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From Grievance to Meaningful Remedy

Evaluating the Effectiveness of Grievance Mechanisms and Remedy Ecosystem:
Amader Kotha Helpline in Bangladesh's Ready-Made Garment Sector

Executive Summary

From Grievance to Meaningful Remedy

Evaluating the Effectiveness of Grievance Mechanisms and Remedy Ecosystem: Amader Kotha Helpline in Bangladesh’s Ready-Made Garment Sector



Primark, The Remedy Project, and Amader Kotha Helpline® (**Helpline**) collaborated to evaluate the Helpline's effectiveness as a third-party grievance mechanism (**GM**) in Bangladesh's ready-made garment sector (**Evaluation**).

Companies are expected to establish or participate in GMs as a core tenet of the access to remedy pillar of the United Nations Guiding Principles on Business and Human Rights (**UNGPs**).

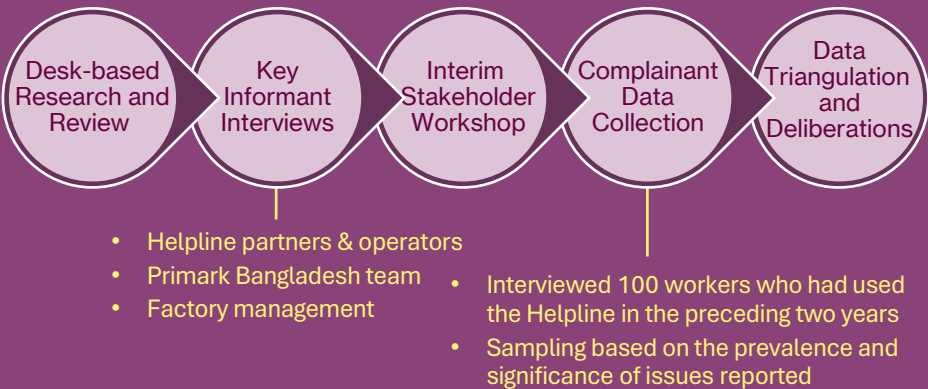
Led by a commitment to responsible sourcing and a push for fair and safe working conditions for workers in its supply chain, GMs are a critical component of Primark’s human rights due diligence (**HRDD**) approach. Despite widespread recognition of GMs being an essential element of HRDD, a fundamental gap remains in how effectiveness is understood and assessed. To help address this gap, Primark’s Ethical Trade and Environmental Sustainability Team initiated this Evaluation in April 2024.

Primark has a long-standing partnership with the Helpline, as part of its Social Impact initiatives in Bangladesh. Established in July 2014, the Amader Kotha Helpline (Bangla for “Our Voice”) provides workers in Bangladesh's ready-made garment (**RMG**) sector with an independent channel to raise safety and labour-related concerns in the workplace. The Helpline is operated through collaboration among Phulki, Clear Voice/The Cahn Group, and LRQA.

This Evaluation brought together independent perspectives from subject matter experts, as well as operational experience and on-the-ground insights from the Helpline, brands, factories and in particular, workers, as the primary beneficiaries of the Helpline and affected rightsholders in the remediation process.

A co-learning and collaborative process

Co-creation, collaboration, and shared learning are at the heart of this Evaluation. Through continuous dialogue, Primark, the Helpline, and The Remedy Project co-created the Evaluation framework, as well as the processes and approaches for data collection and triangulation.



This process required a fine balancing exercise, upholding the rigour and integrity of the Evaluation, while exercising pragmatism and safeguarding the interests and privacy of workers involved.



Overall Assessment

What does effectiveness mean pursuant to the UNGPs?

Principle 31 of the UNGPs establishes eight effectiveness criteria for non-judicial GMs: **legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on engagement and dialogue, and a source of continuous learning (UNGP Effectiveness Criteria).**

The UNGP Effectiveness Criteria have informed the Evaluation approach **as a floor rather than a ceiling** and provided a lens through which to examine both the access to remedy and the quality of the outcomes they produced. This involved a contextual assessment of the Helpline, having regard to its role and interaction with other mechanisms and actors within the sector.

The Evaluation framework is underpinned by three dimensions:

1. **Remedy as a process**, through which remedy for an adverse impact is provided;
2. **Remedy as an outcome**, that counteracts or makes good the adverse impact(s); and
3. **Role of the ecosystem in the Helpline's effectiveness**, considering the tripartite structure among the Helpline, factories and brands subscribing to the Helpline's services (**Factories** and **Brands**, respectively).

This Evaluation finds that the Helpline plays an important and credible role as a third-party GM within the Bangladesh RMG sector. It serves to complement, not replace, factory-level GMs.

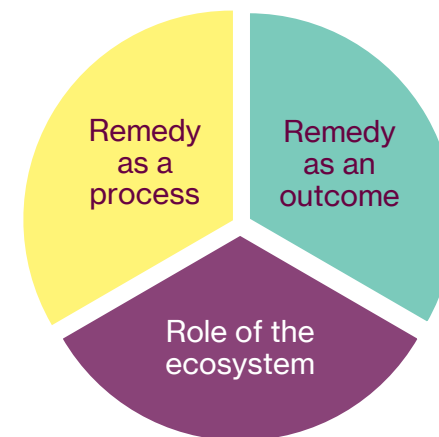
The findings demonstrate two key functions of the Helpline:

- Serving as an interface that facilitates communication among workers, Factories, and Brands during the grievance resolution process; and
- Providing workers with an independent escalation pathway, where Factory-level reporting channels prove to be ineffective or inaccessible.

The Evaluation affirms that GM effectiveness is better understood through the lens of remedy as a process and an outcome and within the broader remedy ecosystem.

Pursuant to the “**remedy ecosystem**” approach as recognised by the UNGPs, effective access to remedy relies upon the interaction and interconnectedness of multiple mechanisms and actors’ GMs at different levels. It is clear from the findings that the success of the Helpline is dependent on the quality of collaboration and trust built between the stakeholders and the Helpline over the years.

Serving as a starting point, the Evaluation hopes to contribute to a growing body of knowledge on what works, what does not, and what the findings mean for promoting access to remedy and improving GMs over time. For full findings and recommendations of the Evaluation, please refer to the [report](#).



Remedy as a Process

- The Evaluation finds that the Helpline performs strongly in formal accessibility, design, and operation. Widespread awareness and sustained call volumes indicate its continued relevance and accessibility to workers. These strengths are supported by design features such as toll-free access, 24/7 availability, and well-established protocols.
- Training and ongoing socialisation efforts promote uptake among workers. Consistent follow-up with rightsholders and positive perceptions of operators staffing the Helpline further reinforce trust and legitimacy. Together, these practices consolidate the Helpline's role as an independent escalation channel where Factory-level mechanisms are ineffective.
- Practical barriers to access remain, including risk of retaliation and underreporting of sensitive issues such as gender-based violence and harassment (**GBVH**). Addressing these sector-wide issues requires deep cross-actor collaboration to build a safer environment for reporting, building on the Helpline's existing measures. Continued efforts to deepen workers' understanding of the Helpline can strengthen the Helpline's role and impact in the remedy ecosystem.



Helpline operators (Courtesy of Phulki)



In-factory training (Courtesy of Phulki)

Helpline Effectiveness

Findings relating to the Helpline's mandate, design, and operation:

- 1 Overall, workers showed good awareness of the Helpline, but more can be done to deepen rightsholders' understanding and trust in the Helpline
- 2 Training is core to awareness-raising which is also reinforced by other means of socialisation
- 3 The Helpline is accessible and easy to use for most workers, but some barriers to access remain
- 4 Operators are suitably qualified and trained, and consistently follow up with rightsholder to confirm resolution

Role of the Ecosystem

Findings that reflect broader structural conditions in the sector where the ecosystem plays a role:

- 5 Risk of retaliation and interference by Factory management discourages workers from reporting
- 6 Underreporting of, and obstacles to, reporting GBVH
- 7 Grievance handling capacity varies across Factories



Helpline Effectiveness

Findings relating to the Helpline's mandate, design, and operation:

- 8 The Helpline provides an escalation channel where Factory-level channels are ineffective or inaccessible
- 9 Workers were generally satisfied with outcomes, but the effectiveness of outcomes varies depending on the nature of the issues raised and the quality of contribution extended by Factories and Brands
- 10 Quantitative analysis provides limited transparency into individual cases and resolution
- 11 Room to strengthen procedural fairness through a more structured internal appeal mechanism

Role of the Ecosystem

Findings that reflect broader structural conditions in the sector where the ecosystem plays a role:

- 12 Involvement of the Helpline and Brands alongside Factories bolsters effective grievance resolution
- 13 Forward-looking prevention and systemic response are potential areas of focus to improve outcomes
- 14 Remedies should be more rightsholder-centric by considering workers' feedback in the design and delivery of remediation
- 15 Longer-term post-remediation monitoring and feedback loops can be integrated



Remedy as an Outcome

- The majority of cases surveyed in this Evaluation were resolved promptly following the Helpline's intervention, and complainants generally had positive feedback. Upon receiving a grievance, the Helpline operators categorise the case based on its risk level, then notify Factory management (and relevant Brand(s) for serious cases) to trigger resolution. The Helpline continues to follow up with both the worker and Factory management. If the issue is not resolved within the required timeframe, the Helpline escalates the matter to the relevant Brand.
- Given the Helpline's remit as an escalation channel, the effectiveness of remediation for a given case initiated through the Helpline depends largely on Factory and Brand responsiveness. Outcomes were stronger where Factories acted promptly on grievances and where Brands used their leverage effectively. Greater alignment with Factory- and Brand-level remediation practices can support more consistent and sustained remediation for workers. This includes enhancing worker participation in the design and determination of remediation, as well as post-remediation monitoring.
- In addition to providing backward-looking, corrective remedies that address the harm caused and consequences to affected individuals, the forward-looking dimension of remedy should form part of the outcome. Forward-looking remedies refer to preventive measures that aim to change the conditions or practices that caused the harm to prevent the occurrence of similar harms in the future. In some of the more complex cases surveyed where Helpline intervention resulted in Factory remediation, the measures were more temporary in nature and did not always address the root cause of the harm. A shift towards proactive prevention would be important to help address systemic issues and reduce the risk of recurrence. This effort would require deeper collaboration and engagement across other ecosystem actors, including other Brands, Factories, and the Helpline.

Recommendations for the Ecosystem

This Evaluation presents an opportunity for collective discussion and decision-making among all relevant stakeholders about what the next growth cycle of the Helpline should be and how each stakeholder will contribute to this growth.

Cross-actor effort to promote access to fair and effective remedy for rightsholders in the Bangladesh RMG sector can focus on these five themes which correspond to the key gaps and opportunities identified in the Evaluation.

Detailed recommendations targeted for the Helpline, Brands, Factories, and civil society organisations are detailed in the full [report](#).

1 Continued investment in awareness raising and trust building

Continuing to engage workers and raising awareness of the Helpline is critical. Building on the strong overall awareness, more can be done to sustain workers' understanding of the Helpline's scope and processes:

- The Helpline should continue to deploy a mix of socialisation channels to complement in-Factory training.
- Factory management should consistently communicate information about the Helpline.
- Brands should co-invest with the Helpline to conduct in-Factory training and socialisation workshops and better use their leverage to ensure Factory-level implementation.

2 Addressing retaliation risk and GBVH barriers in the ecosystem

These issues reflect broader structural conditions in Bangladesh's RMG sector and require particular attention and creative approaches. Initiatives are most effective when conducted as concerted efforts by actors across the ecosystem:

- The Helpline should continue to uphold existing confidentiality and anonymity safeguards, while Factories should adopt, communicate, and enforce workplace-level anti-retaliation policies.
- In relation to GBVH risk, the Helpline should continue to invest in current gender-sensitive practices, while Brands can build on these efforts by embedding GBVH in HRDD programmes.



Recommendations for the Ecosystem

3 Strengthening factory grievance handling capabilities

Since Factory management primarily deliver remediation outcomes, Factory-level improvement can bring about more predictable, equitable, and rights-compatible outcomes.

- Brands should invest in supplier capacity building and oversight, e.g., integrating Factory-level GM review into audits or assessments and providing training to grievance-handling staff and mid-level management.
- The Helpline and Brands should explore how investigative and remediation capabilities can be strengthened in complex cases where Factory or Brand-level responses are found to be ineffective.

4 Moving towards rightsholder-centric, preventive remedies

An ecosystem evolution from reactive, case-based remediation towards outcomes that are preventive and grounded in worker engagement will require greater commitment from Brands and Factories:

- Factories, when determining and delivering remedy, should engage with affected workers more systemically. Worker feedback regarding remedies could be integrated into the Helpline protocol.
- Brands should take prompt action on cases escalated from the Helpline and exercise leverage with Factories to drive proper handling and rights-compatible remediation.

5 Enhanced grievance transparency and HRDD feedback loop

To strengthen transparency, continuous learning, and accountability across the ecosystem:

- The Helpline's quantitative reporting provides a solid baseline for trend analysis, but there is an opportunity to deepen qualitative insights into individual cases.
- Subject to data privacy protocols and in discussion with Brands and Factories, the Helpline may explore acceptable ways to allow Brands' access to individual grievances after resolution.
- Factories can track and analyse grievance data periodically to evaluate Factory-level GM performance and remediation outcomes.

These recommendations reflect the core finding that the quality and sustainability of remediation outcomes are shaped by the wider remedy ecosystem and how the Helpline, Brands, and Factories each have a distinct and complementary role to play in achieving them. While these measures may have already been adopted by different actors to varying degrees, the purpose is to highlight the best practices and drive ongoing and emerging efforts in key areas to strengthen remedy as a process and an outcome.

