

Strengthening Human Rights Due Diligence Through Community-Based Monitoring

*Insights from a Four-Year
Programme in Pakistan*



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This report was prepared by the Business and Human Rights Division of Global Rights Compliance Foundation as part of its programme, Promoting and Advancing International Labor Rights in Pakistan's garment sector. The Division works across a spectrum of human rights risks, with a focus on operationalising human rights due diligence and promoting responsible business conduct.

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Disclaimer

The findings in this report draw on data collected through GRC's programme in Pakistan and its labour monitoring network across Sindh and Punjab, where the programme's Legal Aid Centres are located. Workers' access to the centres was made possible through outreach efforts, and their complaints were logged via MyVox, a platform developed by GRC. The data mentioned in the report was gathered based on workers' access to these centres, rather than through a randomly selected sample. While this data provides valuable insights into labour rights monitoring and remedy in the garment sector, it cannot be generalised to represent the entire country. The experiences captured reflect only the regions where GRC operates, and the findings should be interpreted as indicative of trends within these areas rather than as a national overview. Similarly, changes in supplier behaviour cannot be attributed to community-based monitoring alone. Multiple factors operate simultaneously, and isolating the programme's contribution is not feasible within the current methodology.

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Executive Summary

As mandatory human rights and environmental due diligence (mHREDD) frameworks expand globally, companies are searching for more effective ways to identify, prevent, mitigate and remediate adverse human rights impacts in their supply chains. Traditional tools, including social audits, grievance mechanisms, and internal monitoring systems, remain important, but are increasingly recognised as insufficient on their own. Because they often rely primarily on information provided by suppliers or auditors rather than affected rights-holders, they may fail to capture conditions on the ground, leaving systemic risks hidden and limiting companies' ability to respond early and effectively.

Since 2023, Global Rights Compliance (GRC) has led a programme in Pakistan, in partnership with local trade unions (TUs) and civil society organisations (CSOs), to address these shortcomings through a community-based monitoring (CBM) model. While CBM approaches have previously been used in other contexts, GRC has developed and operationalised the model specifically as a their human rights and environmental due diligence (HREDD) tool, adapting it both to support companies in identifying and addressing adverse impacts in their supply chains and to empower affected communities and rights-holders to raise concerns and access remedy. The model places workers' voices and worker organisation at the centre of human rights (including labour rights) monitoring, generating continuous, informed evidence at the community level.

The programme's findings show that the presence of trained community monitors (paralegals), Legal Aid Centres and the MyVox digital platform create trusted, locally grounded channels through which workers can report concerns, receive support and contribute to continuous monitoring. This enables companies to gain visibility of human rights issues that otherwise would not be identifiable, strengthens meaningful stakeholder engagement and, ultimately, contributes to more effective access to remedy for rights-holders.

The findings also indicate that CBM can reduce the time and costs associated with labour disputes. Through a continuous local presence, human rights violations can be identified and, in many cases, resolved at an early stage, helping to prevent disputes from escalating into lengthy court proceedings. Although the evidence presented in this report is grounded in a programme focused on labour rights in the garment sector, the CBM methodology is not limited to labour rights or the garment industry. Its underlying principles can be adapted to support the identification, prevention, mitigation and remediation of a broader range of corporate-related human rights impacts, including environmental human rights impacts affecting local communities, Indigenous Peoples' rights, and forced labour risks across global value chains.

This report also explores how companies can strengthen their HREDD processes by integrating a CBM model into their existing systems and by supporting trusted local

organisations working at the forefront of labour rights and human rights protection in sourcing countries. When used as a complementary due diligence tool, CBM can improve the quality and continuity of human rights information available to companies, strengthen trust and accountability across supply chains, and contribute to more effective remediation outcomes.

Finally, the report identifies the conditions necessary to scale CBM beyond pilot initiatives. Achieving sustainable impact will require companies to integrate CBM into their HREDD processes, work through trusted local implementation partners, collaborate across sectors through collective approaches, and support predictable long-term financing models. Embedding CBM within corporate due diligence systems offers companies an opportunity to move beyond

fragmented, project-based initiatives towards more continuous, rights-holder-centred and effective HREDD processes that strengthen risk management while delivering better outcomes for both businesses and affected rights-holders.

Awareness raising session of garment workers under the GRC led programme



1

Introduction



This report draws on evidence from a four-year programme in Pakistan's garment sector, which addressed the shortcomings of traditional human rights due diligence tools — including social audits and grievance mechanisms — by implementing a community-based monitoring (CBM) model to identify, monitor and remediate labour rights impacts.

The primary rights-holders throughout the programme are garment workers, whose experiences and perspectives form the basis of the evidence presented in this report. Throughout the report, the terms “rights-holders” and “workers” are therefore used in complementary ways. “Rights-holders” is used when discussing CBM as a broader model that can be applied across different contexts to complement HREDD processes, while “workers” is used when referring specifically to the evidence and experiences generated through GRC’s programme in Pakistan, where workers are the relevant rights-holders.

Through this initiative, **22 Legal Aid Centres have been established across Sindh and Punjab provinces**, serving as trusted community hubs where workers can attend human rights awareness sessions, access legal support and report labour rights violations. The centres are staffed with local community monitors (paralegals), who are trained and responsible for receiving and documenting complaints into [MyVox](#), a digital platform developed by GRC that aggregates rights-holders reported human rights violations from garment factories across three major industrial hubs in Pakistan: Karachi, Lahore, and Faisalabad. To support this report and validate the programme’s findings, GRC conducted consultations with local partners, paralegals recruited for the programme, and workers. GRC also distributed an online survey to international brands involved in the garment sector, to which 13 brands responded.

The programme partners:

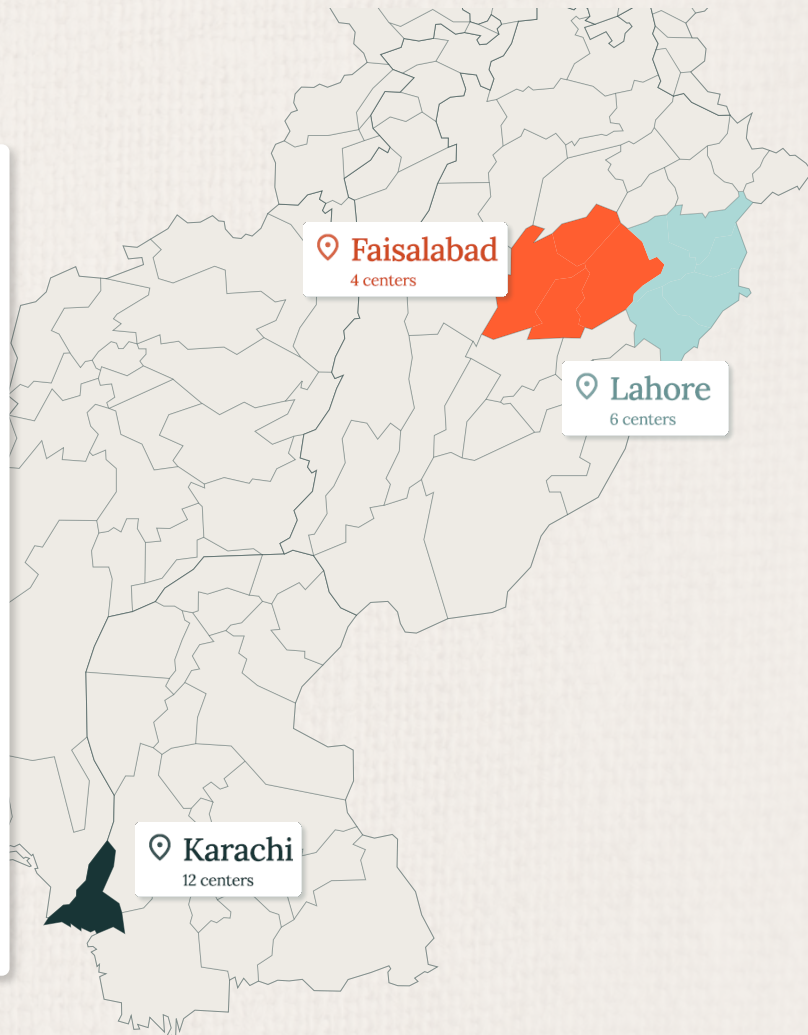
Pakistan Institute of Labour Education and Research (PILER), the National Trade Union Federation (NTUF), the Home-based Women Workers Federation (HBWWF), the Labour Education Foundation (LEF), and the Labour Behind the Label (LBL).



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The evidence presented in this report demonstrates how CBM can strengthen companies' HREDD processes by complementing traditional audit-based approaches with continuous, rights-holder-informed information that enhances stakeholder engagement and supports more effective remediation. By operating through trusted community-based structures, CBM enables rights-holders to raise concerns in a safe and accessible environment, particularly where barriers such as fear of retaliation, power imbalances, or lack of trust limit engagement through formal or company-managed channels.

This engagement generates a continuous flow of information that helps companies identify risks, better understand systemic patterns, and respond more effectively to adverse impacts. The timing of this discussion is particularly relevant given the rapid evolution of mHREDD legislation across a multitude of jurisdictions. In particular, the report considers the implications of the Corporate Sustainability Due Diligence Directive (CSDDD), which establishes extensive human rights and environmental obligations for companies linked to the EU market.



Garment worker receiving legal guidance by paralegal under the GRC led program

The report is intended primarily for companies, brands, and other supply chain actors, particularly those sourcing from high-risk countries. It will also be relevant for civil society organisations, trade unions, rights-holders, sustainability and human rights practitioners, compliance teams, investors, and policymakers seeking more effective approaches to human rights monitoring, stakeholder engagement, and remediation.

2

Understanding Community-Based Monitoring



Community-based monitoring has to date offered a powerful mechanism for strengthening accountability, transparency, and long-term outcomes across a wide range of sectors. Originally developed in the context of environmental governance,¹ it has been increasingly applied in healthcare², economics³ and social development contexts⁴, as well as anti-corruption initiatives⁵ where community participation has consistently shown to improve service delivery and results.

CBM is particularly valuable in contexts where formal oversight systems are weak, under-resourced, or disconnected from the populations they are meant to serve. By generating community-derived evidence, it creates a bridge between local realities and institutional decision-making, surfacing issues that might otherwise remain invisible, especially those affecting marginalized or vulnerable groups such as women, migrant workers, youth, and low-income communities. Rather than serving solely as a monitoring

mechanism, effective CBM establishes continuous feedback loops between communities, companies, institutions, and decision-makers. Importantly, when communities are involved in monitoring, they are more likely to develop ownership over outcomes and contribute to practical, locally grounded solutions.

Digital technologies are increasingly enhancing this potential by enabling more continuous, timely and accessible stakeholder engagement, facilitating the collection, aggregation and communication of information at scale. However, it is critical that technology is not viewed as a substitute for meaningful engagement. Consistent with the UN Guiding Principles on Business and Human Rights (UNGPs), digital tools are most effective when they complement trusted, human-centred relationships, helping to reduce barriers to participation while supporting safe, inclusive and ongoing dialogue with rights-holders.⁶



Capacity Building Session by Labour Education Foundation, Lahore

Technology therefore enhances CBM but does not define it. The effectiveness of CBM depends primarily on trusted community relationships that encourage rights-holders to share information that might otherwise remain undisclosed.

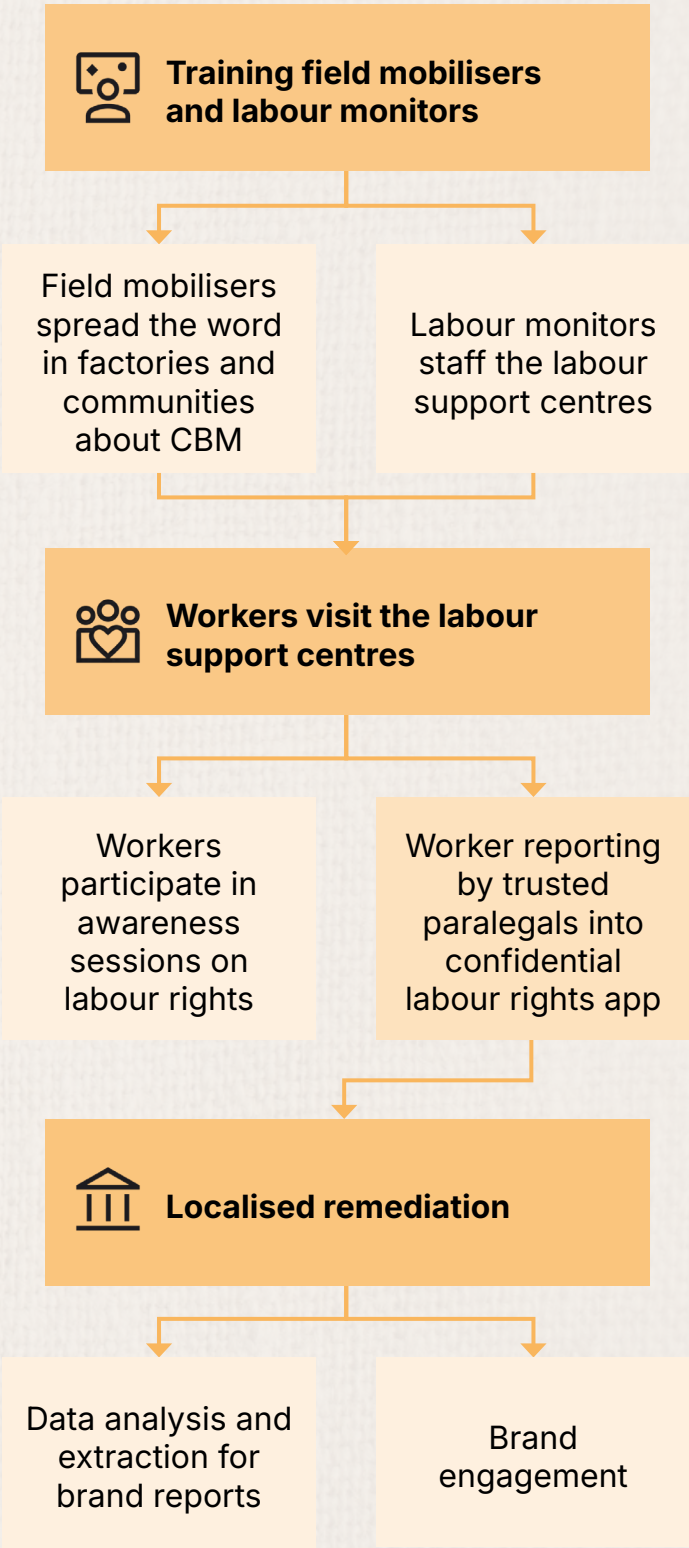
These characteristics make CBM particularly relevant within the business and human rights field, where companies are increasingly expected to engage meaningfully with right-holders as part of their HREDD processes. Despite its application across different sectors,⁷ CBM continues to be misinterpreted, and it is often associated with similar initiatives, such as citizen science, volunteer monitoring, government and other forms of community engagement research⁸. Whilst these approaches share common features, they differ in their objectives, governance structures and methodologies, and no universally accepted definition of CBM currently exists.

In this sense and for the purposes of this report, CBM should be understood as a participatory methodology through which rights-holders and trusted local actors actively contribute to identifying, documenting and reporting actual or potential adverse impacts through safe, confidential, independent and community-based reporting mechanisms.

Trust is central to this approach. By relying on trusted local actors and long-term community relationships, CBM reduces barriers to participation and enables information that reflects the lived experiences of rights-holders.

What is Community Based Monitoring?

An end-to-end, community-based system that builds worker awareness, enables trusted reporting, and drives local remediation.



The concept of CBM can be understood through three interrelated elements.

C B M

The “Community” (C)

Common definition of “community” is groupings of people with shared interests, social interactions, behavioural norms, and or geographical location.

Depending on the context, **this may include workers, local communities, Indigenous Peoples, trade unions, civil society organisations or other rights-holders and trusted intermediaries.** In the Pakistan programme, “community” refers to workers and their surrounding labour ecosystems, including worker organisations, unions, and trusted intermediaries. These are the actors best positioned to observe, understand, and report labour rights conditions in real time.

The “Based” (B)

“Based” reflects that monitoring is embedded within the relevant community rather than being conducted solely by external actors.

It relies on trusted community structures and relationships that enable rights-holders to participate. **During the programme conducted in Pakistan, workers were not passive informants;** they played an active role in designing how monitoring works, what issues were prioritised, and how reporting mechanism’s function.

The “Monitoring” (M)

“Monitoring” refers to the continuous and systematic generation and analysis of rights-holder-informed information about actual and potential adverse impacts.

Depending on the context, this may **include documenting human rights and environmental impacts, workplace conditions, community concerns, or other issues** affecting rights-holders, identifying patterns over time, and facilitating follow-up through appropriate remediation pathways.

Rather than constituting a grievance mechanism, or replacing existing monitoring tools such as social audits, CBM complement HREDD processes by generating continuous, community-derived information. By creating trusted, ongoing channels through which affected rights-holders can safely raise concerns, share experiences, and provide feedback throughout the HREDD process, thereby supporting meaningful stakeholder engagement rather than one-off consultation exercises.

In doing so, it strengthens companies' ability to identify and understand actual and potential adverse impacts, informs prevention and remediation measures, enhances accountability, and facilitates more effective access to remedy. CBM can therefore contribute to several stages of the HREDD process, including identifying and assessing adverse impacts through continuous rights-holder-informed information, supporting meaningful stakeholder engagement, tracking responses over time, and facilitating access to remedy where harm has occurred.

Field visit of GRC team of a Legal Aid Centre operated by PILER



3

The Business Case for Community-Based Monitoring



For companies seeking to comply with mHREDD legislation and strengthen their HREDD processes, one of the greatest challenges is obtaining reliable information about actual and potential adverse impacts across their operations and supply chains and how to respond effectively when issues are identified. To meet these expectations, many companies have invested heavily in social audits, supplier assessments, certifications, grievance mechanisms, and compliance programmes.

Although these tools remain important, they often provide only a partial picture of the conditions on the ground. They struggle to identify real-time issues and lack continuous visibility into human rights risks, particularly where rights-holders are reluctant to disclose through formal channels, due to fear of retaliation, lack of trust, or other barriers to meaningful participation.

Consistent with these broader challenges, the companies surveyed for this report identified limited detection of hidden issues, such as harassment and gender-based violence, together with the lack of continuous monitoring, as the principal shortcomings of existing approaches. The lack of workers' uptake is also recognised as a limiting factor for effective labour rights monitoring and risk identification.

Common issues with existing tools

- * Too periodic, too formalised, or too distant from rights-holders' lived reality to be effective.
- * Not built for contexts shaped by fear, coercion, subcontracting opacity, retaliation risk, or low trust.
- * Not designed to detect hidden or severe harms early enough.
- * Serious harms often surface only when they are systemic, public, or crisis-level.

→ **Audits**

provide periodic snapshots, not continuous monitoring

→ **Worker voice surveys**

can identify trends, but often lack escalation pathways

→ **Operational grievance mechanisms**

are underused, inaccessible, or mistrusted



Awareness raising of garment workers by Home Based Women Workers Federation, Karachi

CBM seeks to address these gaps. The evidence from GRC's programme in Pakistan demonstrates that CBM generates value for companies through two interconnected ways:



Strengthening the identification and assessment of human rights risks

CBM produces continuous information directly from rights-holders through trusted, independent community structures that workers are more willing to engage with than traditional workplace channels.

Unlike periodic audits, which capture conditions at a specific moment in time, CBM offers an ongoing picture of the reality that rights-holders face and emerging risks. This continuous flow of information enables companies to identify issues that might otherwise remain undetected between audit cycles or within formal grievance mechanisms.

Because information is collected through trained local intermediaries and structured reporting systems, it can be verified, aggregated, and analysed to identify patterns and trends across suppliers, sourcing regions and categories of human rights impacts. This provides companies with a more robust evidence base for prioritising risks and informing due diligence decisions.



Enabling earlier intervention and more effective remediation

By connecting workers with trusted support mechanisms and existing accountability channels, CBM helps ensure that concerns are raised and addressed closer to the source of harm.

This enables companies and other relevant actors to respond before concerns escalate into formal legal disputes, industrial action, reputational crises or regulatory scrutiny. Earlier intervention can reduce both the human impacts experienced by workers and the financial and operational costs associated with unresolved grievances.

Importantly, CBM strengthens access to remedy by increasing rights-holders' awareness of their rights, reducing barriers to reporting, supporting the resolution of concerns where appropriate, and generating information that can inform more effective corrective action and continuous improvement across supply chains.

CBM can generate continuous, rights-holder-informed data, strengthen access to remedy, and support meaningful stakeholder engagement.

Together, these two features create three strategic advantages for companies:

3.1 Early Visibility and Intervention

One of the most significant challenges in supply chain management is the ability to identify actual and potential human rights impacts early enough to prevent harm from occurring or escalating. Evidence generated through GRC's programme in Pakistan has shown that CBM can function as an effective early-warning system. Through trusted reporting channels, workers were able to report concerns as they emerged, rather than after they had escalated into formal disputes. Local paralegals assist workers in drafting grievance notices directly, and a significant portion of cases are resolved through dialogue and settlement before ever reaching court, sometimes within as few as fifteen days where centres are present.

The primary advantage of CBM is the trust-building process with rights-holders. This matters enormously in a context such as the Pakistan garment sector, where the single most cited barrier to workers raising grievances is fear of repercussion and job loss. As workers report to paralegals outside the factory, and only after a relationship of confidence and confidentiality has been established, issues surface before they escalate to dismissal, legal action or media exposure.

Evidence collected through MyVox has indicated that many of the issues reported through CBM are among the most difficult for companies to identify through conventional monitoring approaches. These include workplace harassment, abuses linked to contracting and subcontracting arrangements, excessive overtime, wage-related violations and other labour rights concerns that workers may be reluctant to disclose during factory-based assessments. As a result, CBM provides companies with access to rights-holder-informed information that complements traditional monitoring tools and improves visibility of workplace conditions.

This added value is particularly evident in cases of harassment and gender-based violence, where workers often face significant barriers to reporting through workplace grievance mechanisms. By creating trusted reporting channels through Legal Aid Centres and other community-based structures, CBM enables women and other vulnerable rights-holders to raise concerns in environments perceived to be safer, more independent and more accessible than factory-based mechanisms and, in some circumstances, even state-based processes.



Training session by Labour Education Foundation, Lahore

Real-time monitoring

Unlike periodic audits, CBM also generates a more granular and real-time picture of human rights conditions than traditional compliance tools offer alone.

GRC's partner organisations in Pakistan observed that while violations such as unlawful dismissals and unpaid wages were already known to exist, it was *"the scale and their systematic recording"* that was made clear thanks to the work of paralegals and the MyVox monitoring tool aggregating data across locations.

As of 30 June 2026, MyVox had recorded **7517 complaints**, of which **6943 (92%) related with the garment sector**.

These complaints identified a total of **16414 labour rights violations**, and each complaint typically involves more than one type of violation.

These figures demonstrate not only the scale of the evidence generated through CBM, but also that workers' experiences frequently involve multiple issues concurrently rather than isolated incidents.

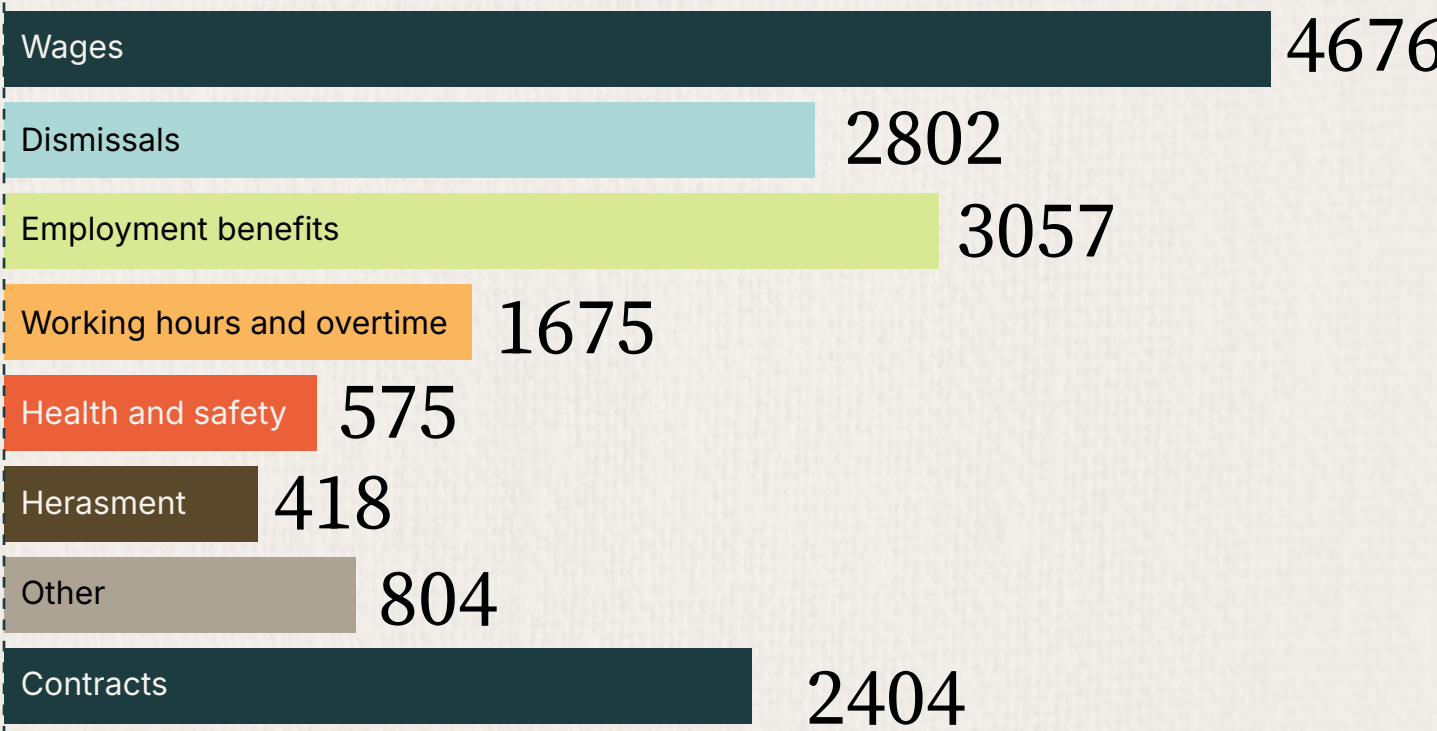
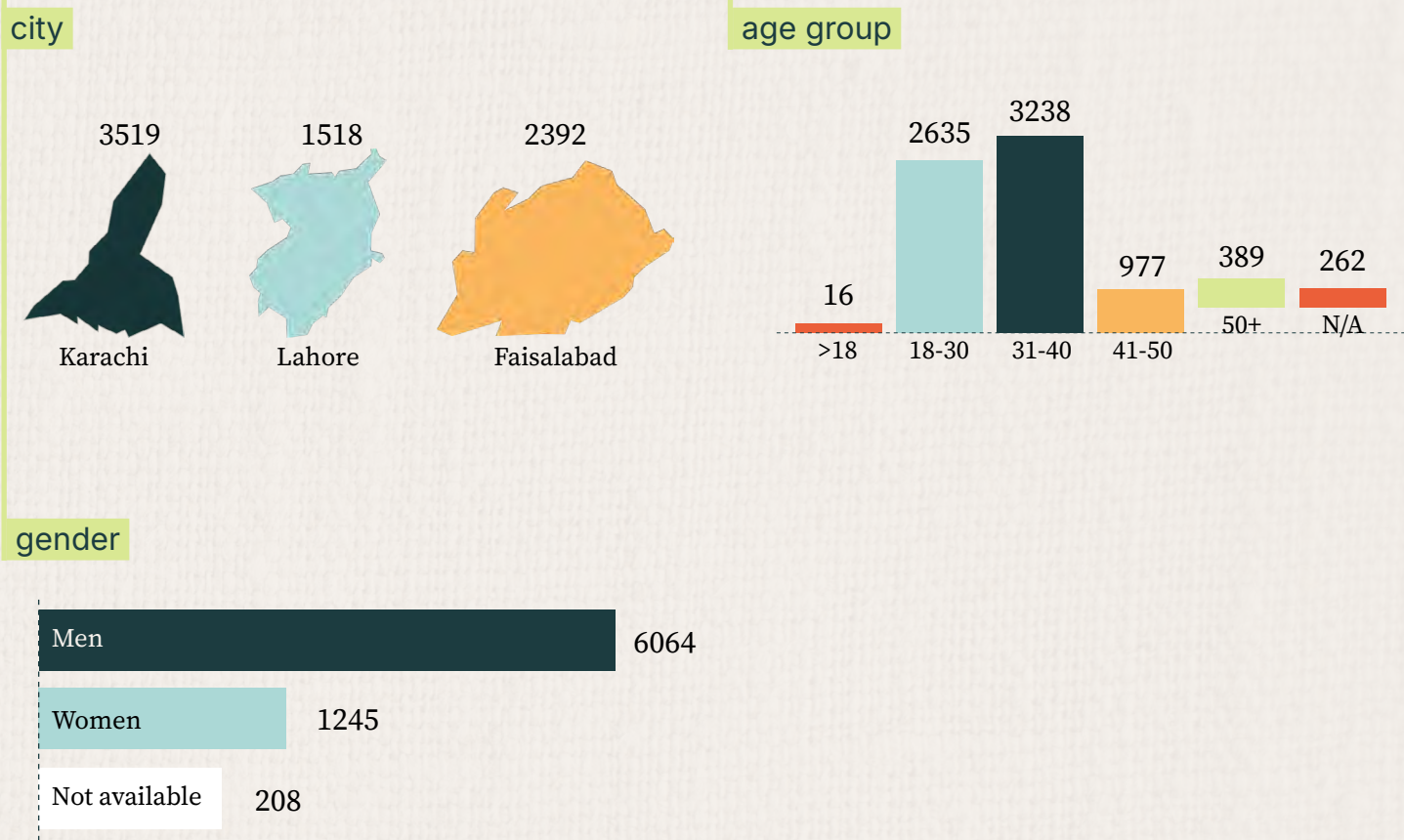
In this sense, beyond documenting individual cases, the programme generated insights that periodic assessments rarely provide. Analysis of MyVox data revealed recurring patterns of interrelated human rights violations within the same workplaces.

Wage-related violations, for example, frequently coincided with contracting irregularities, denial of social security benefits and unfair dismissals. By making these relationships visible over time, CBM enables companies to move beyond responding to individual cases towards identifying systemic patterns, understanding root causes, and designing more targeted preventive and corrective measures.

Awareness raising of garment workers by Home Based Women Workers Federation, Karachi



7517 complaints



Filling the gaps of traditional monitoring tools

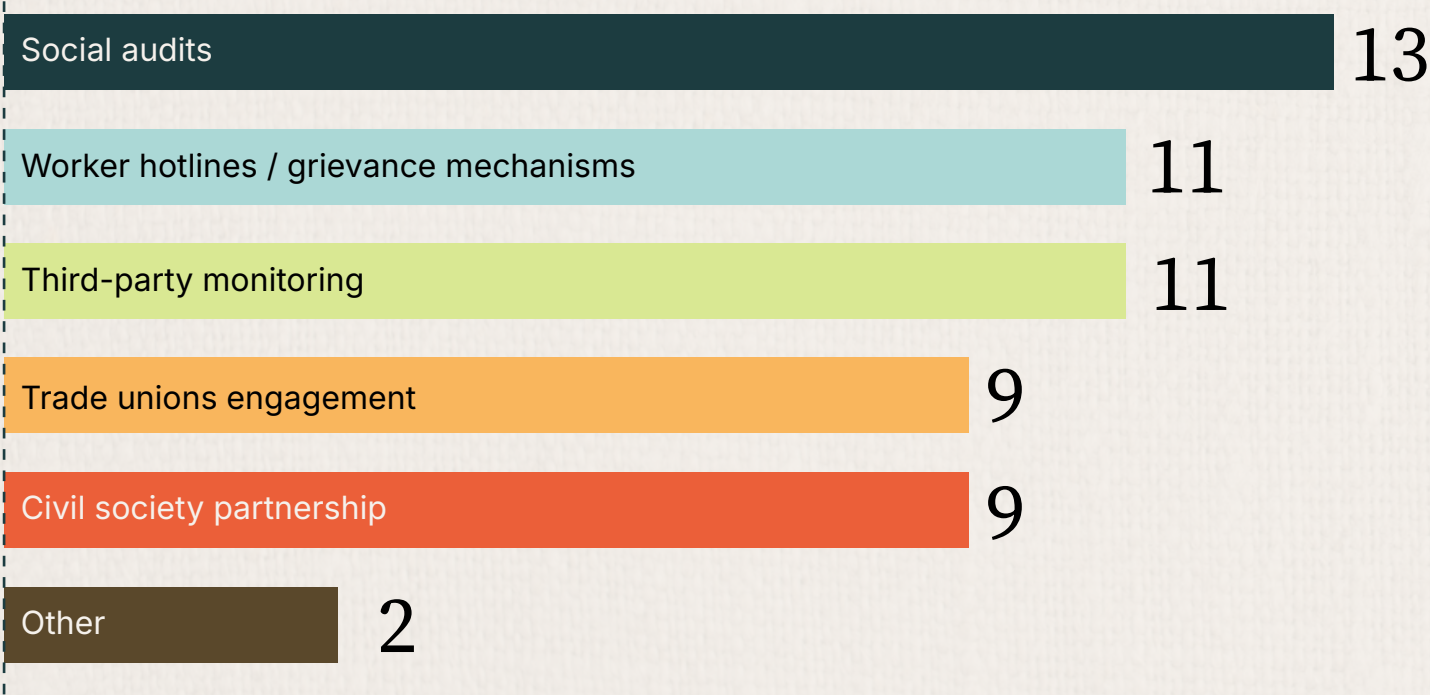
International brands responding to a survey produced and disseminated by GRC confirmed that social audits are the most used monitoring methods (used by all respondents), followed by workers hotlines, grievance mechanisms and third-party monitoring (83% of respondents).

However, more than 80% of respondents consider audits only *"somewhat effective"*.

The limitation of audit-based approaches has become increasingly evident over the past decade. Industrial disasters, such as the Ali Enterprises factory fire in Pakistan and the Rana Plaza collapse in Bangladesh, occurred despite factories having undergone social audits.

Since then, civil society organisations, such as Human Rights Watch⁹, the Clean Clothes Campaign¹⁰ and the AFL-CIO¹¹ and auditing firms themselves, such as ELEVATE¹² and Impactt¹³, have acknowledged that audits often struggle to identify certain categories of labour rights violations.

Which tools is your company currently using to monitor labour conditions?



Graph 1: survey responses

GRC survey's findings reinforce this conclusion:



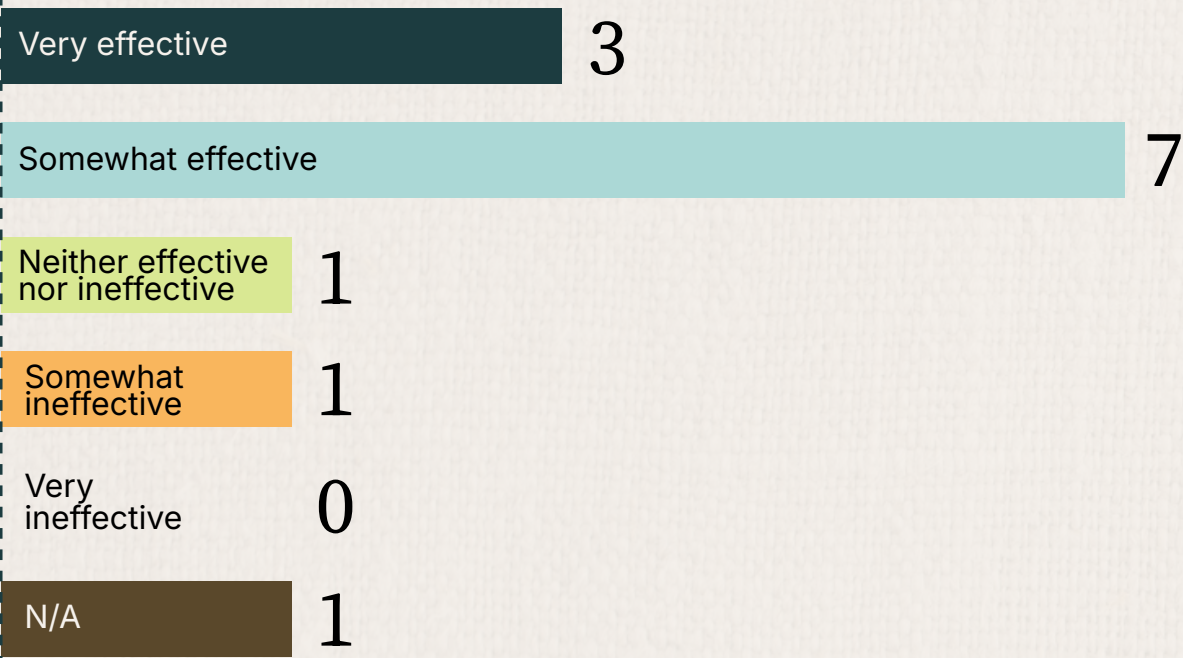
Several factors explain these shortcomings. First, audits provide only a snapshot of working conditions at a specific point in time rather than a continuous understanding of workplace realities and human rights conditions. As a result, adverse impacts that emerge between audit cycles may remain undetected until the next assessment, if they are identified at all. The limited duration of most audits also restricts auditors' ability to follow up on potential concerns or conduct in-depth engagement with workers.

Secondly, many human rights impacts are difficult to detect because rights-holders may not feel safe speaking openly. This is a common challenge during factory-based assessments or other company-led monitoring activities, where fear of retaliation or even loss of employment can discourage workers from disclosing sensitive issues such as harassment, discrimination, coercion, gender-based violence, or freedom of association concerns. Where trusted relationships have not been established, rights-holders may choose not to report concerns at all, limiting the effectiveness of conventional monitoring

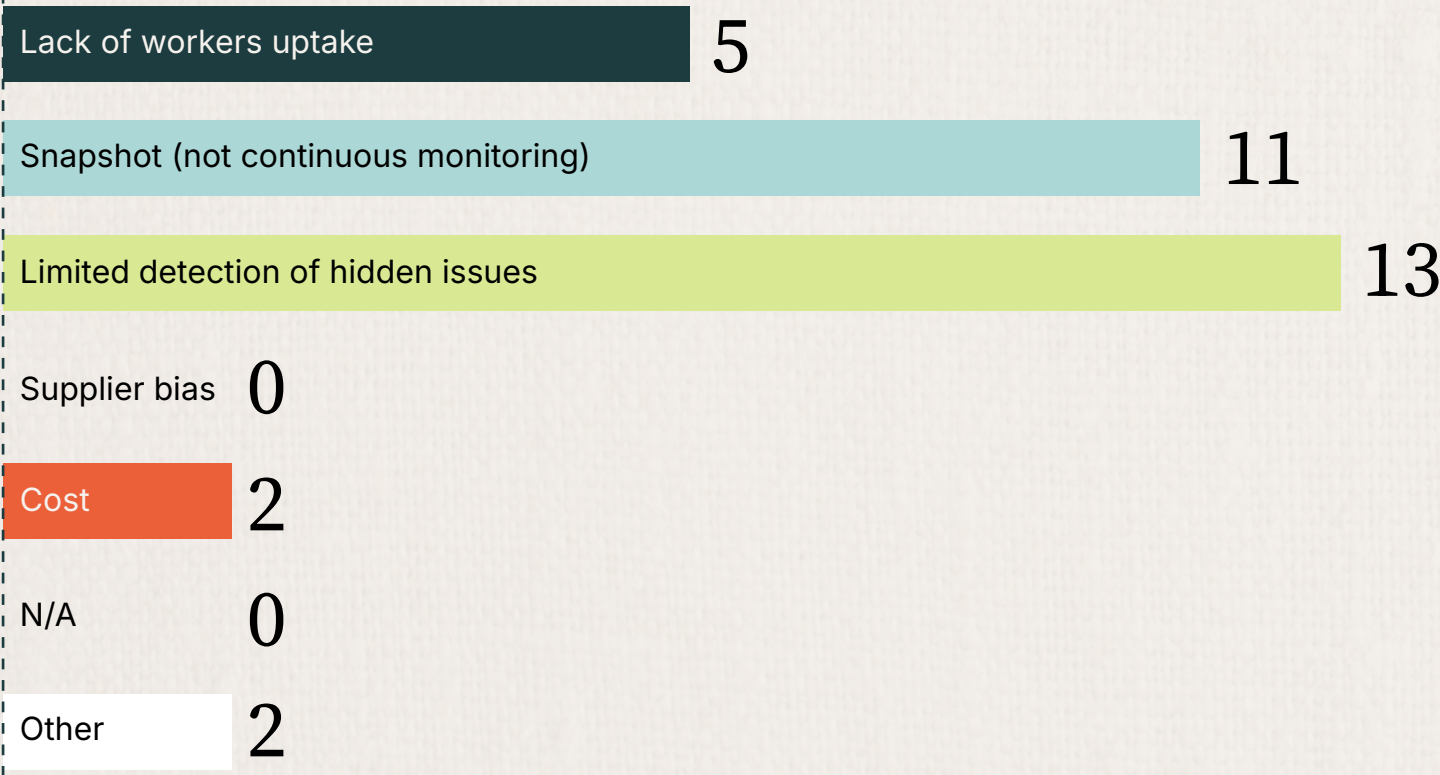
approaches. In addition, the effectiveness of audits can be affected by structural conflicts of interest within the auditing system itself. Because audits are often commissioned and financed by buyers or suppliers, concerns have been raised regarding commercial pressures that may influence audit outcomes.

At the same time, suppliers may take steps to conceal non-compliance during inspections through document manipulation, worker coaching, or other forms of audit preparation. These practices can undermine the reliability of audit findings and make it difficult to obtain an accurate picture of conditions on the ground. Finally, audit findings are typically captured as isolated compliance observations rather than as part of a broader analysis of worker experiences over time. This can make it difficult to identify recurring patterns, root causes, or systemic risks across suppliers and sourcing regions. Moreover, audit findings and corrective actions are often not shared with workers or other stakeholders, limiting transparency, reducing trust in the process, and weakening opportunities for accountability and learning.

Brands were asked: In your experience, how effective are your current operational grievance mechanisms in delivering remedy among workers?



What have been the main limitations of social audits for your company, if any?



Graph 2-3: survey responses

CBM helps address many of these limitations. By operating outside factory premises through trusted community structures, it creates safer opportunities for rights-holders to report concerns. Continuous reporting generates real-time visibility, while aggregated data helps identify recurring patterns and root causes across supply chains. Whilst CBM is not intended to replace social audits, it complements existing monitoring systems by providing the type of continuous, rights-holder-informed intelligence that enables companies to understand what occurs between audit cycles and beyond factory gates.

The value of such an independent and continuous source information may be particularly relevant where human rights impacts are difficult to identify through conventional monitoring, including indicators of forced labour. Affected workers may be particularly reluctant to disclose concerns

in workplace settings where doing so could expose them to retaliation or other consequences. Trusted community-based reporting channels can provide an additional source of information on issues such as recruitment-related abuses, restrictions on movement, withholding of wages, or other forms of coercion.

Overall, the evidence suggests that CBM strengthens companies' ability to identify and understand actual adverse impacts at an earlier stage than traditional compliance tools alone. By improving the timeliness, continuity and quality of rights-holder-informed information, CBM enables earlier intervention, more informed decision-making and more effective human rights due diligence.

Training of garment workers by Labour Education Foundation



“Community-based monitoring represents a significant value addition to existing labour compliance efforts. A credible, trusted channel rooted in local communities, independent of management, and able to provide continuous, real-time information directly from workers could effectively complement Better Work’s current model to promote sustainable workplace compliance in Pakistan.”

— Ivo Spauwen, Programme Manager, ILO Better Work Pakistan Programme

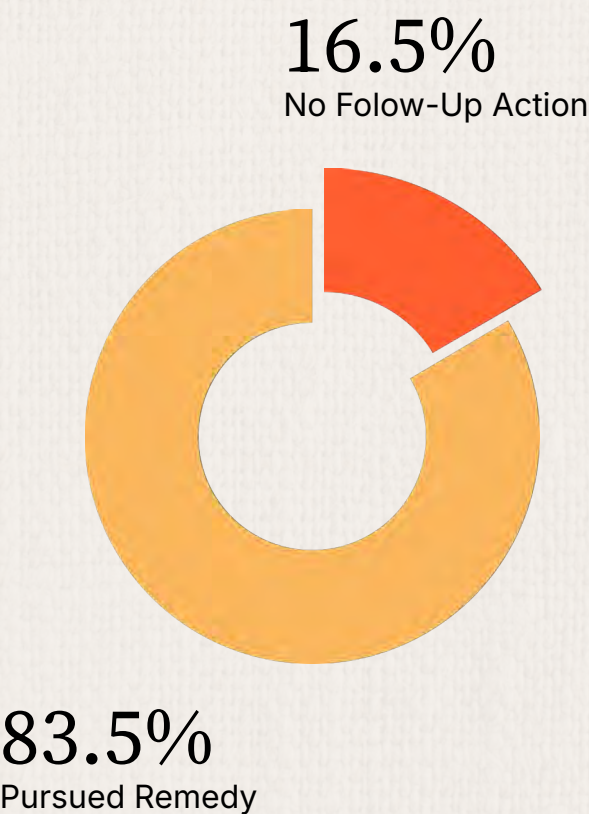
3.2 Access to Remedy

Identifying adverse impacts is only one element of an effective HREDD process. Companies are also expected to ensure that adverse impacts are addressed and, where appropriate, remediated. Programme evidence suggests that CBM contributes to this objective by connecting affected rights-holders with trusted local support structures capable of facilitating remedy. Furthermore, the programme shows that successful remediation for one worker directly drives uptake by others: word-of-mouth referrals from peers who have obtained remedy is the primary driver of the identification of new cases. With free legal support from local paralegals, 83,5% of cases reported through MyVox had progressed to a remediation channel by 30 June 2026.

This is not only more effective for workers, but also reduces legal, operational, and reputational risks for companies.

The success of CBM cannot be justified by a reporting mechanism alone, but rather by **a set of reinforcing conditions that enable rights-holders to engage and sustain participation over time:**

- ✳ **Human and labour rights education** plays a foundational role by increasing rights-holders' awareness of their rights, available support mechanisms, and expectations around remediation, helping them recognise violations and understand that reporting could lead to action.
- ✳ **Legal Aid Centres not affiliated with factory management** means that workers perceive them as more trustworthy than supplier-controlled channels, reducing concerns around conflicts of interest and retaliation. This perception of independence appears particularly important in contexts where rights-holders have limited confidence in grievance mechanisms.
- ✳ **Trust is built over multiple interactions**, as reporting often occurs throughout repeated visits, observing outcomes for others, and building confidence that concerns would be treated confidentially and acted upon.
- ✳ **The programme's free-of-charge legal support** reinforces participation by reducing financial and procedural barriers that prevent most workers from pursuing remedy.

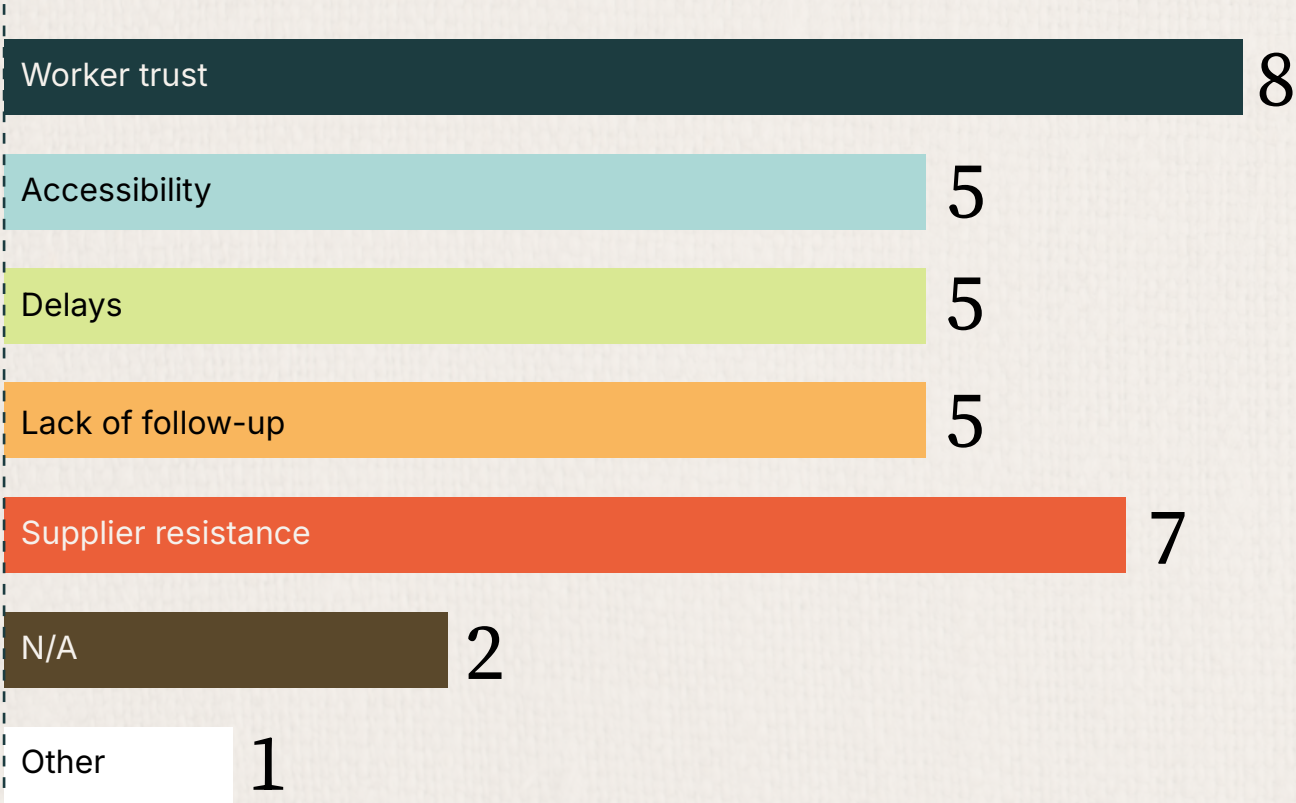


Surveyed brands identified worker trust (63%) and accessibility (50%) as the top remediation challenges, the same gaps CBM is designed to address. Supplier resistance was also flagged by 50% of responding brands as a barrier to remedy.

The programme demonstrates that trusted community-based support increases workers' willingness to seek remedy and helps resolve grievances closer to the source of harm.

CBM does not replace formal institutions or existing grievance and remediation mechanisms. Effective remedy depends on a broader enabling environment, including responsive public institutions, supplier cooperation, functioning legal frameworks, and meaningful engagement with trade unions and other stakeholder representatives. Rather, CBM strengthens access to these existing pathways by making them more accessible, trusted, and navigable for affected rights-holders.

What are the key challenges in remediation? (please select three most critical ones)



Graph 4: survey responses

“Many workers come to us at a point of crisis, especially when they are dismissed, threatened, or denied wages and legal dues. In such cases, timely support, practical advice, and continued communication help build confidence in the system.”

- Khalid Mahmood, Labour Education Foundation (LEF)

3.3 Meaningful Stakeholder Engagement

Meaningful stakeholder engagement is a core component of effective HREDD. International standards such as the UNGPs and the OECD Guidelines for Multinational Enterprises, recognise that companies cannot effectively identify, prevent, mitigate or remediate adverse impacts without engaging with those who may be affected by their operations and value chains. This expectation is reflected in more recent legislation including the CSDDD, the EU Forced Labour Regulation (EUFLR), the German Supply Chain Due Diligence Act (LkSG), and the Norwegian Transparency Act.

Meaningful Stakeholder Engagement under the CSDDD

Under the CSDDD, companies are expected to engage with affected stakeholders throughout the due diligence process, including when identifying and assessing impacts, developing prevention and corrective action plans, implementing remediation measures, and monitoring effectiveness. The Directive also requires companies to consider barriers to participation and to ensure that stakeholders can engage without fear of retaliation.

Who are the relevant ‘stakeholders’ under the CSDDD?

Under the CSDDD, ‘stakeholders’ include the company’s employees, the employees of its subsidiaries, trade unions and workers’ representatives, consumers and other individuals, groups, communities or entities whose rights or interests are or could be affected by the products, services and operations of the company, its subsidiaries and its business partners. This includes the employees of the company’s business partners and their trade unions and workers’ representatives, national human rights and environmental institutions, civil society organisations whose purposes include the protection of the environment, and the legitimate representatives of affected individuals, groupings, communities or entities.¹⁷



Training of garment workers by Labour Education Foundation

What should engagement look like under the CSDDD?

Under the CSDDD, stakeholder engagement is expected to be a continuous process across the due diligence cycle, not a one-off consultation.

Companies should ensure that affected stakeholders receive relevant information and have opportunities for ongoing dialogue including at site or operational level. Engagement should be both **"meaningful"** and **"effective"**¹⁸ meaning that companies should provide **"relevant and comprehensive information"** to stakeholders, enabling their informed participation.

Engagement should also take account of barriers to stakeholder participation, as well as the particular vulnerabilities and disproportionate impacts experienced by certain stakeholder groups. Companies should ensure that stakeholders can participate safely, including through protection from retaliation and the use of confidentiality where necessary.¹⁹

In this context, women's cafés established by GRC as part of its CBM model represent an innovative, gender-responsive means of operationalising the CSDDD's stakeholder engagement requirements. By providing women workers with a trusted, accessible and confidential space within their communities, they can help overcome social, cultural and practical barriers that may prevent women from participating in conventional workplace consultations or grievance mechanisms.

Their continuous local presence also enables engagement to move beyond periodic consultation, creating an ongoing channel through which women workers can share information, raise concerns, receive support and contribute to the identification and monitoring of adverse impacts. Women's cafés and other worker hubs can therefore strengthen both the inclusiveness and the effectiveness of stakeholder engagement throughout the due diligence process.

Where direct engagement is not possible, companies are expected to consult additional experts capable of providing credible insights into actual or potential adverse impacts.²⁰

For many companies, translating these expectations into practice remains challenging. Supply chains are often geographically dispersed and characterised by multiple layers of subcontracting, temporary employment and informal work. Companies frequently rely on information supplied by business partners, periodic audits or *ad hoc* consultations, which may provide only limited opportunities for affected rights-holders to participate directly in HREDD processes.

CBM provides a practical mechanism for bridging this gap and maintaining sustained engagement with rights-holders, particularly in contexts where direct engagement is difficult to establish or maintain. In fact, companies do not need to create entirely new structures from scratch to realise its benefits. In many sectors and sourcing contexts, community-based structures already exist in one form or another. Companies can support and build on these mechanisms, integrating them into their due diligence processes, including their risk identification, monitoring and remediation processes.

Engaging with affected rights-holders

Rights-holders are often difficult for companies to reach directly, particularly in complex supply chains. Companies also face substantial barriers to accessing rights-holders' knowledge and experiences. Limited geographical proximity to suppliers, language barriers, and insufficient understanding of local cultural and social contexts all constrain companies' ability to gain meaningful insight into what is happening across their supply chains. As a result, engagement frequently relies on periodic consultations, supplier-provided information, or audit interviews, which offer only intermittent and indirect insights.

CBM can complement these approaches by providing an additional channel for ongoing stakeholder engagement. Through structures such as worker centres, legal aid clinics, trade unions, or civil society organisations, companies may gain access to rights-holders' perspectives outside of formal audit processes and factory-managed communication channels.



In practice, CBM may support stakeholder engagement requirements in several ways:

- * Provides regular identification and assessment of actual and potential adverse impacts through continuous feedback from affected rights-holders.
- * Creates opportunities to gather and rights-holders perspectives when developing preventive or corrective measures.
- * Supports consultation on remediation processes and outcomes.
- * Helps identify barriers that prevent rights-holders from raising concerns and accessing grievance mechanisms or other remedy pathways.
- * Facilitates engagement with rights-holders who may not use traditional grievance mechanisms.
- * Generates information that can be used to assess the effectiveness of due diligence measures over time.
- * Empowers rights-holders through human and labour rights awareness through the operation of Legal Aid Centres embedded in communities.

An additional advantage of CBM approaches is their ability to **engage groups that are often underrepresented** in traditional monitoring systems, including women workers, migrant workers, temporary workers, and workers employed through labour contractors.

Consultation of aggrieved workers with Women Worker's Champion at Legal Aid Centre run by local partner organization (LEF) in Faisalabad

Engaging with suppliers

CBM can also contribute to a shift in suppliers' corporate behaviour, with the potential to function as an additional accountability mechanism. GRC's local partners, who work closely with garment suppliers in the three target locations, reported tangible examples of suppliers responding to evidence generated through the programme.

In some instances, repeated interaction with suppliers evolved from adversarial escalation through formal legal channels into more direct engagement around prevention and system strengthening. This included examples of suppliers seeking external support to improve wage management processes, requesting ongoing input when establishing new management procedures and seeking training of their factory staff and management.

"Following PILER's intervention in highlighting labour rights violations among suppliers exporting to the U.S., we established a direct liaison with these suppliers that created an alternative mechanism for addressing workplace grievances, alongside existing formal channels such as the Labour Department and Labour Courts. Over the years, this relationship has evolved into a collaborative partnership, with PILER working closely with suppliers to strengthen their management systems and workplace practices. Today, these suppliers proactively seek our support when developing new systems and improving their management processes."

- Abbas Haider, Pakistan Institute of Labour Education and Research (PILER)

In other cases, repeated legal action and favourable court decisions led suppliers to modify practices that had previously resulted in systematic rights violations, including improved compliance with worker entitlements and more consistent registration of workers for statutory benefits.

"A factory exporting to the U.S. used to terminate workers without giving them gratuity but after we filed a couple of cases against them and the court decided against them, their behaviour has changed and now all their workers are registered for gratuity. In another garments factory, we engaged the brands for negotiations and then the workers started getting gratuity."

- Khalid Mahmood, Labour Education Foundation (LEF)

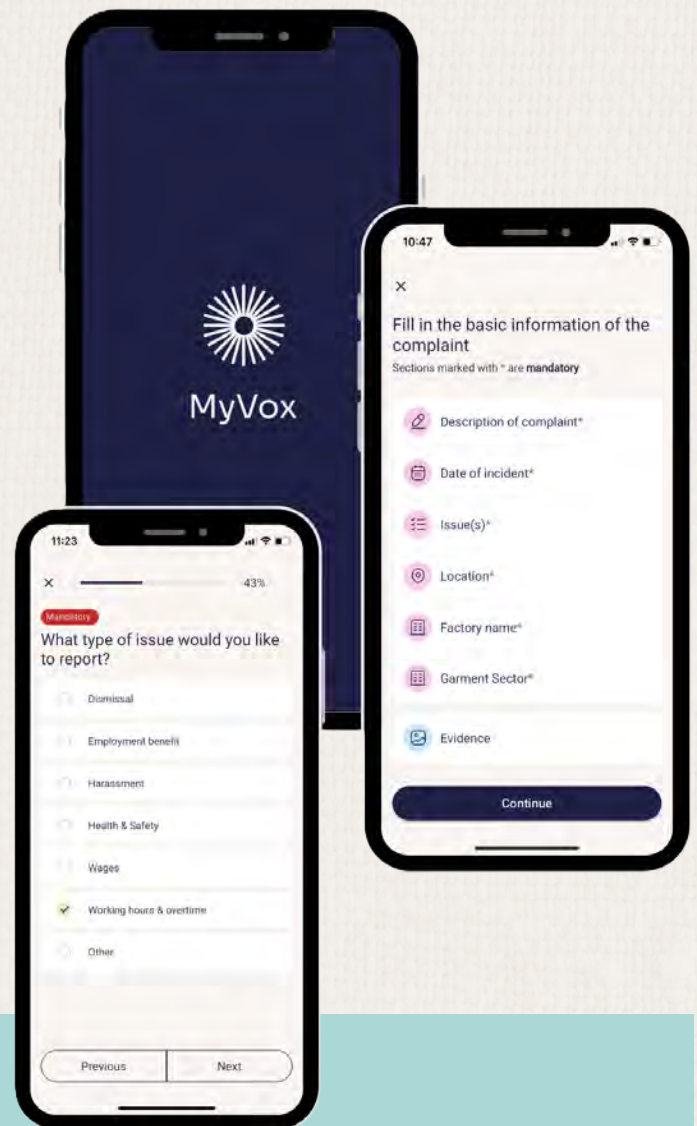
Local partners also observed signs of increasing responsiveness among suppliers, including the establishment of harassment committees, the introduction of internal reporting mechanisms and greater willingness to participate in multi-stakeholder spaces that include worker representation including signing of MoUs for management training on labour rights. While these developments do not in themselves demonstrate improved human rights outcomes, they suggest that community-generated evidence can encourage suppliers to adopt more structured and participatory approaches to managing human rights risks.

While a four-year timeframe is not enough to be able to fundamentally transform supplier behaviour across the sector, the evidence shows that **independent, locally generated information can contribute to gradual shifts in practice and relationships among suppliers.**

Engaging workers through digital technologies

Technology plays an important role in enabling CBM, but it should not be confused with CBM itself. Digital tools, including mobile and desktop applications such as [MyVox](#), SMS-based reporting systems, online surveys and other communication platforms, facilitate the collection, aggregation and analysis of information generated by affected rights-holders. Whatever the tool is, it is important that they are made available to the communities and fulfil the criteria of meaningful engagement as defined in the UNGPs.

Ultimately, their value lies not in the technology itself, but in their ability to support trusted, continuous and accessible engagement.¹⁴



The UN has recently highlighted the growing role of digital stakeholder engagement tools in supporting companies' human rights due diligence and remediation efforts.¹⁵ These tools can provide valuable on-the-ground insights from workers and communities, helping businesses identify risks, strengthen engagement, and establish more effective follow-up and remedy processes. The UN emphasises that technology should complement -not replace- meaningful stakeholder engagement, supplier dialogue, worker representation, and grievance mechanisms.

[MyVox](#) illustrates this principle in practice. Rather than functioning as a stand-alone reporting application, **it forms part of a broader CBM ecosystem that combines trusted local relationships, legal support and continuous stakeholder engagement.** In doing so, it helps translate rights-holder perspectives into actionable information that can strengthen multiple stages of the human rights' due diligence process.

4

How Community-Based Monitoring Strengthens Human Rights and Environmental Due Diligence Processes



By generating continuous rights-holder-informed information, facilitating meaningful stakeholder engagement, supporting access to remedy and providing ongoing feedback on the effectiveness of company responses, CBM has the potential to strengthen HREDD processes. In this sense, CBM should not be viewed merely as a monitoring tool but as a due diligence infrastructure that supports multiple stages of the HREDD process simultaneously.

These characteristics increasingly align with the expectations established under emerging mHREDD legislation. Legislation such as the CSDDD requires companies not only to identify risks but also to engage with affected stakeholders, implement preventive measures, monitor effectiveness, and provide remediation where adverse impacts occur. In practice, many of the core elements of effective due diligence are embedded within CBM.

The principal value of CBM does not lie in helping companies comply with a particular legislative instrument. Rather, it lies in strengthening the quality and effectiveness of HREDD itself. By generating continuous rights-holder-informed information, enabling meaningful stakeholder engagement, supporting access to remedy and improving the monitoring of company responses, CBM helps companies build more robust systems for identifying, preventing, mitigating and addressing adverse human rights impacts.

That these same features increasingly align with emerging mHREDD frameworks is a significant additional benefit, but it is a consequence of stronger HREDD rather than the primary objective of the approach.

How CBM Supports Compliance with the CSDDD

CSDDD Step	What the CSDDD requires	How CBM supports this in practice
Due Diligence Policy (Art. 7)	Adopt and implement a due diligence policy, including a code of conduct and processes for implementation.	Informs policy design with ground-level insights from rights-holders, ensuring policies reflect real risks and in loco conditions. Rights-holders involvement increases legitimacy and uptake.
Identify & Assess Impacts (Art. 8)	Identify actual and potential adverse human rights and environmental impacts across operations and value chains.	Provides continuous, rights-holder-informed information that strengthens the identification and assessment of actual adverse impacts and helps companies gain earlier visibility of emerging issues that may not be captured through periodic monitoring. (e.g. informal practices, hidden abuses).
Prioritisation of Impacts (Art. 9)	Prioritise impacts based on severity and likelihood where not all can be addressed at once.	Generates granular, real-time information, helping companies better understand the severity, scale and recurring nature of adverse impacts, supporting informed prioritisation where impacts cannot all be addressed simultaneously.

CSDDD Step	What the CSDDD requires	How CBM supports this in practice
Prevention of Potential Impacts (Art. 10)	Take appropriate measures to prevent or mitigate potential adverse impacts, including action plans.	Helps design targeted and context-specific prevention measures, based on direct input from affected rights-holders about root causes.
Bringing Actual Impacts to an End (Art. 11)	Take appropriate measures to end ongoing adverse impacts.	Enables earlier visibility of ongoing adverse impacts, enabling companies to intervene more quickly and implement corrective measures before harms worsen or become systemic, making remediation more effective, locally grounded and less costly.
Provide remediation in case of actual adverse impacts (Art. 12)	Provide remediation where actual adverse impacts have occurred.	Facilitates locally driven remediation, allowing issues to be resolved closer to the source, often faster and in a way that is trusted by rights-holders.
Stakeholder Engagement (Art. 13)	Engage meaningfully with stakeholders at specified stages of the due diligence process.	Facilitates continuous engagement with affected stakeholders throughout the due diligence process, enabling companies to incorporate rights-holder perspectives into risk identification, prevention, remediation and monitoring.
Complaints Mechanism (Art. 14)	Establish and maintain a notification and complaints procedure.	Acts as a trusted, accessible reporting channel, often overcoming barriers like fear of retaliation or lack of awareness that undermine traditional grievance mechanisms.
Monitoring Effectiveness (Art. 15)	Assess the effectiveness of due diligence measures using qualitative and quantitative indicators.	Provides ongoing feedback loops and real-time indicators, allowing companies to track whether measures are actually improving conditions on the ground.
Public Communication (Art. 16)	Communicate publicly on due diligence efforts and outcomes.	Strengthens reporting with credible, evidence-based data, enhancing transparency and reducing the risk of superficial or inaccurate disclosures.

While the EUFLR does not establish due diligence obligations, the Commission's recently published Guidelines for its implementation repeatedly recognise the value of worker-generated and community-generated information, for identifying forced labour in supply chains, especially when it comes to evidence gathering throughout the investigative process.

How CBM Supports Compliance with the EUFLR

EUFLR Guideline / Investigation Stage	What the EUFLR Guidelines recognise	How CBM supports this in practice
Collection of information (Section 4.4.2)	Competent authorities should consider information from civil society organisations, local communities, labour rights activists, trade unions, worker representatives, individual workers and alleged victims when assessing forced labour risks.	CBM provides structured, continuous and locally generated evidence from workers and communities, ensuring that investigations are informed by credible first-hand information rather than relying solely on company disclosures or audits.
Preliminary assessment (Section 4.5.1.1)	The Guidelines recognise that, alongside due diligence, worker-driven monitoring can be an effective approach for demonstrating that products were not made with forced labour.	CBM operationalises rights-holder-driven monitoring by enabling workers and community representatives to regularly identify, report and verify labour rights risks throughout the supply chain.
Evidence submitted by economic operators (Section 4.7.1)	Companies may provide evidence of stakeholder and rightsholder engagement, consultation with NGOs, trade unions and communities, grievance mechanisms, corrective action plans and due diligence efforts.	CBM generates documented evidence of ongoing stakeholder engagement and functioning grievance systems, demonstrating meaningful implementation rather than one-off consultation exercises.
Evidence on working conditions (Section 4.7.2)	Authorities may consider worker interviews, written testimonies, surveys by trade unions or worker representatives, and evidence of remediation and worker satisfaction.	CBM routinely produces these forms of evidence through worker surveys, interviews, community facilitators and continuous monitoring, offering a richer and more representative picture of workplace conditions.
Assessment of evidence (Section 4.8.1.1)	The Guidelines recognise reports from community-based grievance mechanisms, worker testimonies, surveys, and other worker-generated evidence as relevant in establishing violations. They also note that traditional social audits may not be credible where workers cannot speak freely.	CBM addresses many of the shortcomings of conventional audits by generating independent, continuous and worker-led evidence through trusted local mechanisms, particularly in high-risk environments where audits are less reliable.

5

How to Scale Up Community-Based Monitoring



Over four years of implementation, the programme in Pakistan has demonstrated the value that trusted, community-based structures can bring to HREDD, generating continuous rights-holder-informed information, strengthening meaningful stakeholder engagement, and facilitating access to remedy for workers.

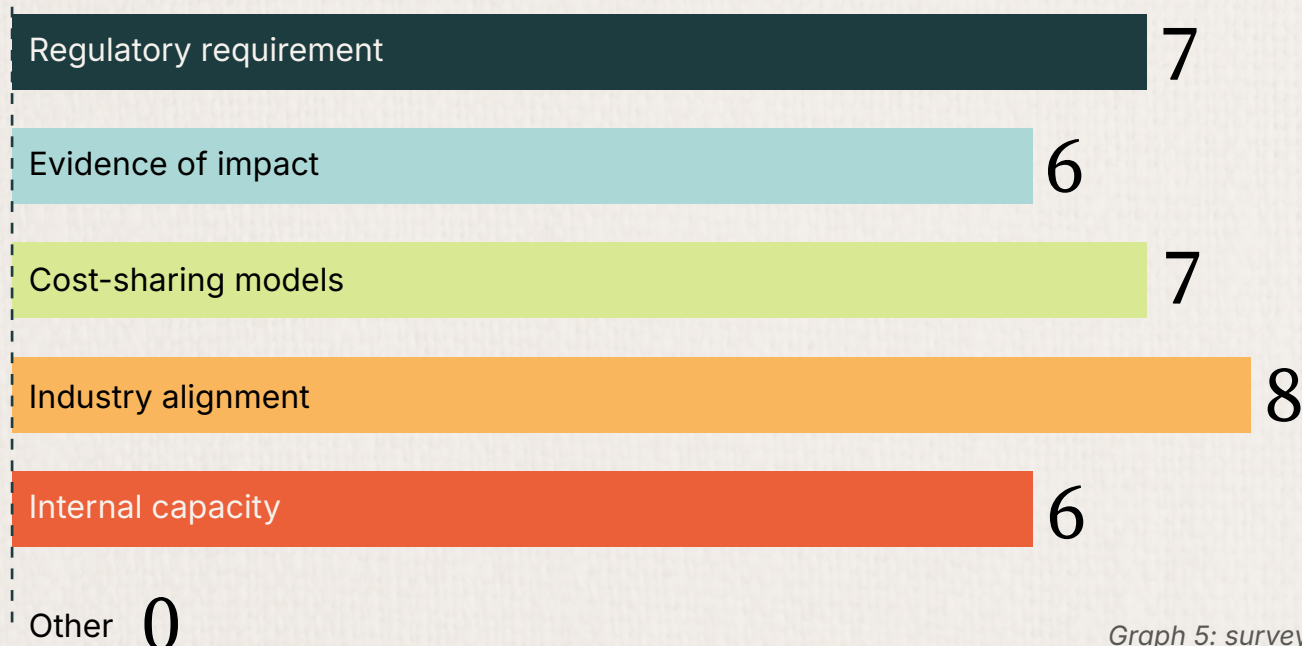
The programme has also highlighted the need to think innovatively about how it can be integrated into current HRDD practices, and therefore sustainably scaled. Moving from a project-based intervention to an approach that companies take to HRDD requires more than replicating centres, hiring worker monitors or expanding the use of MyVox. It requires creating an institutional, operational and financial understanding of the ways in which community-based structures must play a central role in HRDD processes, supporting to identify risks and feed into corporate due diligence processes to inform decisions and responses, all the while remaining independent and trusted by rights-holders.

CBM offers companies an opportunity to build on existing and trusted community

structures in sourcing contexts, thereby strengthening their access to rights-holder perspectives and being enabled to connect current information about risks with HREDD decision-making. However, scaling CBM depends on maintaining the characteristics of the model such as the independence of local structures, the ability to build trust among rights-holders over time, accessibility, appropriate safeguards and sustained engagement over time. These considerations raise practical questions around governance, geographic coverage, consistency of implementation, coordination between companies and suppliers, and long-term financing.

Findings from GRC's engagement with brands illustrate both the interest in, and some of the practical conditions for, broader adoption. Survey respondents identified **industry alignment (61%)** and **collective approaches (53%)** among the principal factors that could enable greater adoption of CBM. This indicates that collective action across the sector is equally important to create a level playing field and avoid competitive disadvantages for individual brands.¹⁶

What would enable your company to adopt/scale up CBM?



Graph 5: survey responses

Drawing on the experience of the Pakistan programme, **three interrelated conditions** emerge as particularly important for moving CBM from a pilot approach towards sustainable integration and scale:

1. Institutionalisation

Establishing clear pathways through which CBM-generated information and rights-holder perspectives can inform companies' identification and assessment of impacts, prevention and corrective action, remediation and monitoring of effectiveness, while safeguarding the independence of community-based structures.

2. Trusted local implementation partners

Investing in organizations that are embedded within affected communities, trusted by rights-holders and equipped with the human rights, safeguarding, monitoring and technical capabilities necessary to operate CBM effectively.

3. Sustainable financing

Moving beyond short-term project funding and audit funding towards predictable, longer-term financing models for collective rights-holder centred approaches.

These conditions are closely interconnected. Institutional integration creates demand for CBM-generated information and engagement; trusted local partners provide the relationships and expertise on which the model depends; and sustainable financing allows those structures to operate continuously and retain the long-term presence necessary to build trust.

Together, they provide a basis for considering how the lessons from the Pakistan pilot could inform broader application of CBM across sourcing contexts and, potentially, other areas of HREDD.

5.1 Institutionalisation

The first requirement is the institutional integration of CBM into companies' HREDD processes. For CBM to realise its full potential, it must evolve from a civil society-led intervention into a trusted and scalable part of the infrastructure through which companies identify, assess, address and monitor adverse human rights impacts. Rather than operating as a stand-alone project, CBM should become part of the infrastructure through which companies identify, assess, prevent, mitigate and monitor adverse human rights impacts across their operations and value chains.

This requires companies to formally recognise the role of trusted local actors (including civil society organisations, trade unions and other community-based organisations) as contributors to their due diligence processes. Integrating CBM into risk assessment cycles, responsible sourcing strategies and remediation systems would enable companies to complement traditional monitoring approaches with continuous, rights-holder-informed information while strengthening meaningful stakeholder engagement throughout the HREDD cycle.

"Brands should require suppliers through contractual agreements to establish bilateral committees capable of resolving issues promptly at the factory level, and to create area-level or provincial-level multi-committees comprising suppliers, brands, workers, and CSOs. Such a tiered system would position CBM as a first-tier mechanism for community-level identification and initial dialogue, feeding into formal internal mechanisms before external legal escalation".

– Zehra Khan,
Home Based Women Workers
Federation (HBWWF)

As previously mentioned, the expansion of mHREDD legislation provides an opportunity to accelerate the adoption of CBM. Although instruments such as the CSDDD and other emerging HREDD frameworks do not prescribe specific monitoring methodologies, they increasingly require companies to strengthen stakeholder engagement, improve the identification and assessment of adverse impacts, monitor the effectiveness of due diligence measures and facilitate access to remedy. As demonstrated in Chapter 4, CBM directly supports each of these functions.

Where CBM relies on digital tools, these should also be designed and implemented in a manner consistent with international human rights standards. The United Nations has similarly recognised the growing role of digital engagement tools in supporting meaningful stakeholder engagement.



Information, Education and Communication posters developed for awareness raising at Legal Aid Centres

The UN sets out **12 guiding questions** to help companies and tool providers assess whether a specific digital tool is appropriate, effective, and sufficiently robust to support meaningful stakeholder engagement in line with human rights due diligence expectations. The questions examine issues such as human rights alignment, worker participation, accessibility, safety, privacy, remedy, and the tool's ability to complement existing engagement and grievance mechanisms.

1. How does the tool provider demonstrate its approach to human rights?
2. To what extent is specialist human rights advice available and implemented?
3. How can the tool support meaningful stakeholder engagement under the UN Guiding Principles?
4. How can the tool support effective remedy for adverse human rights impacts?
5. To what extent are workers and representatives involved in design, implementation and evaluation?
6. How does the tool complement trade unions and worker organisations?
7. What has been done to ensure the tool is safe for workers?
8. How does the tool ensure all relevant workers can participate?
9. To what extent does the tool offer workers choice in how they engage?
10. How does the tool ensure human intervention where needed?
11. How does the tool safeguard worker privacy?
12. Can processes producing decisions or assessments be scrutinised and verified?

→ To see how GRC's CBM tool checks against these questions, refer to [Annex 1](#).

5.2 Trusted Local Implementation Partners

Effective CBM depends on trusted local organisations that possess both strong community relationships and the technical capacity to facilitate safe, reliable and meaningful engagement. These organisations play a critical role in building awareness of human and labour rights, facilitating safe reporting channels, and ensuring that rights-holders understand how monitoring and remediation processes work. However, trust alone is not sufficient. As evidenced by GRC local partners, in most cases, workers do not report grievances during their first interaction. They usually take time to familiarise themselves with the paralegal team, understand the purpose of the programme, and build confidence. Once trust is developed, they are more willing to share their problems and seek support.

"Trust in the broader grievance redress system remains limited because workers often see formal mechanisms as slow, complicated, costly, and sometimes influenced by employers. Therefore, Legal Aid Centres play a bridging role. They help workers understand their rights, assess their options, prepare documentation, and approach the relevant legal forum"

– Khalid Mahmood, Labour Education Foundation (LEF)

However, local partners must also possess the technical expertise required to operate robust monitoring systems, including collecting and verifying data, safeguarding confidentiality, managing digital reporting tools, analysing trends, and facilitating access to remediation.

To protect worker safety and data integrity, the programme **incorporated specific safeguards:**

- * All paralegal interactions were conducted off-site, outside of factory premises, and treated as confidential.
- * Workers were informed of how their data would be used and can withdraw at any point. Workers who decided to report violations were not forced to seek legal remedy after they were informed on available channels.
- * MyVox data is anonymised before being shared with brands or suppliers, and confidentiality of workers is prioritised across all processes, both locally and during outreach with international brands.
- * Interviewers working at the Legal Aid Centres were adequately trained on how to conduct interviews and to cope with psychological support.

Strong implementation partners, therefore, act as both trusted intermediaries and technical operators, converting rights-holders' experiences into reliable, actionable evidence that companies can confidently integrate into their HREDD processes. Investing in local capacity is essential to ensure that CBM generates credible, consistent, and comparable data over time.

5.3 Financial Sustainability

CBM requires predictable, multi-year funding rather than short-term, project-based support. Shared financing models, industry collaboration, and integration into companies' ongoing HREDD budgets can help ensure that CBM becomes a sustained feature of responsible sourcing, enabling continuous monitoring, meaningful community engagement, and lasting impact.

Long-term funding remains one of the most significant barriers to scaling CBM beyond geographical limitations. Building trust, training paralegals, maintaining community spaces and ensuring ongoing data collection require sustained investment over time. As one local partner noted: Local partners consistently identified project-based, time-bound funding as a fundamental barrier to scaling.

"[Community based monitoring] should not become seasonal or dependent solely on short-term donor projects; sustainable engagement and institutional continuity are essential for meaningful impact."

- Nasir Mansoor, National Trade Union Federation (NTUF)

GRC's experience in Pakistan also highlights the scale challenge. While Legal Aid Centres and worker hubs have successfully generated worker-reported data and supported remediation, their geographic reach remains limited. Large industrial areas and significant portions of the garment workforce remain outside the coverage of existing monitoring structures.

This scaling is particularly important given the complexity of global supply chains, which often span multiple countries and involve thousands of rights-holders who remain beyond the reach of traditional monitoring systems. **Potential funding models include:**

- ✳ Collective approaches, such as multi-stakeholder funding arrangements involving brands, suppliers, civil society organisations, and development partners.
- ✳ Shared financing among brands sourcing from the same region (as demonstrated by suppliers that proactively request training and advisory services).
- ✳ Contributions to area-level committees rather than single-donor grants. When brands and suppliers face sufficient regulatory or reputational pressure, they begin to internalise costs that were previously borne entirely by donor-funded CSOs.

Such approaches are consistent with the increasing emphasis on collaboration within emerging HREDD frameworks. They also recognise that many human rights risks are systemic and cannot be addressed effectively through fragmented company responses alone.

Ultimately, scaling CBM is not simply a question of expanding monitoring activities. It requires embedding rights-holder informed approaches within the governance, partnerships and financing arrangements that underpin effective HREDD. Only then can CBM evolve from a successful project methodology into a sustainable component of responsible business conduct.

“Karachi alone accounts for approximately 50 percent of Pakistan’s garment sector, yet the limited number of offices [12] cannot adequately serve the scale of workers requiring assistance.”

– Nasir Mansoor, National Trade Union Federation (NTUF)



Conclusion

This report has shown that CBM has the potential to strengthen multiple stages of the HREDD process. Drawing on the insights from GRC's programme in Pakistan, it demonstrates how continuous, rights-holder informed engagement can improve companies' understanding of actual and potential adverse human rights impacts, facilitate earlier intervention, strengthen access to remedy, and support more meaningful stakeholder engagement. While the Pakistan programme focuses on labour rights in the garment sector, the findings suggest that the value of CBM extends beyond this particular context.

Furthermore, CBM should not be understood as another standalone monitoring tool, nor does it replace audits, grievance mechanisms or other HREDD tools, it addresses important gaps that these tools often struggle to overcome. The programme suggests that embedding trusted community actors, independent reporting channels, and locally grounded remediation within supply chain monitoring can improve both the quality of information available to companies and the effectiveness of their responses. In doing so, it helps address several well-recognised limitations of traditional compliance tools, including limited visibility between audit cycles, barriers to stakeholder participation, and difficulties identifying adverse impacts that remain hidden from conventional monitoring approaches.

The report also demonstrates that the benefits of CBM extend beyond risk identification. By linking monitoring with trusted local support structures and pathways

to remedy, CBM enables companies not only to understand adverse impacts more effectively but also to respond to them in ways that are timelier, context-sensitive and accessible to affected rights-holders. In this respect, the programme illustrates the importance of viewing monitoring, stakeholder engagement and remediation as mutually reinforcing elements of effective HREDD rather than as separate corporate functions.

At the same time, the experience in Pakistan highlights that scaling CBM will require long-term investment, collaboration between companies, suppliers and civil society organisations, and recognition of community-based approaches within corporate due diligence processes. Sustainable financing, strong local implementation partners, and integration into existing responsible sourcing practices will be essential to maximise the model's potential.

As expectations around HREDD processes continue to evolve, companies are increasingly required to demonstrate not only that they have processes in place, but that those processes are capable of identifying adverse impacts, engaging affected stakeholders and contributing to effective remediation.

The findings presented in this report suggest that CBM provides a practical means of supporting these objectives. Its principal value lies not simply in helping companies meet emerging regulatory expectations, but in strengthening the quality, credibility and effectiveness of HREDD itself.

Key Takeaways for Companies

CBM is a methodology that strengthens HREDD. Rather than functioning solely as a monitoring tool, CBM supports multiple stages of the HREDD cycle by generating continuous, rights-holder-informed information, facilitating meaningful stakeholder engagement, supporting access to remedy, and strengthening monitoring of effectiveness.

1

Meaningful stakeholder engagement is central to effective HREDD. Trusted community-based structures enable companies to engage affected rights-holders more continuously and safely, particularly where barriers such as fear of retaliation, limited trust or weak worker representation constrain direct engagement.

2

While traditional monitoring tools such as audits and grievance mechanisms remain important, they often lack continuous visibility and fail to capture conditions on the ground. **CBM complements these tools by generating ongoing insights from affected rights-holders,** helping companies identify actual adverse impacts earlier, better understand systemic patterns, and respond more effectively.

3

Scaling up CBM enables companies to **move beyond fragmented, project-based approaches towards more effective, continuous, and rights-holders centred due diligence processes** that generate reliable supply chain intelligence, strengthen risk management, and improve outcomes for both rights-holders and businesses.

4

CBM should be understood not only as a monitoring tool but **as HREDD infrastructure that strengthens companies' ability to demonstrate compliance with emerging legislation**, including frameworks such as the CSDDD and EU Forced Labour Regulation.

5

To achieve sustainable scale, CBM requires **industry alignment and collective action, integration into companies' HREDD processes, trusted and technically capable local implementation partners, and predictable long-term financing models** that allow monitoring structures to operate beyond short-term initiatives.

6

Workers' Testimonies



Scan or click the QR code to watch the workers' testimonies.

Annex I

Question	Summary of What It Assesses	MyVox Assessment
1. How does the tool provider demonstrate its approach to human rights?	Whether the provider embeds human rights commitments, responsible technology practices, privacy safeguards, and HRDD principles into its own operations.	MyVox was developed to support HRDD efforts by facilitating continuous, rights-holder-informed monitoring. It is embedded within a broader community-based monitoring model that promotes meaningful stakeholder engagement, strengthens access to remedy, and incorporates safeguards relating to confidentiality, informed participation and data protection. Rather than functioning as a stand-alone technology, MyVox supports human rights-centred due diligence processes through trusted local implementation partners.
2. To what extent is specialist human rights advice available and implemented?	Whether human rights expertise informs tool design, deployment, and interpretation, including expertise on vulnerable groups, discrimination, and gender.	MyVox was developed by GRC in collaboration with civil society organisations, trade unions and labour rights experts with extensive experience in business and human rights, labour rights and access to remedy. Ongoing engagement with local partners ensures that the platform continues to reflect the realities faced by workers, including vulnerable groups such as women workers and workers in precarious forms of employment.
3. How can the tool support meaningful stakeholder engagement under the UN Guiding Principles?	Whether the tool enables ongoing dialogue, identifies issues beyond traditional monitoring, supports follow-up, and integrates worker insights into HRDD processes.	MyVox supports continuous worker engagement by collecting worker perspectives and generating information that companies and suppliers can use to identify risks and improve labour practices. It complements direct stakeholder engagement by enabling companies to engage both workers and suppliers based on worker-informed data, rather than relying solely on periodic consultations or audits.
4. How can the tool support effective remedy for adverse human rights impacts?	Whether the tool supports grievance identification, case handling, remediation, feedback loops, and learning from complaints.	MyVox supports the early identification of workplace issues and facilitates referral into appropriate remediation pathways through local Legal Aid Centres. By documenting complaints, supporting follow-up and enabling trend analysis, it helps strengthen access to remedy while generating insights that can inform future prevention and corrective action.
5. To what extent are workers and representatives involved in design, implementation and evaluation?	Whether workers influence tool design, usability, accessibility, and ongoing improvements.	The design of MyVox was conducted with the constant feedback from GRC's local partners, i.e. civil society and worker organisations. There are also several rounds of feedback with paralegals responsible to meet with workers and record their complaints. Overall, workers representatives were involved in tool design, testing, and evaluation.

6. How does the tool complement trade unions and worker organisations?	Whether the tool strengthens rather than replaces collective worker representation and social dialogue.	MyVox can provide additional worker-generated information that may support unions, worker representatives, and social dialogue processes. The ongoing communication with local partners allows GRC to identify the needs of unions and explore ways to complement their efforts (rather than replacing them).
7. What has been done to ensure the tool is safe for workers?	Whether risks of retaliation, surveillance, misuse, or harm are assessed and mitigated through safeguards.	The programme incorporates measures to ensure confidential, safe, and informed worker participation. Paralegal consultations take place off-site and confidentially, workers are informed about data use and their rights to withdraw or choose their preferred remedy pathway, and MyVox data is anonymised before being shared with brands or suppliers. Interviewers receive training on ethical interviewing practices and providing appropriate support when workers disclose sensitive experiences.
8. How does the tool ensure all relevant workers can participate?	Whether the tool addresses barriers related to language, literacy, gender, migration status, vulnerability, and digital access.	Legal Aid Centres and the MyVox reporting process are open to all workers without discrimination. The use of local paralegals reduces language and literacy barriers by allowing workers to communicate in their preferred language. Community-based structures, including Women's Cafés, provide safe and accessible spaces for women workers and other groups who may face barriers to using workplace-based reporting channels.
9. To what extent does the tool offer workers choice in how they engage?	Whether workers can choose different engagement methods, including anonymous reporting, two-way communication, or human interaction.	Workers can choose whether to engage with the programme and whether to pursue available remediation pathways after receiving legal information and advice. Engagement is based on direct interaction with trained paralegals rather than digital self-reporting, allowing workers to ask questions, receive support and decide how they wish to proceed.
10. How does the tool ensure human intervention where needed?	Whether automated processes are complemented by human review, escalation, interpretation, and support for sensitive cases.	MyVox does not rely on automated decision-making. Trained paralegals collect and verify information through interviews with workers before entering cases into the platform. Dedicated data analysts conduct quality assurance and review aggregated information, while sensitive cases are supported through human assessment and referral by local implementation partners.
11. How does the tool safeguard worker privacy?	Whether personal data collection, storage, consent, encryption, and access controls protect workers from harm.	Privacy and confidentiality are central features of the programme. Personally identifiable information is protected throughout data collection and management processes, workers are informed about the use of their information, and data shared externally are anonymised to minimise risks of retaliation or identification.
12. Can processes producing decisions or assessments be scrutinised and verified?	Whether data analysis, risk scoring, categorisation, and recommendations are transparent and can be challenged or reviewed.	MyVox does not use opaque automated risk-scoring or decision-making systems. Information is collected through documented interviews conducted by trained paralegals, reviewed through human quality assurance processes and analysed transparently using predefined categories of human rights and labour rights issues. The underlying evidence can therefore be reviewed, verified and challenged where appropriate.

Endnotes

1 In sectors such as healthcare, community-led monitoring has helped uncover failures in service delivery, strengthened accountability mechanisms, and improved responsiveness from authorities and providers. See, for instance, Sultana P, Abeyasekera S. Effectiveness of participatory planning for community management of fisheries in Bangladesh. *J Environ Manage.* 2008 Jan; 86(1):201-13. doi: 10.1016/j.jenvman.2006.12.027. Epub 2007 Feb 8. PMID: 17291678. <https://pubmed.ncbi.nlm.nih.gov/17291678/>.

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7 Although CBM has broad applicability, its use in labour rights and supply chain contexts has primarily focused on strengthening worker participation, improving visibility of workplace conditions and facilitating access to remedy. The following initiatives illustrate how community-based and participatory approaches have been adapted to different objectives and institutional settings:

- The International Labour Organization has applied community-based approaches in different settings, including child labour monitoring in Bangladesh and, through its Better Work programme, worker engagement and social dialogue to improve labour standards, occupational safety and health, and worker-management relations in Jordan's garment sector.
- GIZ has used community-based approaches to strengthen women's access to justice in Bangladesh by building the capacity of local dispute resolvers, promoting gender-sensitive dispute resolution mechanisms, and improving coordination between community-based and formal justice institutions.
- The Fair Labor Association incorporates worker voice through its third-party complaint mechanism, which enables workers, trade unions, civil society organisations, and other stakeholders to report labour rights violations and trigger independent investigations and remediation.
- Similarly, the International Accord for Health and Safety in the Garment and Textile Industry empowers workers to report workplace health and safety concerns directly through legally binding grievance mechanisms, although these rely less on community engagement than on accessible reporting channels.
- FEMNET and its partners have developed one of the most comprehensive CBM models through the integration of worker-based monitoring and community-based monitoring in Bangladesh. Workers collect information on wages and labour conditions, while surrounding

communities document environmental impacts associated with textile production. The resulting evidence informs trade union advocacy, public authorities, and companies' human rights due diligence processes.

- The RMG Sustainability Council applies a tripartite governance model that brings together industry, international brands, and trade unions to improve workplace safety and labour standards across Bangladesh's garment sector, placing worker participation at the centre of factory safety programmes.

- Finally, the Social & Labour Convergence Program (SLCP), through its Converged Assessment Framework, harmonises social and labour assessments across supply chains, reducing audit duplication through shared facility assessments and independent verification. While participatory in its multi-stakeholder governance, it is less community-driven than other examples, as data are collected primarily by facilities rather than workers or surrounding communities.

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15 United Nations Human Rights Council. (2026). Using Digital Tools for Stakeholder Engagement: Aligning Corporate Practice with the Guiding Principles on Business and Human Rights (UN Doc. A/HRC/62/25). <https://docs.un.org/en/A/HRC/62/25>.

16 Findings from GRC's engagement with brands illustrate both the interest in, and some of the practical conditions for, broader adoption. Survey respondents identified industry alignment (61%) and collective approaches (53%) among the principal factors that could enable greater adoption of CBM. This indicates that collective action across the sector is equally important to create a level playing field and avoid competitive disadvantages for individual brands.

17 Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (CSDDD, Article 3(1)(n).

18 CSDDD, Recital 65.

19 The Directive requires that companies ensure participants are not subject to "retaliation or retribution, including by maintaining confidentiality or anonymity".

20 CSDDD, Article 13.



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