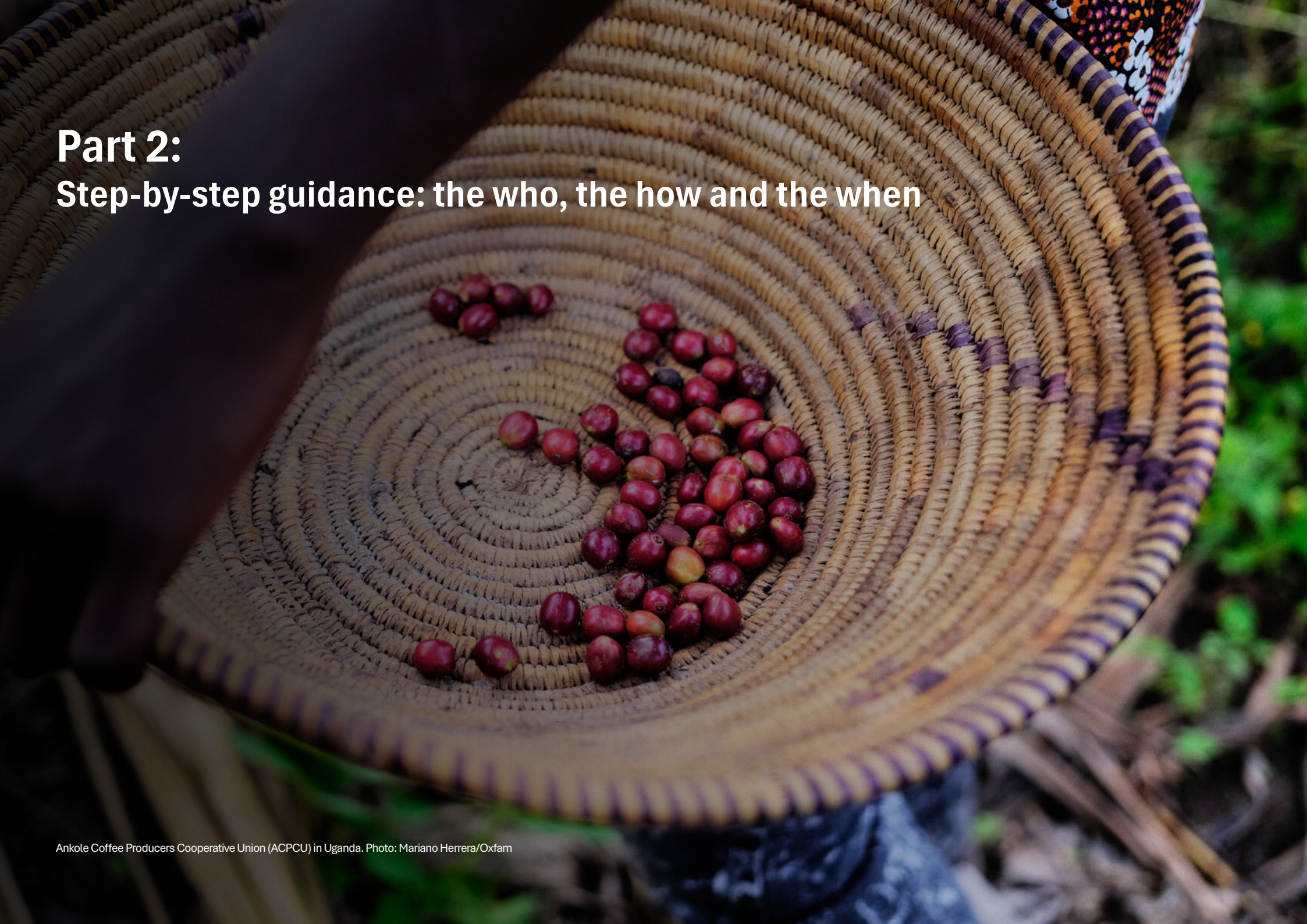
Companies in the agriculture and food manufacturing sector operating or selling in these jurisdictions must be able to show how stakeholder engagement has shaped their policies, risk assessments, prioritisation decisions, and remedial actions.

The guidance also recognises the international instruments of protection for workers and communities from the ILO such as the Fundamental Principles and Rights at Work, the Multinational Enterprises and Social (MNE) Declaration and the ILO Convention C144 - Tripartite Consultation Convention.

This guidance reflects best practice rather than the requirements of any specific law or standard. For compliance advice on a particular law, please seek legal counsel.

For more information on these laws and the requirements regarding MSE, please see the STITCH Technical Guidance on Meaningful Stakeholder Engagement in Garment, Apparel and Textile Sectors

Part 2:
Step-by-step guidance: the who, the how and the when



Ankole Coffee Producers Cooperative Union (ACPCU) in Uganda. Photo: Mariano Herrera/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when.

Who – identifying and prioritising stakeholders for engagement

A foundational step in any human rights and environmental due diligence strategy is identifying and mapping stakeholders and potentially affected groups.

To identify, prioritise and engage with stakeholders (in particular rightsholders), teams should take the following steps. While depicted as a linear process, this process is often more dynamic and iterative, and will vary by context.

Use the stakeholder mapping tool to support steps 1-3:

- Define the scope and objectives of your engagement.
- Map your value chain.
- Identify relevant rightsholders and stakeholders.
- Prioritise engagement based on risk to people.
- Develop a Stakeholder Mapping Dashboard that serves as a foundational building block for meaningful, ongoing stakeholder engagement.

Detail shot of grapes during harvesting in a vineyard in Rawsonville (Roeswater Farm). Photo: Alexa Sedgwick/Oxfam

Step-by-step guidance on the "who":

1. Define scope and objectives of the engagement
2. Map stakeholders, including affected groups
3. Prioritise stakeholders to engage
4. Analyse engagement context

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 1: Define the scope and objectives of engagement

Start by clearly defining the scope and objectives of the engagement. This ensures the process is focused, proportionate, and aligned with the company's human rights risks and responsibilities. Understanding your 'why' helps to inform who, how and when to engage.

Depending on the objective, the mapping and engagement may cover a different scope, for example:

- **Company-wide**, such as when developing a human rights policy or establishing a group of stakeholders who can provide advice on ongoing work on human rights.
- **Policy-specific,** for example developing policies which cover Indigenous Peoples' rights or gender equality.
- **Project-specific,** such as a site- or country-level assessment of human rights impacts.
- **Product-, process-, or value-chain–specific,** for instance when assessing risks linked to a product, raw material or sourcing region.
- This will influence the scope and depth of engagement, described further in the **How and When** sections.

Fresh food packaging process, United Kingdom. Photo: ETI /Claudia Janke

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 2: Map stakeholders, including affected groups

Conduct stakeholder mapping with priority to rightsholders and their legitimate representatives, such as trade unions or community leaders. Companies should also identify and engage individuals or organisations that play a critical role in addressing human rights risks – such as NGOs, human rights organisations, human rights defenders and community-based organisations, who can provide guidance and expertise.

Treat mapping as a dynamic and iterative process that is regularly updated as business activities and insights evolve.

Stakeholder mapping should consider:

- **Groups most impacted:** Mapping should prioritise those (potentially) affected by company activities.[22]
- **Value chain coverage:** Where relevant, consider all stages of the supply chain and relevant actors, including hidden or under-reported ones (see case study on page 32).
- **Environmental considerations:** Identify where operations, supply chains, or products interact with the environment, noting associated environmental risks, human rights impacts, and who may be affected.
- **Visibility of stakeholders:** Look beyond well-organised or visible groups. Less visible stakeholders – such as migrant or seasonal workers, Indigenous Peoples, or children – may face higher risks and have limited ability to voice concerns. Rural isolation and informality also often increase risks of exclusion.
- **Extended impacts:** Account for indirect impacts, for example on workers' families or communities affected by land and water use, particularly in agriculture, where workers and their families may live on-site.
- **Inclusivity:** Ensure all groups are represented, with particular attention to gender (see case study on page 32), groups in vulnerable positions or experiencing marginalisation, and intersecting and compounding risks.
- **Key information:** Capture details that affect how different groups experience impacts, including identity factors such as migration status, socio-economic status, gender and age.

Use expertise and partnerships

- Engage trade unions, NGOs, community organisations, knowledge institutions, and national human rights institutions to help identify rightsholders and avoid blind spots – especially for complex supply chains with limited traceability. Find out more about getting in touch with key stakeholders on page 35.

Good practice: Establish stakeholder advisory panels to provide regular feedback on the (potential) human rights and environmental impacts as well as rightsholders relevant to your company.[23]

Learn more: The United Nations Development Programme guidance on Human Rights and Environmental Due Diligence (HREDD[24]) helps companies identify environmental risks and associated human rights risks through a continuous process that combines scientific evidence and stakeholder engagement.

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 3: Prioritise and select who to engage

Once stakeholders are mapped, companies should prioritise who to engage. A **rights-based approach requires** prioritisation driven by risk **of harm, vulnerability, and severity of impact**, not by a stakeholder's power or leverage.

This means companies must intentionally focus on those who are **most affected or at heightened risk,** even if they have limited visibility, voice, or influence.

Key considerations to prioritise stakeholders include:

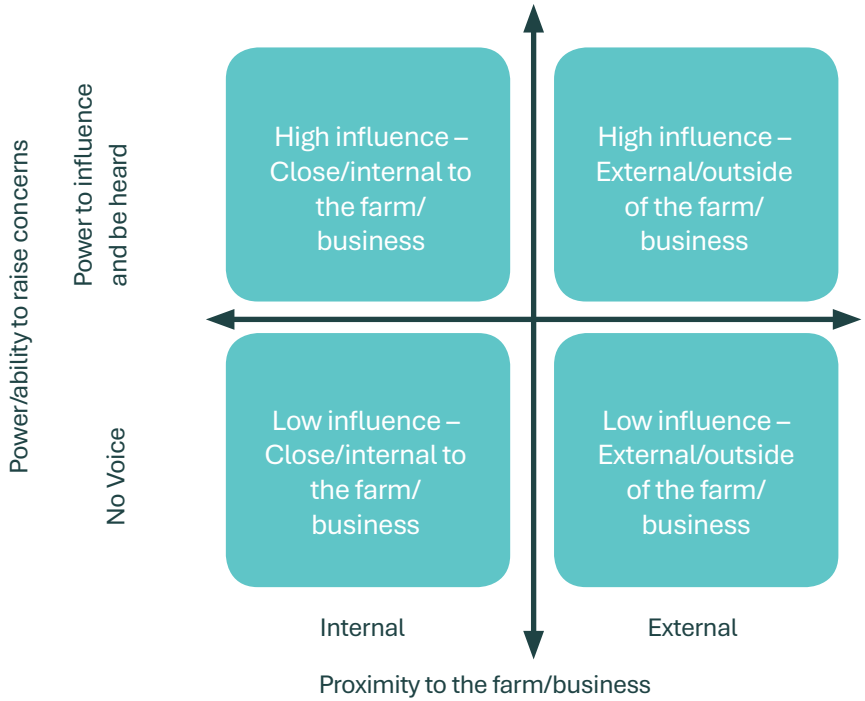
- **Relevance**: Consider the proximity of impacts being explored and the exposure of individuals or groups to impacts.
- **Knowledge:** Consider how much knowledge stakeholders have of the impacts, how much they have directly experienced these impacts and whether they have specific technical expertise they can bring to a consultation e.g. around agricultural practices or community norms.
- **Segment stakeholders:** Identify rightsholders who are directly affected, at higher risk, or already experiencing negative impacts, including those with little power to influence decisions - such as women, Indigenous Peoples, children, seasonal and migrant workers, non-union-ised workers, and informal land or resource users.

Use power analysis to guide engagement

Power analysis is a practical tool to support more equitable representation in the engagement process. A robust power analysis helps ensure that engagement efforts are inclusive and avoid reinforcing already existing inequalities.

One practical approach is to map rightsholders by their proximity to company decision-making and their ability to raise concerns:

Figure 2: Power analysis matrix



Priority should be given to groups facing high risk and low power

Part 2: Step-by-step guidance: the who, the how and the when

Key questions to support power analysis

- How close are different stakeholders to company decision-making?
- How effectively and safely can they raise concerns within existing structures?
- Who faces barriers to participation?
- Are there risks of retaliation for speaking up and how does that affect specific groups or individuals?
- Who holds power (visible or hidden) and who does not?
- Are there differences linked to gender, ethnicity, race, class, migration status, or employment status and conditions?
- Which structural factors influence power – for example, the role of supply-chain intermediaries, recruitment agencies, hiring and promotion practices, gender norms, and level of unionisation?

Use these insights to **adapt engagement methods** so that rightsholders with less power have safe, accessible, and meaningful ways to participate (more on this in the **How** section).

Learn more:
A quick guide to power analysis

Buckets of cocoa gums (seeds) for the selection and storage, fermentation and drying process in São Tomé and Príncipe. Photo: Oxfam Intermón

Part 2: Step-by-step guidance: the who, the how and the when

Identify legitimate representatives

At this stage, companies also need to identify legitimate representatives. In most cases, companies should prioritise engaging with representatives, where possible, to avoid overburdening individual workers, community members, and other right-sholders, to help preserve anonymity, and - most importantly - to avoid undermining established engagement structures. However, it is essential that companies verify that the representatives they engage with are legitimate and genuinely reflect the interests and concerns of those they claim to represent.[25]

"As a buyer we are 1-2 steps removed from the rightsholder, understanding who can speak on their behalf, who is the right representative or channel and how to trust that information and make sure they can speak openly is key."

Company representative

- **Workers and trade unions:** Where a legitimate trade union exists and a company seeks to engage with workers, the trade union – as the legitimate representative – should be engaged first and foremost[26]. This ensures that established industrial relations and social dialogue are respected. Freedom of association and collective bargaining are fundamental to improving working conditions in international supply chains, as they enable workers to collectively advocate for their rights.
- **Community representatives:** Where there is an established and recognised system in place for selecting community representatives (e.g. elections, traditional leadership, council structures), these should be engaged first and foremost.
- Assess whether representation is **inclusive** across different groups, and address gaps. For example, in some contexts, workers who are not in permanent roles may not have the same access to trade union representation as those in permanent roles. Structural barriers may also limit the participation and representation of certain groups, including migrant workers, women, and young workers. Engagement processes should therefore recognise potential gaps in representation and support inclusive participation, for example by encouraging women and young people to join unions.
- **Elected worker representatives,** to the extent provided for under national law, can be a starting point for dialogue where trade unions are not present or are effectively prohibited by law. It is important to note that elected representatives do not have a legal mandate to represent workers in collective bargaining and cannot be used as a means to undermine or avoid the organisation and registration of trade unions. Such mechanisms are not effective substitutes for industrial relations or collective bargaining conducted by union representatives. Where elected representatives are present, workers should be actively supported in exercising their Freedom of Association – the right to form or join a union of their own choosing.

- See the list of rightsholder groups, examples of legitimate representatives and proxies on page 28.
- See the annex on trade unions and worker representation and what they mean for MSE for more information and guidance.
- Check these ETI resources to learn more about Working with trade unions, progressing worker representation and entry points to worker representation.

Part 2: Step-by-step guidance: the who, the how and the when

Identify proxy representatives where relevant

- Identify **credible proxies** where relevant. Direct engagement is preferred, but where it could put people at risk (for example, human rights defenders in repressive settings or unionised workers at supplier sites who disclose sensitive information), use trusted proxy representatives or human rights experts.

- Proxies such as labour rights organisations (LROs), NGOs and community-based organisations can support engagement with communities and train companies and staff on engagement, provided they are legitimate and appropriate representatives of the stakeholders concerned. (see Q&A: How can the legitimacy of trade unions and community representatives be assessed?)

- Identifying credible proxies or legitimate representatives may not be possible in all contexts (e.g. in cases of state-imposed forced labour). In such situations, consider alternative approaches, such as engaging diaspora groups or other knowledgeable actors who can provide insights on the risks.[27]

Farmworkers harvest wine and table grapes from a vineyard in Rawsonville. Photo: Alexa Sedgwick/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when

Spotlight on: Indigenous Peoples and affected communities.

When engaging with Indigenous Peoples and affected communities, companies should take a rights-based, context-sensitive approach. Key considerations to support meaningful, inclusive, and respectful engagement include:

Identify direct and indirect impacts: Determine whether Indigenous Peoples or other communities may be affected. Be aware that impacts may extend beyond directly affected groups, for example, to land users, informal workers, women and children.[28]	**Respect FPIC:** Where Indigenous Peoples are present, ensure engagement fully complies with Free, Prior and Informed Consent (FPIC) (see next page).	**Understand local context:** Analyse local socio-economic and cultural factors to identify specific vulnerabilities, power dynamics, and community priorities.[29]	**Engage legitimate representatives:** Work with recognised community representatives or trusted intermediaries where direct engagement is not safe or feasible. Seek to verify their legitimacy, credibility, and representativeness with the community itself.

Address power inequalities: Recognise that communities often face structural disadvantages in engaging with companies. Support meaningful participation by ensuring access to relevant information, independent advice, and expertise so engagement can take place on fair, informed, and respectful terms.

Learn more:

The UN Global Compact Network France practical guide on how to engage communities **'Businesses – Affected Communities, Adopting a Human Rights-based Approach for Meaningful Engagement and Effective Impact Management'.** [30]

Part 2: Step-by-step guidance: the who, the how and the when

Spotlight on: Indigenous Peoples and affected communities

Free, Prior & Informed Consent (FPIC) and the right to say no
FPIC is a human right of Indigenous Peoples under international law. It ensures they have a say in whether and how corporate activities, affecting their lands, resources, or lives. move forward. FPIC is especially relevant in the agri-food sector, where activities such as plantations, large-scale farming, livestock grazing, and access to land, water, forests, or seeds often intersect with Indigenous (and community) rights.

FPIC is a collective decision-making process that protects autonomy and self-determination. Consent must be free (voluntary, without coercion), prior (before activities begin), and informed (based on full and accessible information).

FPIC is increasingly recognised as best practice for all affected communities. It strengthens project legitimacy, reduces social conflict, and is a key rights-based safeguard against human rights abuses and inequality. (to learn more see Oxfam's 'Recharging Community Consent').[31]

FPIC is grounded in international instruments such as United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP),[32] ILO Convention 169[33], the Convention on Biological Diversity (CBD),[34] and relevant national laws.

Women farmworkers harvest wine and table grapes on Roeswater Farm in Rawsonville. Photo: Alexa Sedgwick/Oxfam

Rightsholder groups, legitimate representatives and proxies

Rightsholder group	Common legitimate representatives	Examples of proxy representatives	Practical notes
Workers (where a union exists)	**Trade unions (local, sectoral, national); Global Union Federations (GUFs)**	Worker support NGOs; labour rights organisations	Where independent, democratic trade unions exist, they are the legitimate representatives and should be engaged first. Assess whether the trade union is genuinely representative of all relevant groups of workers, including women, migrant workers, or temporary workers, and address gaps.
Workers (where no union exists and/or is restricted by law)	**Worker committees**	Labour rights organisations (LROs), NGOs	Where trade unions are not present or are effectively prohibited by law, elected worker representatives can be a starting point for dialogue – to the extent provided for under national law (see p. 24 and the annex on trade unions for more information). In accordance with ILO Convention 135, "elected representatives… [are] representatives who are freely elected by the workers in accordance with provisions of national laws or regulations or of collective agreements and whose functions do not include activities which are recognised as the exclusive prerogative of trade unions in the country concerned" (such as the legal mandate to represent workers in collective bargaining).It is also important that non-union worker committees are not used as a means to avoid the organisation and registration of trade unions, and that support and encouragement is provided to enable genuine Freedom of Association.
Small-scale farmers	**Farmer cooperatives; producer organisations**	Agricultural NGOs; rural development organisations	Check whether cooperatives represent women, tenant farmers, and marginalised producers.
Indigenous Peoples	**Indigenous governance bodies; councils of elders; traditional authorities**	Indigenous rights organisations; human rights NGOs	Engagement should align with FPIC. Proxies can support culturally appropriate processes but should not override community decision-making.
Local communities	**Community leaders; village councils; community-based organisations**	NGOs; faith-based organisations; local CSOs	Community leaders may not represent all voices - complement with broader consultations where needed.
Women (cross-cutting)	**Women's committees; women representatives within unions or cooperatives**	Women's rights organisations; local CSOs	Women-only engagement spaces may be needed to ensure safety and openness.
Migrant workers	**Migrant worker associations**	Migrant rights NGOs; local CSOs	Trusted intermediaries are often critical due to language barriers and fear of retaliation.
Children and youth (where relevant)	**Guardians; community child protection committees**	Child rights organisations	Direct engagement requires strict safeguarding and specialised expertise.

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 4: Consider context and barriers for engagement

Before engaging, companies should assess the context in which engagement will take place and identify potential barriers that could limit safe, meaningful, and inclusive participation. This helps companies choose appropriate engagement methods, avoid harm, and reduce engagement fatigue.

Assess trust and willingness to engage:

- Assess whether there is existing trust or whether trust-building is needed before meaningful engagement can take place (see strategies to foster trust on page 31).
- Recognise that some rightsholders may be unwilling to engage due to lack of trust, previous negative experiences, or perceived risks. Where appropriate, invest in trust-building or engage through trusted third parties to capture concerns safely and effectively (see case study on page 33).

Identify barriers to participation

- Assess accessibility barriers such as literacy, language, digital access, travel distance, time constraints, or childcare responsibilities. Consider who is affected by these barriers, including people who face multiple barriers.
- Select a location that limits barriers to participation, for example by selecting a place that is safe, comfortable and accessible, which could be a hired room or a shaded public area depending on the context. Consult local partners to identify a suitable location.
- Consider cultural norms, social hierarchies, and power dynamics that may limit who speaks or is heard.

Ensure safety, confidentiality, and risk awareness

- Prioritise the safety of rightsholders. Assess whether engagement could expose individuals or groups to retaliation, intimidation, or harm (physical, psychological, social, or reputational). Where direct engagement is unsafe, consider proxy engagement or using a neutral facilitator (see case study on page 37).
- Determine whether anonymity, confidentiality, or safe spaces are required, particularly in high-risk or conflict-affected contexts.
- Identify any points of potential conflict with or between stakeholders, for example stakeholder groups with conflicting interests, and consider separate engagement.

Apply a gender and inclusion lens

- Ensure engagement is inclusive by considering gender and intersecting risks related to age, race, ethnicity, migration status, disability, or socio-economic position.

"True inclusion means accounting for more than just attendance consider transportation, meals, childcare, and daily responsibilities. Plan with care so participation does not create additional burdens, and always respect the realities of home duties and market days."

Company representative

Part 2: Step-by-step guidance: the who, the how and the when

- Consider separate, targeted consultations if not all barriers can be addressed at the same time, such as various language groups for migrant women or accessible formats for persons with disabilities.
- Where multiple issues affect the same rightsholders, assess whether they can be addressed through a single coordinated process.

Consider engagement history

- Review previous or ongoing engagements with the same rightsholders to ensure lessons learned are incorporated and information is not repeatedly requested.
- Identify existing engagement processes (by the company or others) and coordinate where possible to avoid over-consultation and engagement fatigue. (See Q&A: How can companies address the problem of "consultation fatigue" which leads to low engagement?).

Map the engagement context

- Consider the value chain, physical location, and other actors engaging with the same stakeholders.
- Clarify roles and responsibilities with business partners and consider joint or collective engagement where appropriate, particularly in complex supply chains.
- In regional or multi-stakeholder processes, ensure engagement remains grounded and does not rely solely on proxies that may not fully represent affected communities.

By combining mapping, prioritisation, and contextual analysis, companies can ensure that engagement is inclusive, targeted, and responsive to human rights risks focusing on those most affected while reducing harm, disengagement, and fatigue.

"As a member of amfori and the Speak for Change grievance mechanism, we handle grievances together with other buyers. In some cases, this cooperation has worked really well - our size in our country gives us influence, but internationally our purchasing power is limited, making collaboration with other businesses crucial."

Company representative

Coffee from the Ankole Coffee Producers Cooperative Union (ACPCU) in Uganda. Photo: Mariano Herrera/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when

Strategies to foster trust

Building trust with rightsholders is essential for meaningful engagement, particularly when addressing sensitive human rights issues. However, this trust is not easily established, especially in sectors like agriculture and food, where power imbalances, past harm, or lack of transparency often undermine relationships. Trust cannot be rushed, it must be earned over time through consistent, respectful, good faith and inclusive practices.

Some strategies to foster trust include:

- Ensure that engagement processes are voluntary, confidential and anonymous, and respectful of participants' rights–including the right to withdraw at any time.
- Close the feedback loop and follow through on commitments: rightsholders need to see that their input leads to tangible outcomes.
- Be transparent about why you're engaging, what the process involves, how their input will be used, and what you can and can't do.

"It is easy to raise expectations when engaging directly with rightsholders and their representatives. Clearly defining the purpose and the aim of engagement is always challenging, but necessary to ensure it is meaningful. Including stakeholders from the very beginning is essential, yet doing so without raising expectations beyond that particular dialogue remains a significant challenge."

Company representative

- Address access challenges, such as limited time with workers or logistical barriers.
- Address power imbalances, for example by involving trusted intermediaries (e.g. NGOs, unions, or community leaders) and building the capacity of rightsholders so they can build the confidence and trust to engage.
- Ensure engagement is relational, not transactional and grounded in humility, active listening, and a long-term commitment to addressing power imbalances and adapting to the needs and realities of those most affected.
- Be patient. This might mean that you might not be able to consult with specific people or groups when you planned it and that the engagement will take place later in time.

Part 2: Step-by-step guidance: the who, the how and the when

Learning from practice

Mapping rightsholders and risks: Women in seafood value chains

In seafood value chains, women are concentrated in post-harvest and processing roles that are often precarious (including temporary, agency and informal work), leaving them with little power or protection. These roles are critical to product quality and supply continuity, yet they are frequently over-looked in engagement activities and are not always visible in audits and reporting – especially further down the value chain. Making these roles, their limited power, and associated risks visible during stakeholder mapping is essential; otherwise, key issues – such as low pay, unsafe transport, harassment, and restricted access to grievance mechanisms – may remain unrecognised and unaddressed.

Examples of women's roles in seafood value chains per segment and identified risks:

Value-chain segment	Women's roles	Identified risks
Industrial processing (tuna/shrimp)	**Sorting, cleaning, packing, canning**	Lowest-paid roles, temporary/agency work, unsafe transport, limited grievance access, exposure to discrimination, unhealthy working conditions, harassment or exploitation.
Small-scale fisheries	**Sorting, cleaning, packing, micro-logistics, selling fish at local markets**	Informal work, unpaid care workload, seasonal vulnerability, exposure to harassment or exploitation.
Post harvest fishing operations	**Mostly shore-based support: handle sorting, cleaning, small-scale logistics, selling fish at local markets**	Access and safety constraints, limited voice and low participation in decision-making, exposure to harassment or exploitation.

What companies can do:

- **Map roles by gender and segment:** Collect gender-disaggregated workforce data across segments – including processing plants, small-scale fisheries, and shore-based logistics – and ensure informal seasonal and migrant work is included.
- **Consult the IUF and local trade unions** on issues facing women workers and possible ways to address them at global and local level. Use the findings to validate and improve stakeholder mapping and risk identification. Develop an action plan to resolve existing issues – for guidance see the ETI GAIA Principles to end gender-based violence and harassment in commercial agriculture and fisheries.
- **Monitor and incentivise suppliers:** Include KPIs such as gender-disaggregated workforce data and coverage of the workplaces by collective bargaining agreements, which address problems faced by women workers, and functioning grievance mechanisms. Support and reward suppliers showing improvement.

Part 2: Step-by-step guidance: the who, the how and the when

Learning from practice

Engaging through trusted intermediaries and adapting to local realities

For this guidance paper, Oxfam's local partner engaged directly with communities in Brazil affected by agricultural activities, including cattle and sugar-cane production, to understand from rightsholders themselves what meaningful engagement looks like in practice. In these contexts, trust in companies is often extremely limited due to a long history of human rights abuses, conflict, and violence.

In such settings, working through a **trusted local partner is critical.** The partner had long-standing relationships with the communities and acted as an intermediary, helping ensure that a wide range of community voices were heard, including those that might otherwise be excluded. Initial plans for a single workshop proved insufficient, as communities were geographically dispersed. Instead, the partner travelled to multiple locations – an approach that required additional time and resources and was reflected in the engagement budget. **Strong safeguarding measures** were also essential. Some human rights defenders faced risks of retaliation, making anonymity and careful handling of information necessary.

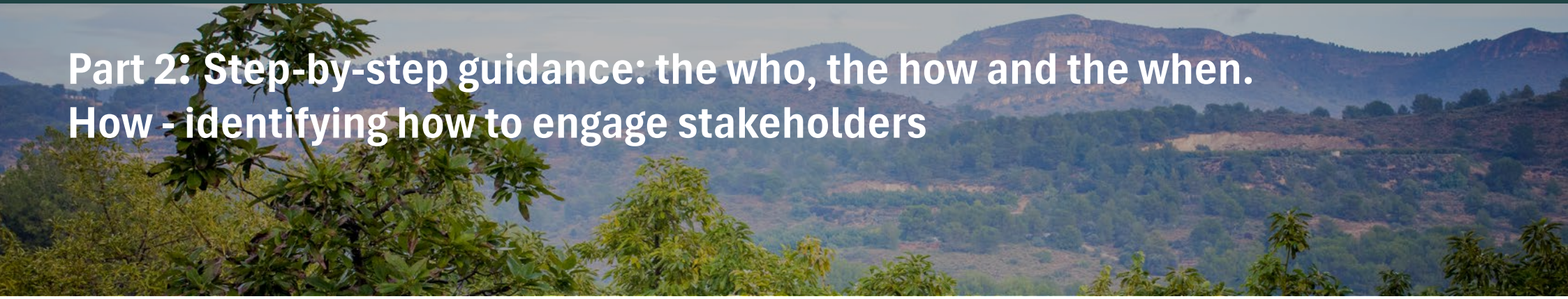
What companies can do:

- Adapt engagement design to local realities.
- Invest in trusted intermediaries where relevant.
- Prioritise safety to enable meaningful and inclusive participation.

"The company has no relationship with the community. The only relationship is conflict."

Member of the Barro Branco community, Jaqueira, Brazil

Photo by Velik Ho on Unsplash



Part 2: Step-by-step guidance: the who, the how and the when.
How - identifying how to engage stakeholders

After identifying and prioritising stakeholders, the next step is to explore effective strategies to reach and foster meaningful engagement. The following steps offer guidance on how to do this.

While depicted as a linear process, this process is often more dynamic and iterative, and will vary by context.

Step-by-step guidance on the "how":

5. Determine how you can reach your stakeholders

▼

6. Agree on format and tools

▼

7. Engage and adapt your approach

▼

8. Take action & monitor

Women farmworker harvesting wine and table grapes on Roeswater Farm in Rawsonville. Photo: Alexa Sedgwick/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 5: Determine how you can reach your stakeholders

Identify how to reach stakeholders:

The next step is to identify how to reach relevant stakeholders. The appropriate approach will vary depending on the stakeholder group, the level of risk, and the existing relationship.

In some cases, direct access is appropriate, in others, reaching stakeholders should involve legitimate representatives or trusted proxies (see page 33).

If there is no trusted relationship, some relationship-building may be required before meaningful dialogue can take place. This could involve repeated interactions, collaboration with credible local actors, or smaller, informal engagements before more structured engagement processes (see box on how to build trust on page 31).

Workers

- Where worker representation exists: Through a global or international trade union federation, or bodies comprised of trade unions e.g. IUF Agricultural Workers Trade Group (AWTG), The European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT/IUF-Europe), and confederations such as International Trade Union Confederation.
- Where no worker representation exists: through your suppliers, purchasing offices or local compliance and quality teams, who interact with workers.
- Through local NGOs, such as those representing migrant workers, or local labour rights organisations (LROs).

Indigenous and local communities

- Contact influential community members, such as village elders or other local leaders (e.g. 'sarpanch' in India).
- Draw on the knowledge and contacts of local civil society organisations, research institutions, government entities, networks of international organisations, or Embassy offices.
- Reach farmers and small-scale processors through cooperatives or intermediaries like local traders.

Environment

- Engage qualified environmental organisations, conservation experts, independent specialists, and affected communities, and consult credible scientific data and authoritative environmental assessments to identify where activities may cause environmental harm and related human-rights risks.
- Young people and future-focused groups can bring valuable long-term and intergenerational perspectives.[35]
- Examples include: World Wide Fund for Nature, International Union for Conservation of Nature, local conservation NGOs, or national environmental agencies.

The Aromatic Fresh process on how to plant basil seedling. Photo: Bryson Sayuni/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when

Suppliers

- Reach this group through procurement teams or local purchasing offices (if available).

Knowledge institutions(examples)

- Business & Human Rights Centre.
- Danish Institute for Human Rights.
- International Labour Organization (ILO).
- UN Food and Agriculture Organization (FAO).
- Fair Labor Organisation (FLA).
- Oxfam.

Determine who should lead the engagement

Consider whether engagement should be led by someone within the company or whether it would be more effective to involve a neutral facilitator or trusted intermediary. In high-risk or low-trust contexts, third parties such as trade unions, NGOs, community organisations, or independent experts can help create a safe space, reduce power imbalances, and enable more open and honest dialogue. When there are gendered and sensitive risks, such as gender-based violence and harassment, consider working with female facilitators and heightened safeguarding policies (see case study on page 49).

Consider questions such as:

- What (relevant) experiences has your company had with this stakeholder?
- What is the nature of the relationship with this stakeholder? (e.g. direct/indirect, personal/business, trusted/distrustful)trustful)(i).
- What is the stakeholder's attitude towards your company? (e.g. constructive, critical)?[36]

To learn more about the soft skills needed for meaningful engagement – such as active listening, conflict sensitivity, trust-building, and facilitation – please refer to step 2 of the COBHRA tool for additional guidance and examples.

Fruit for sale at a stall in Las Delicias Market in Madrid. Photo: Luis Soto/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when

Learning from practice

Facilitating dialogue between farmers and buying companies to address trust issues and power imbalances

Trust gaps, complex supply chains, limited capacity, and power imbalances often hinder meaningful engagement between producers and buyers. Fairtrade piloted a two-year initiative (2024-2025) to support direct, supply chain-specific dialogue between producer organisations and buying companies.

The approach works through:

- Capacity building workshops that prepare both sides, covering HREDD, power dynamics, and cultural context. Buyers reflect on root causes (e.g. unfair purchasing), while producers map risks and gain confidence to engage.
- Facilitated dialogue sessions led by Fairtrade ensure balanced, culturally sensitive conversations focused on shared priorities.
- Inclusive engagement of farmers, workers, women, youth, and marginalised groups, supported by local Fairtrade organisations. Gender and age quotas ensured a minimum number of women and young farmers participated.
- Two-round dialogue allows time for trust-building, reflection, and follow-up.

Lessons learned

- Preparation and capacity building are key to balancing power, building trust, and fostering shared responsibility.
- Neutral facilitation creates safe space for open, constructive dialogue.
- Ongoing collaboration surfaces root causes more effectively than one-off consultations.

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 6: Agree on format and tools

Choosing the right format and tools is critical to ensuring meaningful engagement – and this should be revisited as understanding of the context deepens.

"Engagement processes that are highly standardised and rigid, make it difficult for rightsholders to participate meaningfully. They are often reduced to form-filling exercises or brief, half-hour consultations, without adapting to existing local and autonomous processes that are already in place."

NGO representative

Agree on formats and tools

- Assess what adaptations may be needed to connect with stakeholders, considering any barriers identified in step 4, such as rural context, access to technology, languages used, and level of literacy.
- Adapt engagement formats as needed (e.g. translation, accessible material, compensation for time and transport, childcare support).
- Whenever possible, decide jointly with the stakeholder on suitable methods (e.g. focus groups, interviews, surveys, workshops).
- Remain open to course correction if initial tools prove ineffective.
- Align timing with local realities (e.g. harvest seasons, cultural norms, public holidays).
- Refer to Step 4 for reviewing lessons learned from past engagement regarding formats and tools.

Determining whether stakeholders can be engaged jointly

- Consider whether different stakeholders can be engaged in the same engagement process, taking into account power dynamics and relationships.
- For rightsholders, assess whether multiple issues affecting them can be discussed together without overburdening participants.
- Consider whether, in some cases, separate engagement may be more beneficial. For example, if there are risks around gender-based violence and harassment, interview women separately to create a safe space to speak up on these sensitive issues.

Planning budget and resources for engagement

- Ensure the budget covers key engagement costs, such as fieldwork, translation, safeguarding, and analysis, and allocate sufficient time and appropriately qualified personnel or partners.

See the annex on engagement tools for a list of possible tools, their benefits and limitations.

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 7: Engage and adapt your approach

Meaningful engagement requires preparation, respectful dialogue, and follow-up. Remain open to adapting the approach as you go along.

Before engagement: prepare and set expectations

- Coordinate internally: Align with relevant functions (e.g. sustainability, procurement, HR, legal) and assign clear roles for planning, facilitation, documentation, and follow-up.
- Be transparent and honest with the stakeholder: Clearly explain:
  - The purpose of engagement.
  - The company's activities and decisions under consideration.
  - How stakeholder input will be used.
  - Any limitations (e.g. engagement may not lead to immediate changes for individuals).
- This enables informed, constructive participation and manages expectations.
- **Obtain informed consent** and apply safeguarding measures to ensure confidentiality, anonymity, and protection from retaliation.

During engagement: create a safe and respectful space

- Use open-ended questions and listen actively; be curious, respectful, and non-defensive.
- Adapt communication style to local cultural, linguistic, and business norms – such as directness, formality, forms of address, hierarchy, dress, and timing –
  to build trust and avoid misunderstandings.

After engagement: agree next steps and stay connected

- Agree with rightsholders on next steps, including actions to address identified impacts and how progress will be followed up.
- Ask for feedback on both the process and outcomes of the engagement.
- Where relevant, establish feedback loops and ongoing communication channels.
- Engagement is continuous – staying connected between formal processes builds trust and means the next engagement starts from a stronger foundation.

See the annex on engagement tools for a list of possible tools, their benefits and limitations.

Part 2: Step-by-step guidance: the who, the how and the when

Guidance on step 8: Take action and monitor

Engagement should lead to concrete action.[37] Companies should act on outcomes, capture lessons learned, and monitor whether actions are delivering real improvements on the ground.

Capture learning

- Document and share internally what worked well and what did not.
- Identify remaining gaps, blind spots, or unanswered questions.
- Use insights to strengthen future engagement and due diligence processes.

Take action

- Translate engagement outcomes into clear actions, such as updating policies, adjusting purchasing practices, or implementing HRIA action plans.
- Clarify responsibilities across relevant functions (e.g. sustainability, procurement, HR).
- Set realistic timelines and ensure actions are adequately resourced.

Plan for ongoing communication and course correction

- Establish feedback loops using appropriate tools for ongoing dialogue.
- Stay engaged with stakeholders and especially rightsholders to understand whether actions are working as intended.
- Adjust the approach where needed to remain responsive and effective.
- Ensure rightsholders can see how their input influenced decisions and actions.
- Communicate progress transparently, both to rightsholders and publicly where appropriate.
- Re-enter the due diligence cycle, integrating lessons learned.

Monitor and evaluate

- Monitoring should also support **compliance with relevant legal and regulatory reporting requirements** (e.g. human rights due diligence laws, sustainability reporting standards, internal policies).
- Monitoring data should be:
  - Consistent over time.
  - Disaggregated where relevant (e.g. by stakeholder type, category, location and gender, age and other relevant identity factors).
  - Integrated into broader risk management and governance systems.
- Regularly assess whether actions are addressing identified risks and impacts.
- Gather stakeholder feedback to test the outcome in practice.
- Use indicators to track progress (e.g. changes in complaints, working conditions, access to remedy.

"Access to people on the ground who understand cultural considerations is crucial. In the Dominican Republic, mobile surveys revealed many workers were struggling to meet their end-of-month budgets, which we addressed with financial literacy training. Similar work was done in Kenya, and we connected suppliers from both countries to share knowledge and see how it could be applicable in their context–because one of the worst things you can do in a country is say, "We do it this way, so you must do it the same."

Company representative

Part 2: Step-by-step guidance: the who, the how and the when

Possible key performance indicators (KPIs)
Three levels of indicators track whether engagement was meaningful, influenced decisions, andled to improved outcomes.

Level	Type of indicator	Purpose	Example indicators
Level 1	Process indicators	Track whether and how engagement took place	Number of stakeholders engaged, disaggregated by type and relevant identifiers such as gender, age and migration status. Qualitative feedback on relevance, accessibility, and credibility of the engagement process.
Level 2	Influence indicators	Assess whether engagement influenced decisions and practices	Number of business activities, sourcing practices, policies or projects that were modified as a result of stakeholder engagement. Number of business activities, sourcing practices, policies or projects that were modified as a result of stakeholder engagement. Number of remedies or corrective actions identified and designed in collaboration with engaged rightsholders.
Level 3	Outcome indicators	Track whether engagement improved outcomes for rightsholders	Percentage of engaged rightsholders who report that adverse impacts have been adequately addressed. Number of rightsholders successfully and adequately remediated for harms already suffered. Percentage of gender-specific risks where the likelihood or severity of negative impact has been reduced. Percentage of rightsholders who feel channels for raising grievances are accessible, equitable and effective.

Part 2: Step-by-step guidance: the who, the how and the when

Evaluate Engagement Quality and Outcomes.

Use the data collection and management system tool for MSE to:

Get guidance on what data to capture and how to measure key performance indicators

Assess the quality of engagement processes

Track business influence and responsiveness

Measure what changed as a result of engagement

This supports continuous improvement, accountability and strategic oversight

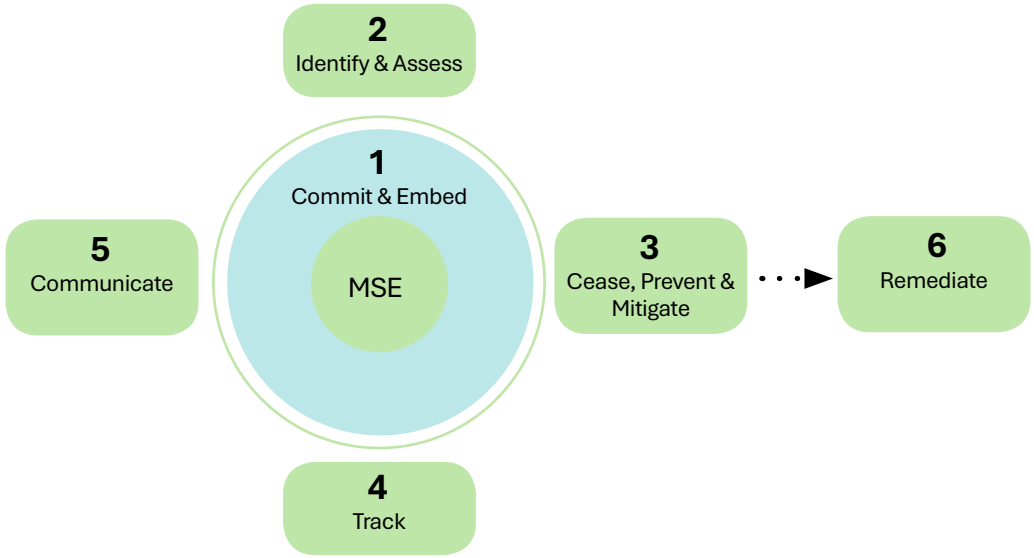
For a practical case study on “Track implementation and results”, please see p. 60

Detail shot of a bucket full of grapes during harvesting in a vineyard in Rawsonville (Roeswater Farm). Photo: Alexa Sedgwick/Oxfam

Part 2: Step-by-step guidance: the who, the how and the when.

When to engage - throughout the HREDD cycle

Meaningful engagement with (affected) stakeholders is essential at every stage of the HREDD cycle. This section outlines opportunities for engagement, who to engage, how to engage, and examples from practice. These are illustrative and should always be adapted to the specific context.



Source: Adapted from OECD Due Diligence Guidance for Responsible Business Conduct (2018)

1. Commit to responsible business conduct and embed HREDD into policies and management systems: Ground policies and management systems in the real experiences and concerns of stakeholders to ensure they are relevant and effective.

2. Identify & assess adverse impacts in operations, supply chains & business relationships: Engage stakeholders to identify actual and potential adverse impacts across operations, supply chains, and business relationships, including risks that may otherwise be overlooked.

3. Cease, Prevent and mitigate adverse impacts: Design and implement responses that are informed by affected stakeholders, helping ensure actions are appropriate, effective, and minimise harm – particularly in sensitive situations.

4. Track implementation and results: Monitor whether actions taken deliver results in practice and are consistent with rightsholders' experiences and expectations, enabling continuous improvement.

5. Communicate how impacts are addressed: Maintain transparent, ongoing dialogue with affected stakeholders, including feedback on how their input informed decisions and actions taken.

6. Provide for remediation or cooperate in remediation efforts when appropriate: Engage rightsholders in the design and operation of grievance mechanisms and remedies to ensure they are accessible, trusted, and responsive to the harm experienced.

1. Commit to responsible business conduct and embed HREDD into policies and management systems

1.1. Establishing management and governance systems, creating or updating overarching human rights / responsible business conduct policies and processes

Who to engage	How - potential engagement tool
• Trade Unions (Global Union Federations (GUFs), international, national, and local). • Employees (including worker representatives). • NGOs, labour rights organisations (LROs) and multi-stakeholder initiatives (MSIs) with specific sectoral, regional, or thematic expertise. **Note:** For high-level policy development, companies are usually not expected to consult directly with affected rightsholders.	Select engagement tool based on the depth and type of input needed. Consider: • Bilateral 1:1 meetings (sensitive or technical issues). • Multi-stakeholder workshops. • Consultations on draft text. • Regular advisory panels.

Practical considerations

- ✓ Engage independent, representative unions where possible. (For more guidance see the annex on trade unions and worker representation).
- ✓ NGOs should be selected based on their expertise on the company's identified salient risk areas, long-standing work with affected workers and communities, independence from the company, and credibility among rightsholders.
- ✓ Priority should be given to organisations with presence in sourcing regions and a track record of supporting worker-led advocacy or grievance processes.
- ✓ Allow sufficient time for planning and ensure participants have enough notice to arrive prepared.
- ✓ Avoid tokenistic engagement – stakeholders should shape outcomes, not simply validate decisions already made.
- ✓ Do not expect stakeholders to provide their time and expertise for free. Respectful and meaningful engagement will likely need to be compensated.
- ✓ Human rights policies should reference or include a stand-alone commitment to the ILO Fundamental Principles and Rights at Work, including Freedom of Association and trade union rights, the UN Guiding Principles for Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

1. Commit to responsible business conduct and embed HREDD into policies and management systems

1.1. Establishing management and governance systems, creating or updating overarching human rights / responsible business conduct policies and processes

In practice

Global Agreements (GFA) to guide management systems

What the companies did

1) Tesco signed a Memorandum of Understanding (MoU) with the International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations IUF). It establishes a collaborative framework to promote and protect workers' rights across Tesco's global food supply chains, with a focus on gender equality.

2) Unilever's MoU and Joint Commitments with IUF and IndustriALL. The MoU establishes a permanent platform to ensure that, across Unilever's global operations, workers can freely exercise their internationally recognised rights, in particular, freedom of association and collective bargaining, without fear of retaliation or discrimination. The Joint Commitment on Sustainable Employment identifies human rights risks linked to non-permanent employment – whether direct or through third parties – including risks to union representation, collective bargaining, equal treatment, social security, and safe working conditions, and sets out a process of ongoing human rights due diligence through engagement with the IUF and IndustriALL.

Lessons learned

Structured dialogue with global trade unions helped Tesco and Unilever embed labour rights into governance frameworks that apply across operations. Formal agreements supported the integration of human rights commitments into policies, contracts and procedures, strengthening consistency, accountability and implementation at scale.

A farmer carefully tends to a young basil seedling. Photo: Bryson Sayuni/Oxfam

1.2. Drafting or updating Supplier Codes of Conduct, purchasing policies, raw material policies and similar

Who to engage	How - potential engagement tool
• Suppliers, local cooperatives, farmers, and fishers. • Industry associations. • NGOs, LROs and MSIs with specific sectoral, regional, or thematic expertise. (for example in responsible purchasing practices). • Certification schemes and standard frameworks (if relevant) (see Q&A Can social audits be considered meaningful rightsholder engagement?).	• In-person meetings / interviews. • Workshops / focus group discussions. For smallholder farmers, fishers and cooperatives, in-person workshops and focus groups are more likely to be meaningful and effective. • Digital surveys or virtual meetings may be appropriate where reliable digital access is available and their use supports inclusive participation without excluding marginalised groups. **"When farmers are geographically spread out, bringing everyone together isn't feasible. Small farm owners can't take a full day off, so processes must be quick and efficient. Informal follow-ups—such as speaking to people at farm shows—can be more effective than formal routes, which don't always work depending on the audience you're trying to reach" Company representative**

Practical considerations

- ✓ Tailor consultation with suppliers, farmers, fishers and local cooperatives to the context, taking into account accessibility barriers such as digital engagement.
- ✓ When planning engagements, consider the seasonality of supply chains and acknowledge that suppliers, farmers, fishers, might have limited time during harvest or fishing season.
- ✓ Engage suppliers early when drafting or updating policies to ensure expectations are realistic and to proactively address trust gaps, capacity constraints, and power imbalances that can otherwise hinder meaningful engagement between producers and buyers.
- ✓ Co-create policies with supply chain partners where possible – do not limit engagement to consulting on a finalised version.
- ✓ Test policy and purchasing procurement requirements against real-world constraints – such as the cost of compliance for small farms or cultural norms around PPE – and explore stakeholder-led solutions.
- ✓ Ask suppliers, farmers, fishers and local cooperatives what support they need to meet the requirements being set out through a Code of Conduct.
- ✓ Provide adequate resources and training to help suppliers understand, apply and implement relevant policies and due diligence requirements.
- ✓ Identify and address any barriers arising from the company's way of doing business that may impede the ability of suppliers and other business relationships to implement RBC policies, such as the company's purchasing practices and commercial incentives.
- ✓ When gathering feedback from suppliers, farmers and fishers, make sure there is a channel to feed responses back.
- ✓ MSIs and other platforms can create space for open, neutral dialogue.

1.2. Drafting or updating Supplier Codes of Conduct, purchasing policies, raw material policies and similar

In practice

Barilla's Carta del Mulino – sustainable soft wheat cultivation through responsible purchasing practices
Barilla launched the **Carta del Mulino (Mill Charter)**[38] to promote sustainable soft wheat cultivation across its supply chain by embedding environmental and social expectations directly into its purchasing practices. The initiative aims to improve soil health and biodiversity, enhance product quality, and reduce environmental impacts, while ensuring economic viability for farmers.

What the company did

- The Charter sets out **10 agronomic rules,** developed through dialogue with mills, storage centres, farmers, WWF Italia, universities, and technical partners. Farmers were actively involved in shaping the requirements, including crop rotation and dedicating **3% of farmland to flowering strips** to support biodiversity. This collaborative process ensured that sustainability requirements were practical, locally appropriate, and aligned with farm-level realities.
- Crucially, Barilla supported **implementation through responsible purchasing practices.** These included long-term supply contracts, financial incentives in the form of price premiums, and full coverage of independent third-party certification costs. By sharing the costs and risks associated with transitioning to more sustainable practices, Barilla enabled farmers to adopt the Charter's requirements without bearing the financial burden alone.
- Mulino Bianco (Barilla) also provides technical and managerial training at farms, warehouses, and mills to support consistent implementation across the supply chain. Compliance with the Charter is verified by an independent third-party control body, reinforcing credibility and accountability.

Lessons learned

- **Partnerships and dialogue:** Multidisciplinary partnerships across the supply chain helped build shared understanding, align expectations, and create a common roadmap for action.
- **Supporting farmers and Responsible Purchasing Practices:** Long-term contracts, technical assistance, and financial incentives were essential to enable farmers to adopt new practices sustainably.

1.3. Drafting or updating targeted policies–such as those affecting Indigenous Peoples, small holder or family farmers or specific groups of workers (women, agency workers, etc)

Who to engage	How - potential engagement tool

• Rightsholders directly affected by the targeted policy (e.g. women workers, Indigenous People).
• Trade Unions (GUFs, international, national, and local).
• Internal employee committees (e.g. women's committees or employee resource groups).
• NGOs, LROs and MSIs with specific sectoral, regional, or thematic expertise.
Note: Direct consultation with rightsholders and their legitimate representatives affected and targeted by the policy should be undertaken.
	• Tools of engagement will vary depending on the type of rightsholder, but ideally the company should combine multiple engagement methods:
	  • Digital surveys if compatible with the accessibility needs of the targeted participants (anonymous or not, depending on the topic).
	  • In-person engagements, tailored to the contextual realities of the targeted participants, this could include focus group discussions and group workshops or 1:1 interviews and meetings with key stakeholders.
	• Where Indigenous Peoples are concerned, determine whether national law recognises collective or territorial rights. Engage through their legitimate representative institutions and align the process with applicable legal frameworks and international standards, including the principle of Free, Prior and Informed Consent (FPIC), as reflected in instruments such as ILO Convention 169 and the UN Declaration on the Rights of Indigenous Peoples.

Practical considerations

- ✓ Respect the principles of meaningful engagement and address participation barriers, such as difficulties in identifying people from specific demographic groups, or ensuring that people with caring responsibilities are not expected to engage outside of regular working hours.
- ✓ If it is important to engage part-time or flexible workers, make sure to facilitate their engagement e.g. setting meetings during working hours.
- ✓ Ensure timing, location, and language are accessible and comfortable for participants.
- ✓ Do not treat the targeted group as a single voice – recognise the diversity within it. For women workers, for example, this could be differences in age, contract type, migration status, race, nationality, or union membership.

1.3. Drafting or updating targeted policies–such as those affecting Indigenous Peoples, small holder or family farmers or specific groups of workers (women, agency workers, etc)

In practice

Addressing GBVH in agricultural supply chains

Women farmworkers face elevated risks of gender-based violence and harassment (GBVH) due to insecure work, hiring and recruitment practices, contractual arrangements, physical isolation, and entrenched gender norms. Traditional interventions have often been insufficient.

- Ethical Trade Initiative and its members launched the GAIA initiative[39] which co-created practical GBVH risk identification and mitigation principles through meaningful engagement with workers, worker representatives, retailers, suppliers, workers, and civil society.
- Existing worker-led structures were strengthened.
- Engagement was iterative, inclusive, and two-way, with multiple rounds of feedback and clear, locally-informed safeguarding protocols.

Key lessons learned

- By centring workers and their representatives, reinforcing existing mechanisms, and maintaining continuous, context-sensitive dialogue, the initiative produced guidance that was legitimate, grounded in reality, and directly usable. Engaging GBVH specialists, trade unions, women's rights organisations and other NGOs brings knowledge and skills that most businesses will not have in-house – particularly in supporting victims and survivors.

Detail shot of grapes during harvesting in a vineyard in Rawsonville (Roeswater Farm). Photo: Alexa Sedgwick/Oxfam

2. Identify & assess adverse impacts in operations, supply chains & business relationshipsand embed HREDD into policies and management systems

2.1. High level saliency assessment, including initial high-level assessment of operations, suppliers and other business relationships

Who to engage	How - potential engagement tool
• Employees (including worker representatives). • Trade Unions (GUFs, international, national, and local). • Community-based organisations and local human rights defenders. • Host governments (national, regional, and local). • Industry associations. • Suppliers, local cooperatives, farmers, and fishers. • Supply chain workers (including worker representatives). • NGOs, labour rights organisations (LROs) and multi-stakeholder initiatives (MSIs). with specific sectoral, regional, or thematic expertise.	Different stakeholders require different engagement approaches. Consider: • Internal meetings for stakeholders including senior leaders, procurement and public affairs. • **Online surveys and questionnaires** might work well for large groups (such as customers, or suppliers with digital literacy). • **Workshops or focus groups** facilitate discussion and the quality of engagement. It can be useful for employees or farmers/small suppliers. • One-to-one interviews, online or in person, can support in-depth dialogue with trade unions, NGO or MSI experts, or investors. • Results from different assessments including social audit data. • Worker voice technology. • Grievance mechanisms.

Practical considerations

Companies can consult different sources to get information on human rights risks, such as:

- ✓ Primary sources (e.g. internal teams and data, government data, census data, impact assessment already carried out by the company or others, social audits, worker voice surveys, grievance mechanisms).
- ✓ Secondary sources (e.g. LROs or NGO reports, media reports, community-based studies).
- ✓ Stakeholders can help triangulate available data from secondary sources (newspapers, reports, databases) and address information gaps where no direct data exists about a specific geography/supply chain tier, etc.

2. Identify & assess adverse impacts in operations, supply chains & business relationshipsand embed HREDD into policies and management systems

2.1. High level saliency assessment, including initial high-level assessment of operations, suppliers and other business relationships

In practice

Improving stakeholder input in a high-level saliency assessment

A company carried out its first high level saliency assessment using an anonymous survey sent to several stakeholder groups. While suppliers engaged actively, participation from business customers and NGOs was limited, resulting in gaps in the identification and assessment of risks.

What the company could have done

- Review the response patterns to identify underrepresented stakeholders and follow up through targeted in-person outreach.
- Clarify the purpose of the assessment and ensure requests reaches someone positioned to respond.
- Complement surveys with short bilateral discussions.
- Build trust before engaging to enable stronger, more meaningful engagement.

Why this works

Tailored, two-way engagement improves the quality and completeness of information, supporting a more accurate and risk-based assessment of impacts.

2.2. In-depth assessments of (high risk) operations or supply chains to identify and address negative impacts (e.g. Human Rights Impact Assessment)

Who to engage	How - potential engagement tool
• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives. • Suppliers, local cooperatives, farmers, and fishers. • Local NGOs or LROs with specific expertise and demonstrated work with rightsholders. • MSIs and other business partners if assessment is done collectively. **Note:** Deep and meaningful engagement with (potentially) impacted rightsholders is key in this step.	• A range of methodologies can be used, as long as they embed the principles of meaningful engagement, for example focus groups, one-to-one interviews, stakeholder roundtables. • Participatory tools can enable more meaningful engagement (e.g. group mapping, storytelling, visual exercise, theatre role playing). • Guidance on how to engage meaningfully in HRIAs can be found in Oxfam's Community-Based HRIA tool: https://hria.oxfam.org/; The Danish Institute for Human Rights Guidance for stakeholder engagement during HRIAs; Shift, Oxfam and Global Compact Network Netherlands Stakeholder engagement Guide 'Making it meaningful'. • Check also Oxfam's guides on Conducting focus groups, Planning survey research, Conducting semi-structured interviews or Fostering Participation in Research.

Practical considerations

- Consider working in partnership with expert NGOs, LROs, trade union federations (such as GUFs) and other stakeholders – particularly where in-depth engagement requires specialist expertise in participatory methods.
- Identify and address barriers to participation in advance (e.g. adapting timing, location, language, or creating safe spaces that enable the participation of women and groups in vulnerable positions).
- Where access is limited (e.g. seasonal or transient workers), seek creative and context-appropriate approaches to engage, including through legitimate representatives, credible proxies, and/or collective engagement.
- Participating in sector-wide risk and impact assessments or contributing to broader country risk profiles developed by industry platforms, can strengthen the publicly available evidence base.
- Be mindful of engagement fatigue and coordinate engagement where possible.
- Collaboration can take many forms: e.g. through MSIs or companies sourcing from the same region can pool efforts to carry out collective engagement activities where appropriate).

2.2. In-depth assessments of (high risk) operations or supply chains to identify and address negative impacts (e.g. Human Rights Impact Assessment)

Practical considerations continued

"Individual companies – particularly buyers – have limited power to drive systemic change in the tea sector. The challenges facing the industry are rooted in long-standing, colonial-era structures that continue to restrict meaningful stakeholder engagement and require industry-wide solutions. These barriers are compounded by limited access to plantation workers and severe time constraints; even when access is granted, brief visits rarely allow the trust-building and deep dialogue needed, despite the presence and support of local NGOs."

NGO representative

In practice

Engaging hard-to-reach workers in a high-risk supply chain

In 2018, Oxfam and S-Group conducted a Human Rights Impact Assessment (HRIA) of S-Group's processed tomato supply chains from southern Italy. The region had been identified as high risk due to unsafe transport, poor housing, and weak health and safety practices. Many workers were undocumented and employed informally, making direct engagement sensitive and risky.

What was done

- Engagement took place during the harvest season and prioritised trust-building.
- Workers were reached through trusted intermediaries, including local trade unions and an International Organization for Migration (IOM) mediator.
- Consultations were held off-site in neutral, safe locations to reduce fear of retaliation (e.g. in union offices and public areas).

Lessons learned

Using trusted intermediaries and safe engagement settings enabled meaningful input from workers in vulnerable positions and supported a more accurate assessment of risks.

2.3 Emergence of new (potential) risks, e.g. when opening new sourcing sites, in evolving situations like conflicts or when the company is made aware of previously unidentified risks (through media, reports, etc)

Who to engage	How - potential engagement tool

• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives.
• Trade Unions (GUFs, international, national, and local).
• Local NGOs, LROs or experts with specific expertise and demonstrated work with rightsholders.
• Suppliers, local cooperatives, farmers, and fishers.
• Conflict Experts, UN Agencies & government authorities.
• MSIs and other business partners if assessment is done collectively.
Note: Meaningful engagement with (potentially) impacted rightsholders and their legitimate representatives is key.
	• Use multiple, cross-checked sources of information:
	  • Rightsholder interviews or focus groups, for example.
	  • Consultation with unions, local NGOs, LROs, UN agencies.
	  • Desk research.
	• A range of methodologies can be used, as long as they embed the principles of meaningful engagement, e.g. focus groups, one-to-one interviews, and stakeholder roundtables.
	• Participatory tools can enable more meaningful engagement, e.g. group mapping, storytelling, visual exercise, theatre role playing.

Practical considerations

- ✓ Consider working with expert NGOs, trade union federations (such as GUFs) and/or MSIs – particularly where several companies are implicated – and other stakeholders to help guide the engagement approach.
- ✓ Define internally what triggers new engagement – entering a new geography or sector, opening or expanding a sourcing site, operating or sourcing in conflict-affected or high-risk areas, or exposure to new allegations through media or NGOs. Internal protocols support a faster, more structured response.
- ✓ Building long-term, proactive partnerships with Global Union Federations, international NGOs and LROs, supports a more efficient response when issues arise in supply chains:

  "Following a crisis that exposed poor labour conditions in South Africa's wine sector, we began working closely with IUF (International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations). That collaboration, initially driven by reputational risk, is now a core part of our due diligence. When we get negative news, the first thing we do is contact IUF to ask if there's a local trade union we can talk to." Company representative

- ✓ Collaborating with other companies sourcing from the same region or supplier can increase impact.
- ✓ MSIs can facilitate engagement through their networks.
- ✓ In conflict-affected areas, companies should apply Heightened Human Rights and Environmental Due Diligence (hHREDD), tailoring rightsholder engagement to volatile and unsafe contexts. Map sourcing regions to identify conflict-affected areas, and use the UNDP guidance, 'Heightened Human Rights Due Diligence for Business in Conflict Affected Contexts'.[40]

2.3. Emergence of new (potential) risks, e.g. when opening new sourcing sites, in evolving situations like conflicts or when the company is made aware of previously unidentified risks (through media, reports, etc)

In practice

Responding to newly identified risks through collective investigation

When companies become aware of previously unidentified or emerging human rights risks, early and structured engagement with credible actors is essential.

What the company did:

In 2023, James Finlay Kenya commissioned an independent investigation led by Partner Africa to assess risks of GBVH and other labour-related HR impacts[41] :

- A multi-stakeholder steering group was established to oversee the process, chaired by the Ethical Trading Initiative (ETI) and including buyers sourcing from the site, local and international NGOs.
- The investigation combined document review, interviews and on-site assessments, supported by safeguarding measures to protect participants.
- Findings informed a detailed, timebound action plan addressing remediation, structural changes and improvements to human rights due diligence systems.
- Workers and community members were engaged in validating findings and shaping new grievance and whistleblowing mechanisms.
- Recognising shared responsibility, buyers committed financial and technical support to the action plan and to reviewing their own due diligence processes.

Lessons learned

Working with credible external experts and engaging workers and communities helped build trust and to strengthen the quality of findings. Collaborating with a women's rights NGO supported a gender-responsive research approach. Multi-company and multi-stakeholder collaboration laid the groundwork for longer-term, sector-wide improvements.

3. Cease, Prevent and mitigate adverse impacts

3.1. Co-designing mitigation and corrective action plans

Who to engage	How - potential engagement tool
• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives. • Suppliers, local cooperatives, farmers, and fishers. • Local NGOs, LROs or experts with specific expertise and demonstrated work with rightsholders. • Local and national government authorities. • MSIs and other business partners in case of collective action.	• Co-design or joint planning workshops. • Facilitated dialogue or problem-solving sessions. • Joint working groups or advisory committees. • Action-planning templates reviewed with rightsholders. • Participatory prioritisation or ranking tools. • Validation sessions to confirm proposed actions.

Practical considerations

- Engage rightsholders, with particular attention to marginalised groups, early when designing mitigation measures – so that actions reflect real needs and lived experience.
- Apply a gender-transformative lens by identifying risks faced by women and ensuring their voices shape solutions.

  “We identified a lack of sanitary facilities as a key risk and worked with our supplier to install new ones. Months later, we realised they weren’t being used. By listening to workers, we learned cultural norms required separate facilities.” Company representative
- Co-design solutions with workers, communities, and their legitimate representatives, rather than finalising plans internally.
- Share draft mitigation plans to allow feedback before decisions are locked in.
- Build trust through open dialogue using regular meetings, safe feedback channels, and transparent communication.
- Assess how sourcing and purchasing practices contribute to impacts and include adjustments to these practices in the action plan.
- Apply safeguarding measures to ensure confidentiality and prevent retaliation, and use Free, Prior and Informed Consent (FPIC) where Indigenous or local community rights are involved.

3. Cease, Prevent and mitigate adverse impacts

3.1. Co-designing mitigation and corrective action plans

In practice

Improving labour conditions through Multi-Stakeholder Collaboration

Seasonal and migrant agricultural workers across multiple commodities face persistent labour risks, including unsafe recruitment practices, weak grievance mechanisms, and limited access to services. These risks are often linked to fragmented supply chains and the exclusion of informal actors from standard due diligence processes.

What the initiative did

Fair Labor Association (FLA) convened the Harvesting the Future programme,[42] bringing together brands, suppliers, labour contractors, farmers, civil society organisations, and public actors. The programme mapped supply chains and conducted field-level risk assessments to identify recruitment and grievance gaps. Workers and communities were engaged early to help define priorities. Historically excluded groups – such as labour contractors, women workers, and young workers – were included through safe, locally led consultations supported by CSOs. Joint dialogue platforms enabled stakeholders to co-design solutions and share knowledge across the initiative.

Lessons learned

- Early worker engagement built ownership of solutions, while collective action and co-investment enabled improvements – such as better housing, education access, and grievance systems – that no single actor could deliver alone.

3.2 Addressing potential and actual harms with stakeholders (implementing action plans)

Who to engage	How - potential engagement tool
• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives. • Suppliers, local cooperatives, farmers, and fishers. • Local NGOs, LROs or experts with specific expertise and demonstrated work with rightsholders local authorities. • Local and national government authorities. • MSIs and other business partners in case of collective action.	• Regular implementation review meetings with rightsholders to adjust plans over time. • One-to-one interviews with affected rightsholders, including women and marginalised groups. • Joint monitoring or oversight committees. • Feedback sessions with community and-or workers on implementation challenges and unintended effects. • Follow-up surveys. • Validation meetings to confirm whether harms are being addressed.

Practical considerations

- ✓ Start small and pilot solutions with one supplier or group of rightsholders, then scale what works.
- ✓ Invest in long-term local partnerships with NGOs, producer groups, and worker organisations.
- ✓ Reinforce existing worker-led structures where they exist.
- ✓ Use iterative dialogues – multiple rounds to review risks, mitigation measures, and effectiveness.
- ✓ Share outcomes of engagement to demonstrate how stakeholder engagement has informed mitigation plans.
- ✓ Use safeguarding protocols – ensuring confidentiality, anonymity, and protection from retaliation, and apply FPIC where Indigenous or local community rights are involved.
- ✓ Consider working with other actors – such as other buyers, local governments, or MSIs – to address shared risks, reduce engagement fatigue, and increase impact.

"Grapes are sourced from Namibia, where workers predominantly live in informal housing. No single supplier has taken responsibility (...) Addressing this situation requires coordinated engagement from all stakeholders, including local government, growers, and retailers, all of whom have a vested interest in improving living conditions for the people residing there."

Company representative

3.2 Addressing potential and actual harms with stakeholders (implementing action plans)

In practice

Addressing potential and actual harms through Stakeholder Engagement

THIRST (The International Roundtable for Sustainable Tea)[43] works to transform the global tea industry by directly engaging stakeholders to identify and address risks and harms.

How THIRST works

- In 2024, THIRST partnered with Kenyan experts to run Tea Community Visioning Workshops with plantation workers, smallholder farmers, and young people across three tea-growing regions. 188 participants joined sessions to share their vision of the future of the tea industry and what actions should be taken to address root causes of human rights impacts.
- Sessions were segmented by group, gender, and age to ensure inclusive engagement and build trust (youth sessions were held in schools, for example).
- Engagement with plantations was essential, though at times challenging, as some owners and managers were reluctant to allow external scrutiny, limiting access to rightsholders. This was overcome through developing relationships and building trust and demonstrating understanding of the challenges producers face.

Lessons learned

- Building trust with employers – grounded in a genuine understanding of their perspectives – is essential preparation for meaningful stakeholder engagement with workers.
- Using local NGOs and consultants with a deep understanding of the culture, language and social dynamics ensures that engagement is meaningful.
- Capturing workshop transcripts provides a rich source of qualitative insight – illustrating the perspectives of participants in ways that statistical surveys cannot.

Rohit Dey Photo: Unsplash

3.3 Responsible exit when disengaging

Who to engage	How - potential engagement tool
• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives. • Suppliers, local cooperatives, farmers, and fishers. • Local NGOs, LROs or experts with specific expertise and demonstrated work with rightsholders. • Local and national government authorities (where relevant). • MSIs and other business partners in case of collective action.	• Direct communication with the supplier – face to face where possible, or via phone or virtual meetings. Allow sufficient time for detailed discussion and schedule follow-up meetings to enable the supplier to gather information and assess risks. • Employ worker-centred and on-site engagement where appropriate, such as focus groups or one-to-one interviews with affected workers, including women, migrant workers, informal workers, and marginalised groups, and their legitimate representatives.

Practical considerations

- Communicate with the supplier as early as possible when disengagement becomes a possibility, explaining the reasons clearly and allowing sufficient time to address concerns before a final decision is made. Open and timely communication allows both parties to understand potential impacts and begin identifying mitigation measures.
- Questions to explore with suppliers are: **How would disengagement affect the business? What short-term and long-term impacts might occur for workers and local communities?**
- Engage rightsholders – including workers, trade unions, local communities, and Indigenous Peoples – to inform risk assessments and the disengagement process.
- Prioritise those in vulnerable positions, such as migrants, women and informal workers. Where the risk of adverse impacts is low, involvement in every discussion may be unnecessarily disruptive.
- Where high risks exist, engage rightsholders early and before a final decision to disengage, ensuring their experiences and priorities shape the design of mitigation or remediation actions, and any exit plan.
- Questions to explore with rightsholders once you understand there is a significant risk to business continuity: **How will the impact on the business affect livelihoods? What risks may increase after exit? What support or remediation is needed?**
- Use safeguarding protocols – ensuring confidentiality, anonymity, and protection from retaliation, and apply FPIC where Indigenous or local community rights are involved.
- Design an exit plan that integrates rightsholder input — for example by planning a phased exit, extending notice periods to avoid sudden layoffs, and supporting job placement or retraining.
- When disengaging from a supplier, partner, or stakeholder, consider legal and contractual obligations, potential financial and operational impacts, and the effects on stakeholders. Plan the exit responsibly to avoid creating harm, including providing adequate notice, fulfilling outstanding obligations, and supporting affected stakeholders where feasible.
  For more guidance see Technical Guidance on Responsible Disengagement from the Ethical Trading Initiative [44]

3.3 Responsible exit when disengaging

In practice

Addressing serious human rights risks through responsible engagement, backed by credible prospect of collective disengagement

The Fair Food Program (FFP)[45] is a worker-driven, market-enforced model of social responsibility pioneered by the Coalition of Immokalee Workers (CIW), with participating agrifood buyers and growers, and independently monitored by the Fair Food Standards Council (FFSC).

The model is grounded in the principle that effective supplier engagement must be backed by the credible prospect of disengagement.

How the model works

- Binding agreements between the CIW and participating buyers require buyers to preferentially source from compliant growers and to collectively suspend purchases from growers found in serious violation of the program's worker-informed Code of Conduct.
- Violations are identified primarily through worker-centred mechanisms, while the program's dedicated monitor, the Fair Food Standards Council (FFSC), investigates and determines non-compliance, ensuring credibility and separation from commercial interests.
- Immediate protections are put in place for workers where serious harm or retaliation risks exist, while sourcing continues to maintain worker access to program protections and to avoid unnecessary economic harm to workers and growers alike.
- Non-compliant suppliers must implement time-bound corrective action plans, including remediation for affected workers.
- Disengagement is used only as a last resort, triggered when suppliers engage in zero tolerance violations or repeatedly refuse to cooperate.
- Buyer disengagement is rule-based and collective, requiring suspension of purchases until a mandatory suspension period is completed and a re-entry audit confirms that compliance is restored.

Lessons learned

- While effective collaboration with suppliers is the norm, rule-based and collective disengagement provides a real market incentive for participating growers to abide by fair labour practices and has contributed to the elimination of zero-tolerance abuses, such as forced and child labour.

4. Track implementation and results

4.1. System-level tracking of the overall HREDD process

Who to engage	How - potential engagement tool
• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives. • Suppliers, local cooperatives, farmers, and fishers. • NGOs. LROs and MSIs with specific sectoral, regional, or thematic expertise.	• Surveys to gather stakeholders' feedback on policies, practices, and engagement processes. • Interviews or focus groups to assess the quality and credibility of engagement and grievance handling. • Participatory mapping or visual tools to identify systemic gaps, recurring risks, or blind spots. • Digital platforms or online feedback channels for ongoing, low-barrier input on due diligence processes.

Practical considerations

- ✓ Purpose is to assess the effectiveness of policies, practices, engagement processes, and grievance outcomes at an aggregated level and whether the due diligence system as a whole is working.
- ✓ Consult rightsholders at regular intervals to assess whether actions are on track, identify emerging risks, and flag where corrective action to the overall HREDD approach may be needed.
- ✓ Maintain a continuous feedback loop for rightsholders to highlight gaps in the HREDD process and suggest improvements to risk identification and tracking approaches.
- ✓ Revise policies and due diligence processes based on feedback and lessons learned from tracking and engagement.
- ✓ Protect participants' safety, confidentiality, and privacy, especially in high-risk contexts.
- ✓ Keep internal records of MSE activity – these provide a data set that can be reviewed and analysed to establish what has worked, who was involved and what the outcomes were.

4. Track implementation and results

4.1. System-level tracking of the overall HREDD process

In practice

System-level tracking through mobile worker engagement across multiple countries

Minor Weir Willis (MWW) sought to strengthen system-level tracking of its due diligence processes by gathering direct worker insights on human rights risks and working conditions across high-risk regions. The approach aimed to complement existing grievance mechanisms while protecting worker confidentiality and enabling participation in contexts where traditional channels may be inaccessible or ineffective.

What the company did

- MWW partnered with &Wider, a mobile-based survey platform, to engage workers anonymously across multiple countries. Surveys were deployed using a risk-based approach, allowing MWW to prioritise higher-risk geographies and track patterns and trends across its supply chain over time.
- Worker participation was promoted through workplace posters and manager encouragement, carefully designed to raise awareness without compromising anonymity or creating pressure to participate. The mobile format enabled workers to share feedback safely and at scale, providing real-time data to support ongoing due diligence.
- The survey findings offered visibility into issues that may not have surfaced through standard grievance mechanisms. They also informed targeted engagement with suppliers, enabling MWW to identify practical solutions and draw on lessons from across its supply chain. This approach supported continuous improvement by linking worker feedback directly to follow-up actions and corrective measures.

Lessons learned

- Worker participation through mobile surveys can provide effective system-level insight into HREDD performance across countries and suppliers.
- Worker trust – in both the tool and the company's response process – is critical and must be earned over time through consistency and a demonstrable commitment to acting on feedback.

4.2 Impact-level tracking specific action plans, initiatives or pilot projects

Who to engage	How - potential engagement tool

• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives linked to the action, initiative, or project.
• Suppliers, local cooperatives, farmers, and fishers linked to the action, initiative, or project.
• Other stakeholders involved in the action or project. This can include, among others:
  • NGOs, LROs and MSIs with specific sectoral, regional, or thematic expertise.
  • Local and national government authorities (where relevant).
	• Tracking methods chosen by rightsholder and agreed upon at the start of implementation.
	• Informal feedback sessions or check-ins with impacted rightsholders.
	• Short, targeted surveys linked to specific actions or pilots.
	• Participatory or visual tools to track changes over time at the local level.

Practical considerations

- Engage rightsholders on an ongoing basis to assess whether specific initiatives, pilots, or mitigation measures are being implemented as intended and are effective in practice.
- Involve rightsholders in validating findings related to specific actions or pilots, including whether impacts have been addressed, reduced, or prevented, and whether unintended effects have emerged.
- Where community-based mechanisms exist, draw on them for ongoing, contextual information on whether issues are resolved, ongoing, or newly emerging.
- Adapt specific mitigation measures or pilots based on rightsholder feedback, with changes communicated back to affected groups.
- Include tailored safeguarding measures in engagement related to specific initiatives, particularly where risks of retaliation or harm are elevated.
- **See page 41 for possible indicators to track MSE performance across three levels, and the annexed data collection and management tool for MSE for guidance on collecting, analysing, storing, and using data before, during, and after engagement.**

4.2 Impact-level tracking specific action plans, initiatives or pilot projects

In practice

Worker voice pilot in shrimp aquaculture supply chains, India

Kroger and Lidl GB identified potential human rights risks in its shrimp aquaculture supply chains in India and sought to strengthen worker voice and remedial mechanisms beyond traditional social compliance monitoring.

What the company did

- As part of its Human Rights Impact Assessment (HRIA) Action Plan, Kroger implemented a Worker Voice Pilot supported by structured monitoring and reporting mechanisms.[46]
- An independent helpline allowed workers to report concerns confidentially.
- Calls were categorised, remediation tracked, and anonymised data aggregated to identify trends, engage suppliers, and inform corrective actions.

Lessons learned

- Trust-building requires time and affects data quality: The pilot was extended twice to allow additional time for engagement of workers and managers to ensure they understand the helpline, workers' rights, and reportable concerns – demonstrating that meaningful worker voice data emerges gradually.
- Interpreting worker voice data requires context: during the pilot, many calls were made for training or practice. This high level of engagement demonstrated the workforce's interest and the importance of establishing a safe environment before call volume can be used as a reliable indicator of underlying risk.
- Structured, iterative engagement strengthened worker voice, awareness, and remediation effectiveness.

5. Communicate how impacts are addressed

5.1. When publishing assessments, action plans, or policies relevant to stakeholders

Who to engage	How - potential engagement tool

• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives.
• Other stakeholders who have participated in the consultation or may be impacted by the intended published documentation (assessments, action plans, policies etc). This can include, among others:
  • NGOs, labour rights organisations (LROs) and multi-stakeholder initiatives (MSIs) with specific sectoral, regional, or thematic expertise.
  • Suppliers, local cooperatives, farmers, and fishers.
  • Business partners.
  • Local and national government authorities (where relevant).
	• Sustainability and/or annual reports.
	• Public reports or summaries (printed or digital).
	• Policy briefs or plain-language summaries.
	• Posters or visual materials in local languages.
	• Company websites or dedicated portals.
	• Social media or digital communication channels.
	• Email notifications or newsletters.
	• Community notice boards.
	• Webinars or information sessions.
	• Structured dialogue with affected communities e.g. facilitated by a third party or trade union.
	• In person community engagement sessions.

Practical considerations

- ✓ Be clear about the intention to communicate and publish documentation during the consultation phase.
- ✓ Be transparent on whether any insights shared during the engagement process will be shared publicly, and if so, give stakeholders the opportunity to review relevant content before publication.
- ✓ Share information and results in clear, accessible language. Provide transparent, aggregated monitoring findings validated with rightsholders, explaining how their input has informed adjustments to policies, processes and priorities.
- ✓ Use multiple channels to reach all relevant rightsholders (online, printed, in-person).
- ✓ Provide summaries or visual aids for complex content to ensure comprehension.
- ✓ Explain how rightsholders can provide feedback or raise questions.
- ✓ Ensure materials are accessible and understandable to stakeholders by considering local languages, cultural context, geographic accessibility, and inclusive formats .

5. Communicate how impacts are addressed

5.1. When publishing assessments, action plans, or policies relevant to stakeholders

In practice

Publishing HRIA findings and action plans in agri-food supply chains

Publication of a HRIA report and the action plan is considered good practice. In the agrifood sector, several companies have published the results of their research as well as their action plans and recommendations on their websites.

What the company did

- Pilgrim's UK, together with its retail partners Waitrose and Co-op, conducted a human rights impact assessment (HRIA) of its integrated pork and lamb supply chains.
- The companies published the findings, a joint Human Rights Action Plan as well as updates on progress.[47]
- Several other companies have also held online consultation sessions with stakeholders to present the plan, gather feedback, and enable co-ownership of next steps.

Lessons learned

- Public disclosure and structured dialogue reinforce accountability, shared responsibility, and stakeholder trust.

Thibault Lam Tran Photo: Unsplash

5.2 During implementation of action plans, projects, or grievance processes and at the conclusion of actions, projects, or grievance processes

Who to engage	How - potential engagement tool

• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives.
• Other stakeholders who are involved, affected or impacted by the initiative. This can include, among others:
  • NGOs, LROs and MSIs with specific sectoral, regional, or thematic expertise.
  • Suppliers, local cooperatives, farmers, and fishers.
  • Business partners.
  • Local and national government authorities (where relevant).
	• Progress-tracking tools or dashboards shared with relevant stakeholders.
	• Workplace meetings.
	• Community noticeboards.
	• SMS and digital engagement tools.
	• Sustainability and/or annual reports.
	• Information on the company's website.
	• Pamphlet using illustrations, graphics, and plain language circulated in communities and in workplaces.
	• Workshops facilitated by local civil society or trade unions.

Practical considerations

- ✓ Share short, periodic updates explaining what actions are underway, what has changed, and what is still in progress.
- ✓ Use accessible channels familiar to targeted stakeholders and rightsholders
- ✓ At the conclusion of the actions or projects, close the feedback loop by communicating outcomes, remedies delivered, and remaining steps
- ✓ Explain what was decided, what changed, and why. Provide an opportunity for rightsholders to respond or raise remaining concerns

5.2 During implementation of action plans, projects, or grievance processes and at the conclusion of actions, projects, or grievance processes

In practice

Collaborative human rights action in Thailand's fishing and seafood sector

Workers in Thailand's fishing and seafood sector face unfair wages, poor working conditions, and the withholding of identity documents.[48]

What the stakeholders are doing

- Oxfam, Raks Thai Foundation, and Stella Maris Seafarers Centers convened a collaborative initiative bringing together workers, local processing companies, global buyers, and public actors.
- Workers were engaged through focus groups, surveys, and interviews to identify priority issues and propose solutions, including tailored engagement strategies for Myanmar and Cambodian migrant workers.
- Building on worker-identified solutions, global buyers and local actors – including processing facilities and vessel owners – co-developed an action plan to address root causes and ensure shared responsibility.

Lessons learned

- Worker-led problem identification ensured that action plans were grounded in workers lived experiences, with proposed solutions addressing real harms and viewed as legitimate by the workers. Regular dialogue and engagement strategies allowed workers to shape solutions in different stages of the process, not just during assessments. Collaboration among civil society, companies, and workers enabled coordinated engagement on systemic risks that no single actor could address alone.

6. Provide for remediation or cooperate in remediation efforts when appropriate

6.1 Designing and setting up operational-level grievance mechanisms aligned with the UNGPs' effectiveness criteria

Who to engage

- Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives.
- Local NGOs, LROs or experts with specific expertise and demonstrated work with rightsholders.
- Suppliers, local cooperatives, farmers, and fishers.
- Other business partners when designing collective operational-level grievance mechanisms.
- Experts with experience designing operational-level grievance mechanisms.

How - potential engagement tool

- Short consultations or focus groups with rightsholders.
- Participatory mapping and visual tools.
- Co-design workshops for procedures and communication materials.
- Piloting entry points with rightsholders.
- Role-playing or mock complaints.
- Third-party or independent verification processes.
- Iterative adjustment workshops to revise mechanisms.
- Co-designed outreach materials (posters, leaflets, SMS, online).

Tools to receive grievances

- Potential grievance channels:
  - Forms (paper or digital), personal or anonymous.
  - Hotlines or phone reporting channels.
  - Email or online submission portals.
- In-person reporting at offices or community centres, or through trusted intermediaries and third-party reporting mechanisms.
- Secure databases for grievance documentation.

See the Grievance mechanisms toolkit developed by the Oxfam Advisory Service for Reckitt.

Practical considerations

- ✓ Review the site's industrial relations and people management processes and procedures. This includes the local legislation governing workplace complaints, and the trade union's role in collective grievances, appeals, and arbitration processes.
- ✓ Establish clear roles and safeguards within complaint-handling processes, including a designated grievance officer, gender-balanced teams, conflict-of-interest protections, defined escalation routes, and mandatory timelines for responding and resolving cases.
- ✓ Engage affected rightsholders and relevant stakeholders from the start to ensure mechanisms are accessible, legitimate, culturally appropriate, and safe.
- ✓ Review the site's industrial relations and people management processes and procedures. This includes the local legislation governing workplace complaints, and the trade union's role in collective grievances, appeals, and arbitration processes.
- ✓ Collect feedback on preferred complaint channels, barriers to access, and design features.

6. Provide for remediation or cooperate in remediation efforts when appropriate

6.1 Designing and setting up operational-level grievance mechanisms aligned with the UNGPs' effectiveness criteria

Practical considerations (continued)

- Use clear, jargon-free questions such as: **Would you feel comfortable raising a problem with this company? If you had a problem, how would you want to raise it? Talking to someone in person? Calling or sending a message? Writing it down? Asking someone else to speak for you? Are there times or places where it would be hard for you to raise a concern? Who should not be involved in handling complaints because it could cause problems or pressure?**
- Provide multiple, accessible grievance channels – anonymous, oral, written, digital, in-person – so rightsholders can choose the safest, most comfortable entry point.
- Pilot small-scale processes to test usability and demonstrate commitment.
- Revise procedures and outreach materials based on feedback.
- Ensure inclusivity for women, gender-diverse people, and marginalised groups.
- Ensure safeguards for gender-based violence (GBV) complaints including trained personnel, and referral pathways – including psychosocial, medical, and legal support – to ensure survivor-centred, rights-compatible responses.
- Train all actors involved in handling the grievance procedure, including grievance officers, managers, security personnel, human resources staff, and third-party contractors who may receive complaints.
- Engage with existing community-level grievance structures – such as local committees, trusted community leaders, or liaison roles – to understand how rightsholders currently raise concerns and to ensure alignment, accessibility, and safe referral pathways between company-level and community-level mechanisms.

Note: In many cases, affected workers or communities interact with several companies through shared suppliers, contractors, or sites. Collaborating on shared grievance mechanisms – which are designed to be rights-compatible and aligned with the UNGPs' effectiveness criteria – can improve accessibility and trust, while also reducing duplication and confusion.

6. Provide for remediation or cooperate in remediation efforts when appropriate

6.1 Designing and setting up operational-level grievance mechanisms aligned with the UNGPs' effectiveness criteria

In practice

Designing an operational-level grievance mechanism in Colombia

A mid-sized sugarcane processing company in Colombia wanted to establish an operational-level grievance mechanism aligned with UNGP effectiveness criteria. Ensuring accessibility and trust among local Indigenous communities, workers, and other rightsholders was a key challenge.

What the company did

- The company engaged directly with local Indigenous communities, workers, and representatives from local NGOs during the design phase.
- They piloted multiple entry points, including in-person reporting at the farm, phone lines, and a digital anonymous platform.
- Rightsholders reviewed draft procedures and communication materials.
- The company adapted the mechanism iteratively based on feedback.

Lessons learned

- Early and inclusive engagement ensured mechanisms are legitimate and culturally appropriate. Piloting multiple channels helped identify practical barriers and increased accessibility, while co-designed communications and iterative feedback strengthened trust and accessibility. Focusing on gender and marginalised groups was critical to equitable access.

6.2 Receiving, assessing and addressing grievances

Who to engage	How - potential engagement tool
• Rightsholders and stakeholders, including affected workers and their unions (local, national, international, GUFs), community members and Indigenous People, and their legitimate representatives. • NGOs, LROs or other actors representing rightsholders if grievance was filed by them (including legal representatives). • Relevant suppliers, local cooperatives, farmers, and fishers or business partners.	• Confidential meetings or interviews with affected rightsholders. • Confidential meeting with representative of rights holders. • Joint meetings with different stakeholders and rightsholders. • Mediation or facilitated resolution meetings. • Satisfaction surveys or feedback forms. • Community-based monitoring mechanisms. • Third-party or independent verification processes. • Grievance closure protocols with rightsholder confirmation.

Practical considerations

- ✓ Acknowledge all grievances receipt promptly whether received directly or through a third party – in a language and format the complainant understands.
- ✓ Explain the process, timelines, and next steps—including how decisions will be made.
- ✓ Set realistic expectations on possible outcomes.
- ✓ Use plain language rather than technical or legal terminology.
- ✓ Be alert to risks of re-traumatisation and avoid repeated or unnecessary questioning.
- ✓ Offer choices about how and when information is shared, including whether support persons or representatives are present.
- ✓ Avoid behaviours that reinforce power imbalances, such as dismissiveness, impatience, or defensiveness.
- ✓ Do not place undue burdens of proof on rightsholders, particularly where information asymmetries exist.
- ✓ Ask rightsholders what outcomes they prioritise (e.g. apology, restitution, compensation, rehabilitation, guarantees of non-repetition, or other forms of remedy).
- ✓ Present multiple remedial options rather than a single pre-determined solution.
- ✓ Recognise that what is “adequate” can differ across individuals, communities, and cultural contexts.
- ✓ For harms affecting groups or communities, engage representatives while safeguarding minority voices.
- ✓ Link individual remedies to broader corrective actions to prevent recurrence.
- ✓ Keep rightsholders informed about how remedies are being implemented and what steps remain. Provide accessible updates in appropriate languages and formats.
- ✓ Ask for feedback from rightsholders on whether proposed remedies are acceptable and feasible. Adjust remedies where appropriate based on this feedback.
- ✓ Document and communicate outcomes, explaining how grievances have been addressed and remedies implemented, without breaching confidentiality.

6.2 Receiving, assessing and addressing grievances

In practice

Addressing excessive working hours through union engagement.

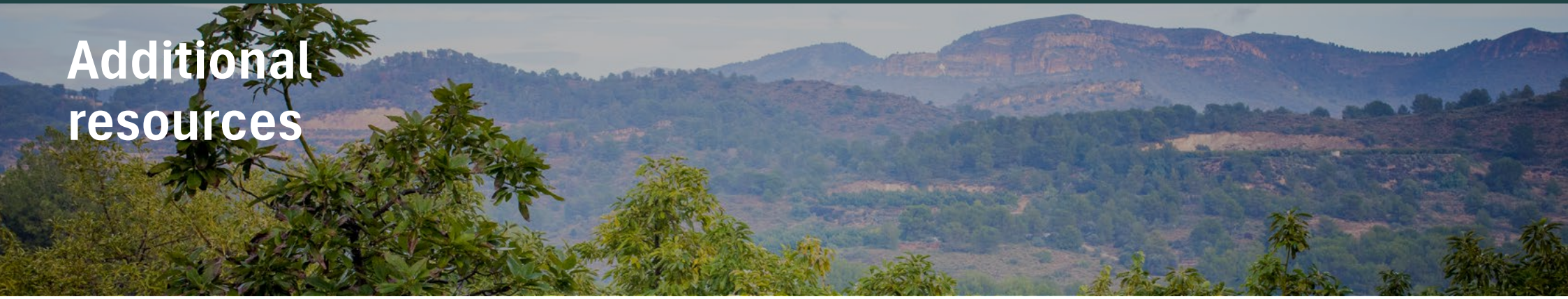
A regional fresh-produce buyer received a complaint from a trade union about excessive working hours at a contracted vegetable farm.

What the company did

- The buyer collaborated closely with the union to conduct confidential interviews with affected workers, focusing on hours worked, health impacts, and workers' expectations.
- Findings were shared with the union, which remained engaged throughout discussions with the supplier.
- A joint corrective action plan was designed, together with the buyer, the farmer and the union with measures that included:
  - Introducing a formal working-time recording system.
  - Adjust buyer orders to reduce supplier's reliance on overtime.
  - Enabling the union to carry out ongoing assessments of working hours and related health impacts, supported by worker interviews.
- Working hours decreased overall, but during peak periods some teams continued to exceed legal limits due to labour shortages and production pressures the new time-recording system improved visibility of hours, though inconsistent use initially limited its effectiveness.
- The union raised these gaps and helped adjust corrective actions, which were extended into the following season.

Lessons learned

- Ongoing engagement with the union enhanced legitimacy and built worker trust. Trade union involvement enabled safe participation, reduced the risk of retaliation, and strengthened follow-up – supporting sustainable improvements in working conditions. Although full compliance was not achieved immediately, continued union involvement helped prevent backsliding and supported ongoing improvements.



Additional resources

The additional resources are provided in separate documents. In these you will find:

Tools		
1	**Guiding questions for MSE principles ("what good looks like")**	This tool helps companies follow the principles outlined in the introduction to the main guidance.
2	**Stakeholder mapping tool for MSE in the agriculture and food sector**	The tool guides companies through a systematic mapping exercise and the development of a stakeholder mapping dashboard that provides a clear overview of affected groups, risk exposure and engagement priorities, and serves as a foundational building block for meaningful, ongoing stakeholder engagement.
3	**Data collection and management system tool for MSE in the agriculture and food manufacturing sector**	This tool enables companies to systematically collect, analyse, store, and use data before, during, and after engagement in order to: • Ensure quality and inclusiveness of engagement processes. • Track business influence and responsiveness. • Monitor tangible outcomes and impact for rightsholders. • Enable strategic oversight, accountability, and continuous improvement.
Knowledge		
1	**Q&A**	This Q&A contains answers to frequently asked questions on meaningful stakeholder engagement in the agricultural and food manufacturing sector.
2	**List of tools for engagement – their benefits and limitations**	This resource provides a non-exhaustive list of engagement tools, along with their benefits and limitations, which you can use as guidance for choosing the suitable tool(s) for engagement.
3	**The role of trade unions and worker representation**	This resource gives a short overview of trade unions and worker representation and what they mean for MSE.

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