UNITED NATIONS
HUMAN RIGHTS
OFFICE OF THE HIGH COMMISSIONER

Digital Tools for Stakeholder Engagement with Workers

12 Questions to Ask and Issues to Explore

Guidance for aligning corporate practice with the UN Guiding Principles on Business and Human Rights

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Digital tools are transforming how businesses engage with rights holders – offering the potential to enhance the scale, inclusivity and responsiveness of stakeholder engagement efforts, but also raising risks and limitations around accessibility, accountability, and the quality and safety of participation. So how do you tell whether a tool genuinely supports meaningful, rights-respecting engagement?

In its report *Using digital tools for stakeholder engagement: aligning corporate practice with the Guiding Principles on Business and Human Rights* OHCHR identifies key considerations for ensuring that the use of such tools aligns corporate practice with the Guiding Principles and provides practical guidance to support assessments of the suitability and limitations of stakeholder engagement tools dedicated to workers in value chains. This guidance, which draws upon promising practices for such tools, has been distilled into 12 main questions to ask of those developing a digital stakeholder engagement tool, complemented by a number of suggested issues for further exploration under each question. For the authoritative version of this guidance, which contains important caveats and nuance, please see the full report.

How to use it:

The guidance should be interpreted and applied flexibly. A tool need not satisfy every point to be valuable – each question simply helps you weigh its strengths, limitations and risks. Tailor the questions to your own context.

Useful for:

- **Tool clients (e.g., companies)**
- **Tool providers**
- **Regulators**
- **Unions and worker representatives**
- **Civil society**

Question 01

How does the tool provider demonstrate its approach to human rights?

Potential issues for further exploration:

- How human rights are addressed in the tool providers' own mission statements, and how these commitments are realized in practice;
- The tool providers' policies and practices to prevent the misuse of technologies, especially in ways that could harm human rights;
- Policies and practices relevant to rights-respecting stakeholder engagement, such as data protection and privacy, cybersecurity and conflicts of interest;
- The extent to which the tool provider has integrated key Guiding Principles on Business and Human Rights concepts (e.g. concerning human rights due diligence or grievance redress) in its internal management systems.

Question 02

To what extent is specialist human rights advice available to and implemented by the tool provider?

Potential issues for further exploration:

- The extent to which such expertise is available in-house;
- Criteria for selecting human rights experts (e.g. geographical, sectoral or theme-based expertise);
- Efforts made to ensure that those at risk of vulnerability or marginalization are properly represented;
- Examples of how human rights advice and issues (e.g. on discrimination and equality, including in relation to gender) have been taken into account in a product or service.

Question 03

How can this tool support meaningful stakeholder engagement, as envisaged in the Guiding Principles on Business and Human Rights?

Potential issues for further exploration:

- The extent to which the tool can yield insights into human rights issues not available from other sources;
- The extent to which the tool can support ongoing, continuous engagement rather than merely "one-off" exercises;
- How the tool can complement and enhance engagement efforts through other means (e.g. through mechanisms maintained by suppliers or union-led processes);
- How the tool can be integrated into a tool client's broader human rights due diligence strategies, including regarding prioritization;
- Whether tool clients will have access to sufficient information for the purposes of any follow-up actions or dialogue;
- Efforts made to identify and address possible barriers to representation and participation by certain stakeholder groups (see question 8);
- Sources of possible bias in any decision-making processes supported by the tool (e.g. regarding the categorization of issues or escalation) (see question 12);
- The track record of the tool in supporting meaningful stakeholder engagement in other settings, including the extent to which it has been reviewed and updated in response to lessons learned.

Question 04

How can this tool support the delivery of effective remedy for adverse human rights impacts detected in the value chain?

Potential issues for further exploration:

- Levels of uptake by users over time and any relevant factors affecting use;
- Information on the types of grievances raised through the tool and how these have been resolved in practice;
- How the tool can support the resolution of grievances at a collective level;
- Feedback from users (e.g. regarding satisfaction or trust levels) and other interested parties (e.g. unions);
- The success of outreach activities to ensure awareness of the tool and its capabilities, and lessons learned;
- Other issues or challenges that may have arisen during implementation and how these tools have been updated and improved over time;
- Options for collecting feedback on stakeholder experiences with grievance mechanisms so that problems can be properly analysed and rectified;
- Options for ensuring that the substantive outcomes of these processes actually meet the needs of those affected;
- Options to support the continuous learning of mechanisms.

Question 05

To what extent are workers and their representatives involved in the design, implementation and evaluation of the tool?

Potential issues for further exploration:

- The degree of worker input into the design, testing, deployment and updating of the tool, how this input was sought and obtained and at what stages;
- How worker input influenced the design of the tool or adjustments to it;
- What other stakeholder groups were consulted (e.g. credible, independent expert resources, including human rights defenders and others from civil society), where direct consultation with workers or their representatives was not possible.

Question 06

How do you see the tool as complementing the role of trade unions and other workers' organizations?

Potential issues for further exploration:

- The extent to which unions and other workers' organizations were involved in the design, testing, deployment and updating of the tool, the nature of that involvement and any feedback that these groups may have provided;
- Opportunities for raising awareness through the tool and related activities of the support that is available through unions and other workers' organizations and how to access it;
- Opportunities for ongoing collaboration with unions and other workers organizations, for instance as part of reviews or upgrades of the tool;
- The alignment of the tool with goals and principles of effective social dialogue between Governments, employers and workers' organizations.

Question 07

What has been done to ensure that the tool is safe for workers to use?

Potential issues for further exploration:

- The risk-assessment activities carried out by the tool provider, including the methodologies used, the findings that emerged, and any resulting technical adjustments or deployment recommendations;
- The extent to which such assessments took into account contextual and structural risk factors, including conflict, political conditions (such as civil unrest or repression), risks of surveillance and the legal and political environment in which data are collected and stored;
- The extent to which relevant stakeholders, including workers and relevant local actors, such as employers, unions and law enforcement agencies, were consulted as part of those assessments;
- The factors that may place certain groups of workers (e.g. women, LGBTIQ+ people or migrant workers) at heightened risk of harm, including risks arising from the use of the tool itself;
- The safeguards in place to protect workers' privacy and security, including the use of encryption, measures to guarantee anonymity where necessary, and protections against identification, profiling or indirect targeting (including through patterns of complaints or behavioural analysis);
- The extent to which local actors (such as employers, unions and law enforcement agencies) can support the safe deployment of the tool, and the safeguards to ensure that such involvement does not create additional risks;
- The protections in place to ensure that data breaches or governmental access requests do not result in harm to workers (see question 11) and, where appropriate, the extent of transparency regarding the number and nature of such requests.

Question 08

How does the tool ensure that all workers who should be consulted are able to be heard and understood?

Potential issues for further exploration:

- Innovations and strategies for fostering inclusivity;
- Features or adjustments made to help to reduce the barriers to participation that may exist for people who may be at risk of vulnerability or marginalization;
- How the tool can be tailored to different linguistic and cultural backgrounds;
- Features to enable participation by those who may have low literacy or digital literacy;
- Measures (e.g. in the form of awareness-raising campaigns or training) that ensure the degree and type of participation that is needed;
- How power imbalances and dynamics (e.g. in specific work settings) that affect people's willingness to participate in stakeholder engagement exercises can be addressed;
- Any lessons learned from pilot activities and past practice;
- The extent to which gestures of appreciation (e.g. tokens to purchase goods or services, or financial compensation for the time and effort involved in supplying information) could be helpful in broadening participation.

Question 09

To what extent does the tool offer choice to workers about how they engage?

Potential issues for further exploration:

- How the tool provider knows which choices workers might prefer (or need) in different circumstances;
- The features and systems that have been put in place to ensure that, if human involvement is requested or needed, it is swiftly provided (see question 10);
- How workers can be confident that they are not limited to engaging (or not forced to engage) with relevant business actors solely through the stakeholder engagement tool.

Question 10

How does the tool ensure human intervention where needed?

Potential issues for further exploration:

- Where they see human oversight and intervention as important and why (e.g. for quality control, for ensuring the safety of workers or for sense-checking findings);
- The issues or scenarios that will trigger human intervention (e.g. situations involving serious human rights abuse, complex ethical issues or disputed versions of events) and how this takes place;
- The processes (e.g. research, stakeholder consultation, pilot projects or evaluation) that were undertaken to determine the appropriate level of autonomy for artificial intelligence-driven processes and the points at which human oversight and intervention would be needed;
- Arrangements for periodic review of key decisions and design features (e.g. the delineation between human responsibilities and automated functions and the rules and systems for maintaining this, such as thresholds and criteria for escalation from an automated process to a human);
- The capacity of human agents to understand, and correctly analyse and respond to, human rights issues, and the availability of suitable sources of support;
- Arrangements for ensuring that the privacy of workers participating through the tool is properly protected (see question 11).

Question 11

How does the tool safeguard the privacy of workers?

Potential issues for further exploration:

- End-to-end encryption to ensure protection of data;
- Features to avoid overcollection of personal data;
- Features to ensure destruction of personal data once there is no longer a reasonable case for keeping them;
- Ways to ensure that workers give their free and informed consent to data collection and handling, based on clear information about how sensitive personal data will be stored and used, and taking account of power imbalances that exist between workers and employers;
- Arrangements for ensuring strict adherence to conditions for workers' consent and that information is never used for purposes other than those for which consent was given;
- How actions relating to data collection and handling are documented and who will have access to this information;
- Systems to enable people to lodge complaints if they believe that their privacy and data-protection rights have been breached and to request corrections to or deletions of data.

Question 12

Can processes that produce decisions or assessments be properly scrutinized and verified?

Potential issues for further exploration:

- The key data sources used to augment or to help to contextualize the information and insights gathered from processes supported by the tool, and the adequacy and completeness of those data for such purposes;
- Ways to ensure comparability of data collected through the tool, across different processes and stakeholder engagement exercises, and over time;
- Efforts to ensure explainability and interpretability of artificial intelligence-powered processes and opportunities to enhance this;
- The use of algorithms (e.g. for searching and sorting data, simulations, modelling and forecasting) and the assumptions on which these are based;
- The possibility that incomplete, outdated or inaccurate data, or flaws in underlying assumptions, might be reinforcing unfairness or bias towards different groups of people (e.g. women, LGBTIQ+ people, migrant workers, and other groups at risk of vulnerability and marginalization) and the tool provider's efforts to detect and address this;
- Measures needed to align tools used for addressing grievances with the effectiveness criteria laid out in principle 31 of the Guiding Principles on Business and Human Rights;
- The means through which people might wish to challenge the outcomes of an information-gathering or engagement process supported by a tool (or any underlying data, assumptions or methodologies) and the information and other resources that would be needed to make this possible.

For detailed guidance, please read the full report.