



SUSTAINABLE
LINKS

Practitioners' Workshop: How to improve grievance management in the tourism value chain

Sustainable Links – Koalick & Remmert GbR

10 November 2022

www.sustainable-links.de



- We create sustainable links between people, processes and topics – within businesses and along their value chain
- We partner with you to embed proactive due diligence within your company and value chain, build internal capabilities and engage stakeholders



We create an understanding of the opportunities and challenges of human rights due diligence



We analyze human rights risks and actual impacts



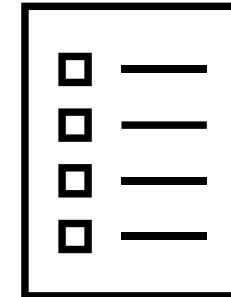
We empower you and your stakeholders to actively embed human rights and social sustainability



We implement projects that bring due diligence to life

Agenda for today

When	What
10:00 – 10:20	Welcome & introductions
10:20 – 11:00	Setting the scene: Overview of findings on grievance mechanisms in the tourism sector
11:00 – 11:45	Improving grievance mechanism effectiveness: Effectiveness criteria in action
11:45 – 12:00	Coffee break
12:00 – 12:20	Debriefing the exercise
12:20 – 13:00	The way forward: What do we need to move ahead? Supporting role by the Roundtable



Check - in

Your name and role

What are you hoping to get out of today's workshop?

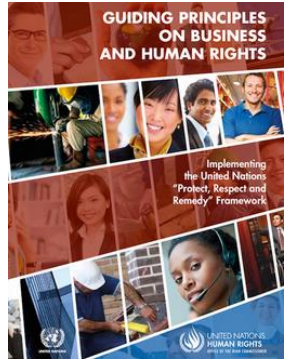
For your organization, what is the single biggest challenge in relation to grievance mechanisms in your value chain?

Introduction

What are grievance mechanisms and why are they important?



The business responsibility on grievance & remedy



Companies are expected to...

...assume a forward looking responsibility to **prevent** human rights impacts

... assume a backward looking responsibility to **address** human rights impacts

... by establishing and maintaining effective, operational-level GM's, or participating in these.

GM = a tool to **identify**

GM = a tool to **mitigate & remedy**

"Cause"

"Contribute"

„Directly linked"

provide for or cooperate in their remediation through legitimate processes

use **leverage** to mitigate the impact

The wider context of operational-level GM's

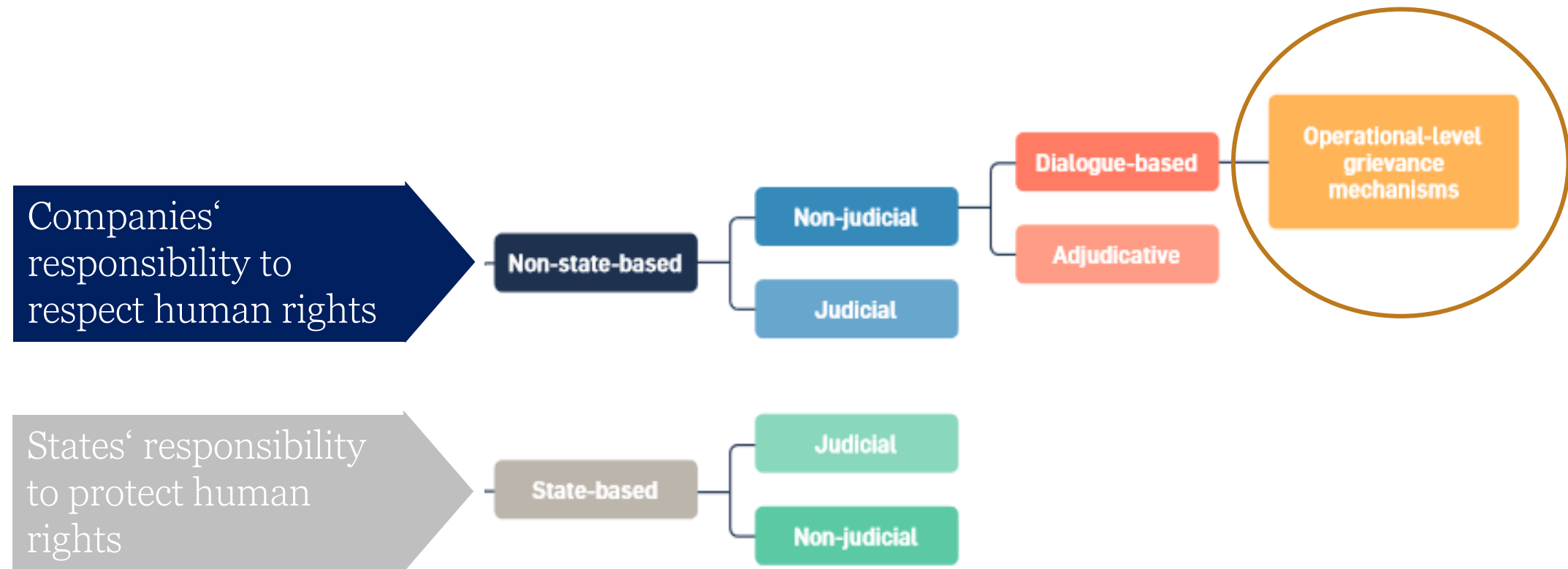


Illustration adapted from [DGCN](#), 2014

Benefits of good grievance mechanisms

Early warning
systems

Early
resolution of
disputes

Proactive due
diligence

Relationship
building

Fostering a
learning
culture

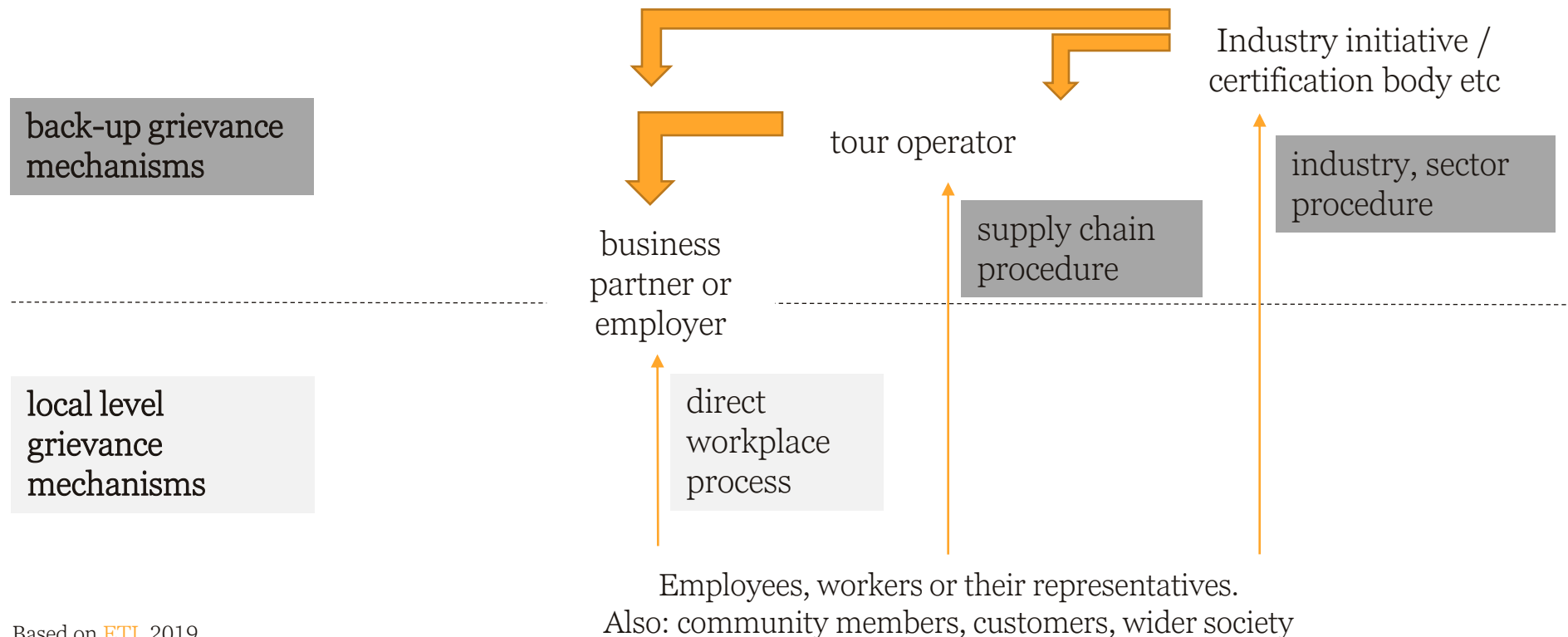
Preparedness
for increasing
legislation

Resource
saving

Integration

Approaches for operational-level GM

Different levels of accountability



Based on [ETI](#), 2019

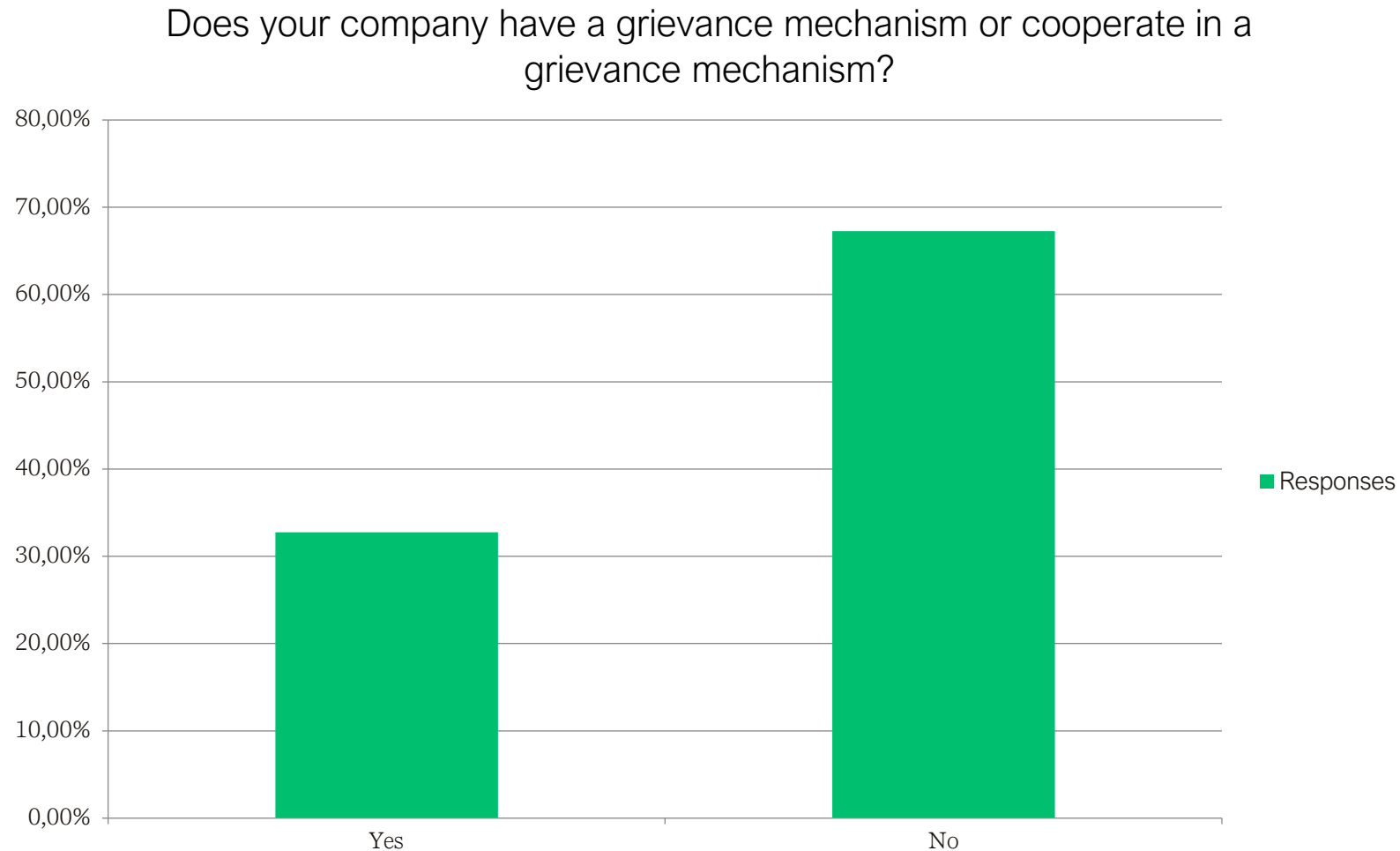
Our research project with the Roundtable



Aim: Understand status quo and assess potential pathways toward establishing joint grievance mechanisms in tourism destination countries

Grievance mechanisms in tourism

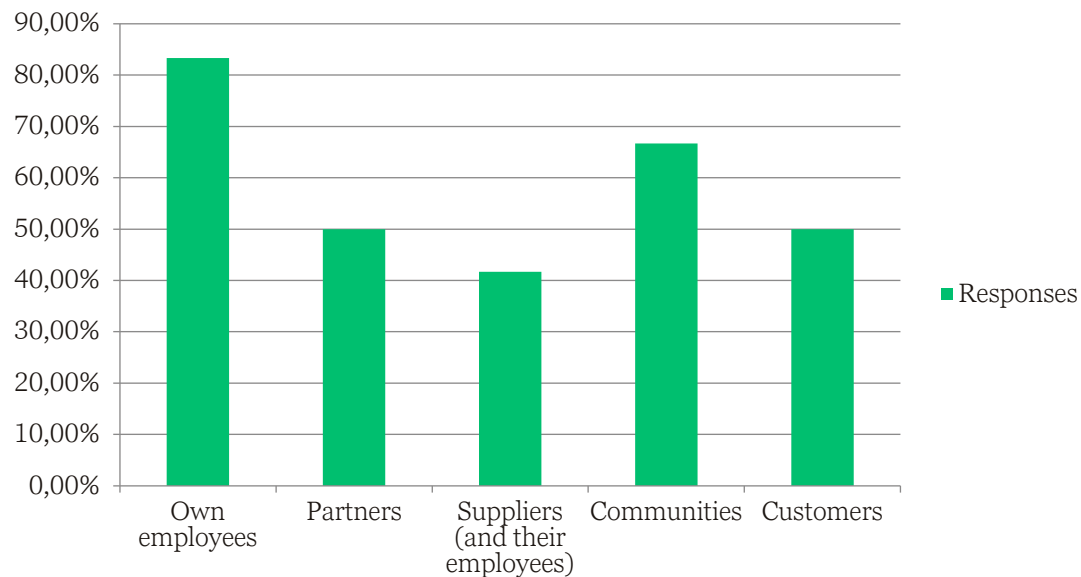
– selected survey results



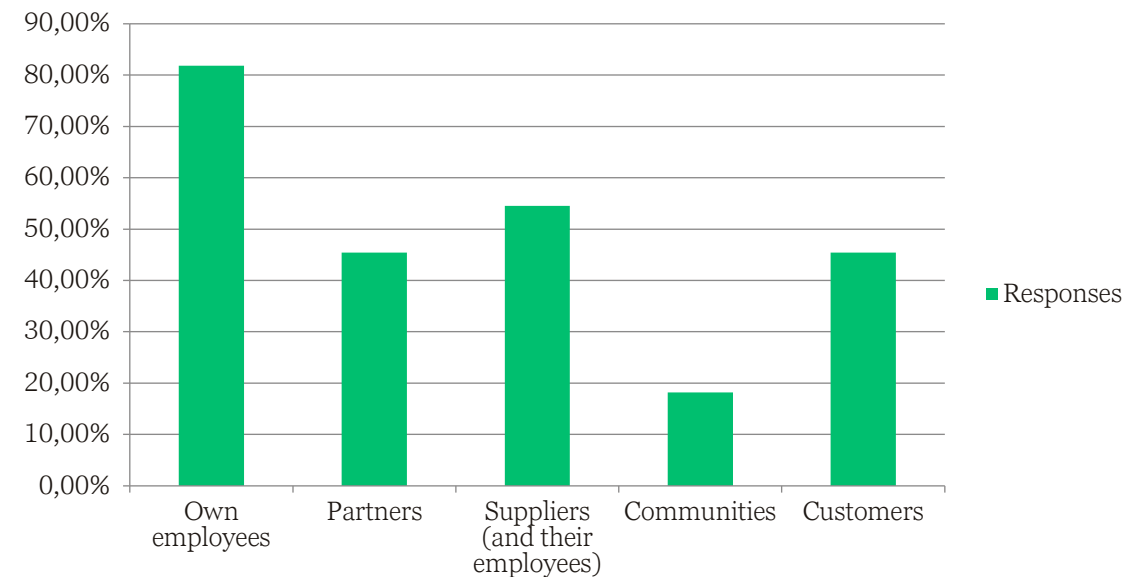
Grievance mechanisms in tourism

– selected survey results

To whom is your / are your grievance mechanisms accessible?



To whom do you proactively communicate your grievance mechanism(s)?



Grievance mechanisms in tourism

– selected survey results

Biggest challenges to effective mechanisms

Accessibility
and promotion

Anonymity

Systemic sector
issues

Attitude /
culture in sector

Local authorities
capacity /
compliance

Resources and
administrative
effort

Grievance mechanisms in tourism – Status quo

- strong focus on **children's rights**, but unclear effectiveness of mechanisms
- existing **generic complaints mechanisms** not accessible to/used by affected rightsholders
- clear **separation** of procedures: internal and external target groups
- double **role of customer** in grievances
- GM thinking **does not include communities or deeper value chain**
- role & capacity of **local guides** varies, but large potential
- lack of **collaboration along the supply chain**/with local DMC's, competitors & hotels
- Very few **large hotels work with trade unions**, opening up to complaints via GFA's

Grievance mechanisms in tourism

– Environment in destination countries

- **accountability and collaboration gap** – DMC's and hotels not cooperating with TO's on due diligence; power and leverage issues
- TO lack understanding of / relationships to **vulnerable groups** & their representatives
- environment & network of **potential partners** differs hugely per country context, target group and topic
- weak political governance structures make **collaboration with governments** (and supporters) difficult, yet they are crucial to engage
- reluctance to engagement with **trade unions** / unionisation in the sector
- unawareness of tourism overlap with other sectors and **potentials to collaborate**

What works

Good practice examples



Good practice in tourism/hotels

Own operations/supply chain, United Kingdom

Shiva Hotels Modern Slavery Incident Reporting



- designed to report, investigate and remedy (suspicions of) modern slavery and human trafficking
- anti-trafficking protocol laying out roles and responsibilities
- victim-centred procedures to prioritise their safety and wellbeing at all times
- covers hotel usage as well as (labour) supply chain
- encourages own staff as well as external parties to report suspicions
- procedure deeply embedded in organisation
- sharing learning from grievances with other SME in the sector

Key strengths:

- **legitimacy and rightsholder orientation:** close collaboration with local civil society
- topic focus allows for **clear and accessible** layout of incident reporting
- regular **learning** and analysis

<https://www.shiva.co.uk/modernslavery>

Good practice in tourism

Tourism Industry Initiative

Nicht Wegsehen / Don't Look Away

- Collaboration between civil society and children's rights expert ecpat and governmental/law enforcement institution BKA
- Educating tourists about risks of child abuse in tourism
- Offering two pathways to report issues, depending on perceived nature/severity of observation
- Initially operational in German speaking countries, later rolled out in further countries, incl. collaboration with respective law enforcement organisations



Key strengths:

- **formalised collaboration** with governmental actors with clear distribution of responsibility
- clearly **defined topic scope** helps promotion of the channel

Good practice in logistics

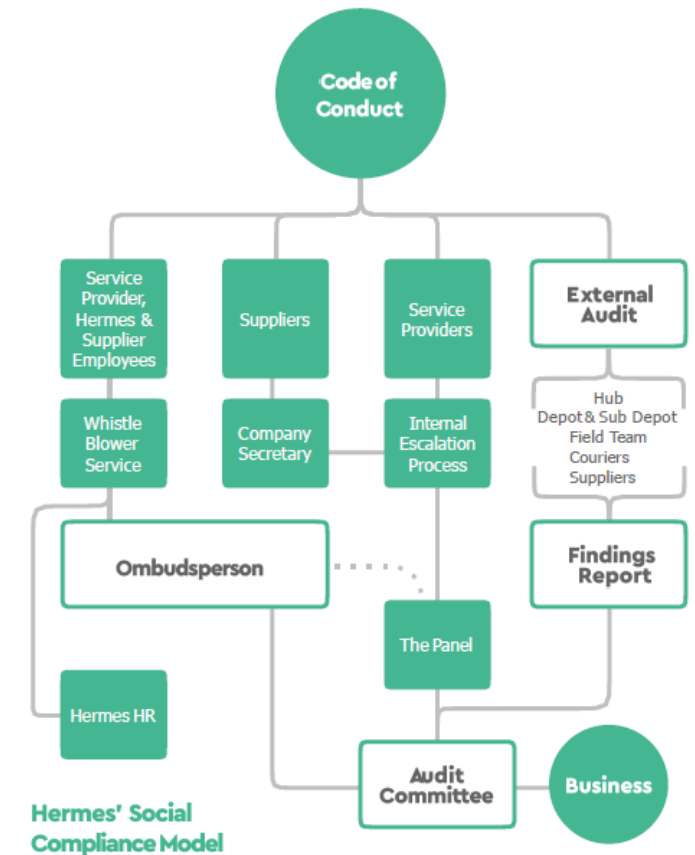
Logistics, Globally

Grievance system for couriers

- Focus group discussions with couriers
- Independent Complaints Panel can be reached through third party hotline or internal escalation process
- Independent ombudsman advises on remedy and helps draw out prevention measures
- Regular communication through various channels
- Public transparency on case handling and remediation action taken
- Internal briefings of leadership on trends, learnings and actions to take

Key strengths:

- **engaged potential users** in design
- regular **information in compelling formats** raises potential users' trust and confidence in the system



Good practice in textile manufacturing

Garment Sector Initiative

Fair Wear Foundation (FWF) Complaints Procedure

- membership organisation with shared Supplier Code of Conduct
- complaints procedure with shared responsibilities between FWF, member companies & suppliers
- complaints handlers in major garment producing countries, speaking local languages etc.
- publication of anonymised cases for shared learning & transparency
- just a 'safety net'

Key strength:

- Locally embedded case handlers for accessibility and trust
- Cooperation to resolve grievances and address root causes



<https://api.fairwear.org/wp-content/uploads/2020/09/Fair-Wear-Complaints-procedure-V2.0.pdf>

Good practice – Why do they work?

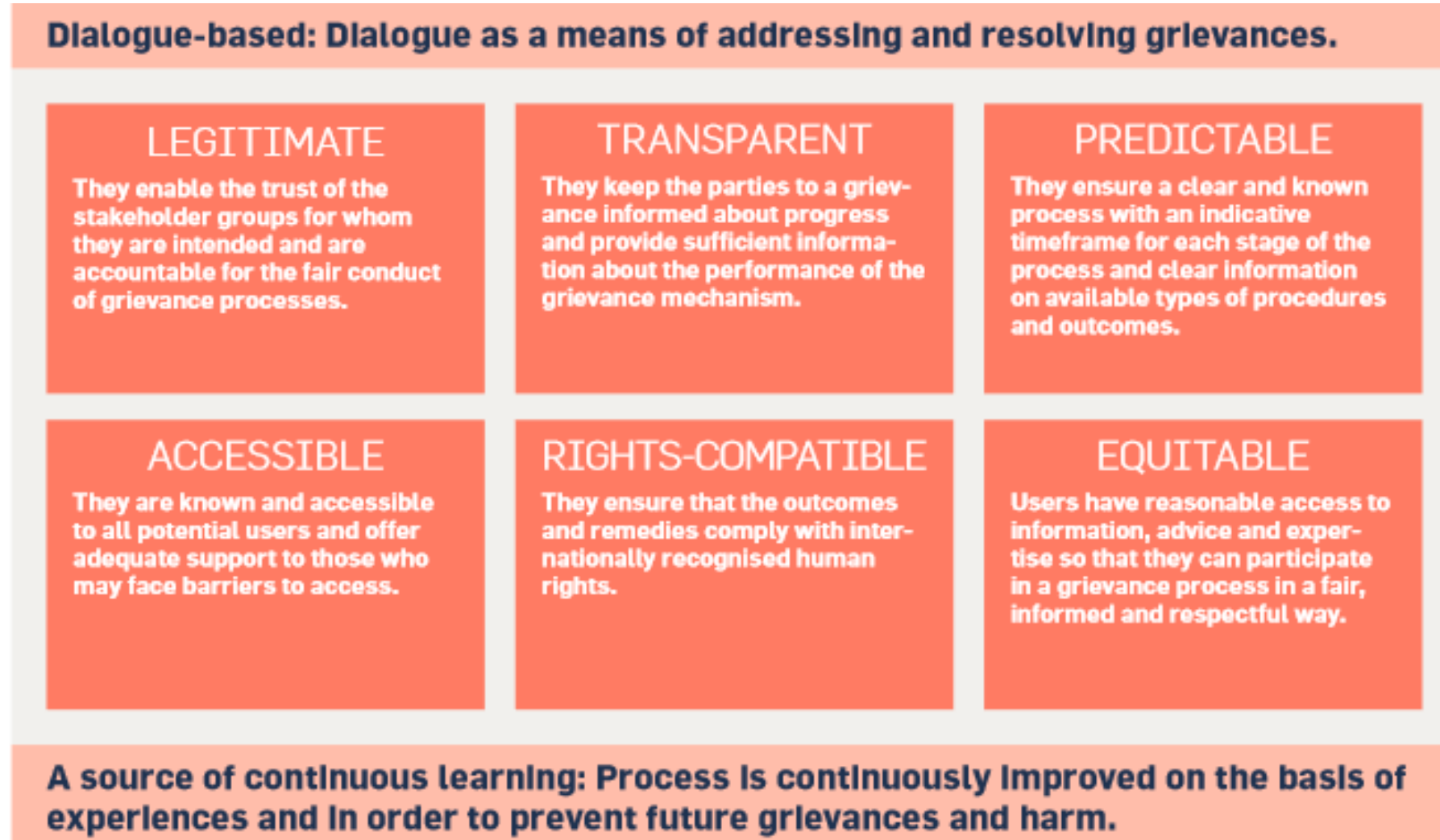
- Collaboration in design
- Clear, narrow scope
- The right external partners
- Familiarising users
- Keeping parties informed
- Access options
- Locally embedded case handlers
- Companies sharing information (on shared locations)
- Learning from findings
- Framing GM as a useful information system
- ...

Improving GM effectiveness

Effectiveness criteria in action



What determines effectiveness – 8 criteria



Source: [Global Compact Network Germany](#)

Effectiveness criteria operationalised

For each criterion:

- Highlights key elements of a functioning grievance management
- Provides key questions to screen and improve existing mechanisms
- Offers further questions for tourism companies to reflect on individually and collectively

5. Transparency

Aim: The mechanism keeps parties to a grievance informed about its progress and provides sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake.

Elements of a functioning system

- Communication with parties involved and the wider public
- Regular effectiveness monitoring and publication of results
- Keeping people safe by protecting anonymity (also see legitimacy)

Key questions

- Does the mechanism keep parties informed about the progress of their grievance?
- What information can be provided publicly to demonstrate that the mechanism is working, effective and can be trusted (e.g., statistics, case studies, detailed information about the handling of certain cases including outcomes and user feedback)?
- Where and how - along the remedy process and after - will case information need to be redacted/aggregated to protect people's identity?

Exemplary questions for the tourism sector

- How can the mechanism keep in touch with users when they are dispersed (communities) incl. such with no access to internet or users with unstable employment that move on frequently (seasonal/informal/short term workforce)?
- How could challenges and fears for tourism companies be overcome to publish case studies or statistics about grievances in an industry that relies heavily on customer reputation and is not used to communicating about cases of abuse and exploitation?
- How can insights from grievances be used within travel companies and towards the public to learn and continuously improve performance?

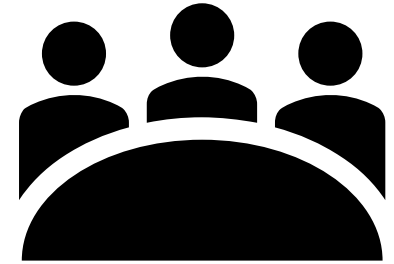
Improving effectiveness of grievance mechanisms

Group activity

How can we improve effectiveness of our own mechanisms?

Or mechanisms in the supply chain?

What support would we need for this?



Instructions

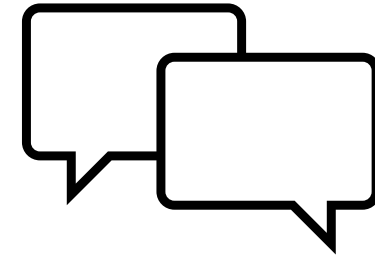
- Be as concrete as possible
- Focus on 2 of the 8 criteria
- Select person to report back

Break



Improving effectiveness of grievance mechanisms

In 90 seconds max: What are your **3-4 biggest findings / ideas / insights** from the group work?



The way forward

What do we need to move ahead?



Ways forward for the tourism sector

Level 1

Improve your existing GMs

- Use the effectiveness criteria approach to identify gaps and **improve your systems** where risk is highest, including existing sector-wide systems
- **Focus** particularly on 1) increasing accessibility and communication 2) being remediation-ready
- **Exchange** with your peers and learn from each others' experience

Level 2

Strengthen GMs in the value chain

- **Map** potentially vulnerable groups and environment for grievance management in key destinations and adapt approach accordingly
- **Integrate expectations** for effective GMs in supplier selection, monitoring and development
- Ensure **sector initiatives and certifications** encourage value chain actors to establish effective GMs

Level 3

Explore opportunities for collective action

- **Raise awareness** in the sector around importance of functioning GMs and build response capability
- **Work together** to share lessons learned, understand and strengthen local enabling environments for GMs and resolve „shared“ grievances
- **Build sector commitment** for a context-specific pilot project leveraging experience and existing work in other sectors

ROUNDTABLE HUMAN RIGHTS IN TOURISM

Ways forward



OUR VISION

We are the most impactful multi-stakeholder initiative to promote the rights of people in tourism.

- **Improve our capacity on the subject of grievance management**
 - Strategically: Establish a clear process/ approach with regard to grievance mechanisms as Roundtable

- **Include the issue in all activities in destinations**
 - Use our activities to network at destination level with actors working on the issue of grievance mechanisms

- **Offer practical support services for RT members**

