

# BEYOND TRANSPARENCY

## Building Safe, Accessible Digital Tools for Supply Chain Accountability

Findings from our consultation with trade unions  
and civil society organizations

SEPTEMBER 2025



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Dear Reader,

Whether this is the first time you're hearing of Open Supply Hub or you've known us for some time, our name demonstrates our roots in openness and transparency. Given this is the first time Open Supply Hub has published a report like this, it's important to communicate to our community why we pursued it, why we're sharing it now, and why what we learned matters.

Supply chain transparency has reached an inflection point. **Digital tools, once peripheral, are now central to human rights and labor monitoring and global supply chain governance.** Laws like the EU's Corporate Sustainability Due Diligence Directive signal a broader shift: companies are now expected to demonstrate awareness of human rights and labor rights risks across their supply chains.

That shift makes one thing clear: **trade unions and civil society organizations (CSOs) and their knowledge about working conditions, freedom of association, and effective grievance mechanisms are essential.** Brands and suppliers are recognizing this, and platforms like Open Supply Hub (OS Hub) have been identified as potential solutions to make connections across these stakeholder groups easier and more effective. In these conversations, the use case and needs for industry felt clearly defined. But the perspective of unions and worker rights organizations didn't.

Open Supply Hub's aim is to power the transition to safe and sustainable supply chains with the world's most complete, open and accessible map of global production. But we do this knowing that **data alone will not create safe or sustainable supply chains.** That requires inclusive participation and meaningful representation—above all of rightsholders who directly experience the consequences of supply chain mismanagement, from unpaid wages and precarious contracts to pollution and community displacement.

From the outset, our organization has worked to balance stakeholder needs through multi-stakeholder governance, external evaluations, engagement processes, and a diverse global team.

These efforts have been important, but not always sufficient. Building an inclusive platform requires constant interrogation of our model, our assumptions, and our role in the ecosystem.

This is the spirit in which this work was undertaken.



Between May and July 2025, we spoke with 65 trade unions, worker collectives, and civil society organizations across six continents. They told us about the systemic obstacles they face and about the opportunities digital tools can unlock when designed with rightsholders at the center.

The organizations that participated gave their time and expertise generously - we thank them sincerely. **Their perspectives deserve to shape the field as broadly as possible.** We hope that developers, funders, regulators, and employers who increasingly rely on digital tools, as well as for trade unions and CSOs themselves, can use this as a resource to strengthen advocacy and engagement in how these tools are shaped. **Those of us who touch digital supply chain data have an opportunity—and a responsibility—to ensure that these tools do not remain instruments of procedural compliance, but instead become vehicles for equity, trust, and structural change.**

This report is not intended as a comprehensive academic study nor to have every answer. **We have intentionally focused on the gaps: what is not working for rightsholder groups, and what is needed to ensure digital tools are more responsive, safe, and inclusive for those most directly affected by supply chain harms.** The insights gathered here are not only directed outward but also inward. They provide a roadmap for OS Hub's own growth while articulating critical opportunities for the wider ecosystem. Some practices we have already begun to implement; others will require continued work and collaboration with partners across the field.

**The digital infrastructure being built today will shape how supply chains are governed for decades. And the future of supply chain accountability will not be determined by any single platform or institution. It will depend on our collective willingness to center the voices of those with the most at stake. This report is one contribution to that larger effort.**

With Gratitude,  
Natalie Grillon,  
CEO & Executive Director, Open Supply Hub





# Executive Summary

**This report presents findings from a multilingual consultation with 65 trade unions and civil society organizations (CSOs) conducted by Open Supply Hub (OS Hub) between May and July 2025. The objective was to explore the evolving landscape of digital supply chain accountability tools from the perspective of rightsholders and their allies. The consultation was not an evaluation of any single platform, but rather a deeper look into the challenges and opportunities these tools present to those most affected by supply chain risks.**

## The State of Digital Tools: Benefits and Persistent Gaps

Participants in the consultation acknowledged the vital role that digital supply chain tools have already played in advancing transparency, enabling brand engagement, and strengthening advocacy efforts around labor rights and climate justice. Platforms such as public supplier databases and digital grievance systems have surfaced risks and created levels of accountability that were previously difficult to imagine.

But despite significant policy support and investment, the full potential of these tools remains out of reach for many rightsholder groups. The consultation made this clear: unions and CSOs continue to face barriers that prevent them from using these systems effectively.

That is why this report focuses squarely on the gaps – what is not working and what must change. Only by confronting these shortcomings can we create a roadmap to ensure digital tools evolve into vehicles for equity, inclusion, and real accountability.



# Key Barriers to Meaningful Participation

The consultation identified four major, interconnected barriers that block rightsholders from using digital tools safely and effectively:

## 1. Structural Constraints:

Political repression, the threat of employer retaliation, and chronic underfunding make participation not only difficult but often unsafe. These are not simply “capacity gaps” but systemic issues that demand systemic solutions.

## 2. Usability Gaps:

Too many digital tools are built without the realities of grassroots users in mind. Lack of mobile-first design, limited functionality in low-connectivity environments, and over-reliance on English and technical jargon lock people out.

## 3. Data Governance Gaps:

Participants voiced serious concerns about who controls data and how it is safeguarded. Without clear terms of use, transparent ownership, and accessible redress mechanisms when harm occurs, informed consent is impossible, they said.

## 4. Performative Accountability:

There is a real risk that digital tools may become box-ticking exercises, rather than drivers of meaningful dialogue. This can then lead to legitimization of “yellow unions” or prompt brands to cut ties with suppliers instead of addressing core labor issues.



# Principles for Worker-Centered Design

To overcome these challenges, this report distills the participants' insights into six core principles for building digital tools that truly serve rightsholders.

These principles can be a framework for evaluation and action:

## TRUST

Establish transparent and clear rules for data governance.

## SAFETY

Build risk mitigation into every layer of design, with anonymity and secure data handling as defaults.

## ACCESSIBILITY

Create tools that work in real-world conditions, including multilingual, low-literacy, and low-connectivity environments.

## SHARED GOVERNANCE

Include rightsholders in decision-making and oversight roles.

## REPRESENTATION

Include grassroots organizations actively and equitably to ensure their voices are not sidelined.

## RECIPROCITY

Acknowledge and return value to participants who contribute time, knowledge, and risk.



# Recommendations for the Ecosystem

The consultation made one thing clear: no single actor can solve these challenges alone. Progress depends on coordinated action across the ecosystem.

This report offers targeted recommendations for four key stakeholder groups:

## Platform Developers:

Build safety and accessibility into the core of your design. Ensure transparent data governance, embed rightsholder perspectives in governance structures, and design for reciprocal engagement.

## Funders:

Provide flexible, long-term core funding directly to grassroots organizations. Invest in digital safety infrastructure and language justice so rightsholders can participate meaningfully.

## Regulators:

Set baseline standards for data ethics and governance in digital due diligence tools. Back these with independent oversight to prevent box-ticking.

## Employers and Business Actors:

Use digital tools to complement – not replace – direct engagement with rightsholders. Share data responsibly and invest in platforms that are co-developed with communities.

**Ultimately, the report finds that for digital supply chain tools to be effective instruments of accountability, they must evolve from being data repositories into platforms that actively protect, empower, and include the voices of those who have the most at stake.**



# Glossary

The following terms are defined in the context of this report. They are not intended as universal definitions but as working meanings to guide the analysis and discussions presented in this report.

TERM

DEFINITION

<b>Asynchronous functionality</b>	A feature that lets people use a platform without needing to be online at the same time or have a strong internet connection, for example, saving work to upload later or sending a message that can be read and answered afterwards.
<b>Collective Bargaining Agreement (CBA)</b>	A formal, legally binding agreement negotiated between a trade union and an employer (or employer association). It defines terms and conditions of employment, such as wages, working hours, benefits, and dispute resolution procedures, and is typically the outcome of a collective bargaining process.
<b>Consent (in data use)</b>	Voluntary, informed, and specific agreement to the collection, use, or sharing of one’s data. For consent to be valid, users must understand what data is collected, how it will be used, who will access it, and what rights they have to withdraw or modify that consent.
<b>Corporate Sustainability Due Diligence Directive (CSDDD)</b>	A European Union directive requiring certain companies to identify, prevent, mitigate, and account for actual and potential human rights and environmental impacts across their operations, subsidiaries, and supply chains. The directive introduces legal obligations around due diligence processes and, in some cases, civil liability for harm.
<b>CSO (Civil Society Organization)</b>	Non-governmental, non-profit groups that operate independently of the state. These include NGOs, community-based organizations, advocacy groups, and grassroots networks that work on social, labor, human rights, or environmental issues.



# Glossary

TERM

DEFINITION

<b>Digital Supply Chain Accountability Tools / Platforms</b>	Digital systems used to collect, monitor, or report on labor, environmental, or human rights conditions in supply chains. These may take the form of databases, dashboards, risk assessment tools, or reporting interfaces that support activities such as supply chain mapping, risk identification, data contribution, or stakeholder engagement, for example, Open Supply Hub. In this report, the terms “digital supply chain accountability tools”, “digital supply chain accountability platforms”, and “digital tools” are used interchangeably and should be understood in this same sense.
<b>Human Rights Due Diligence (HRDD)</b>	A process through which companies assess and address risks to human rights and the environment in their operations and supply chains. It typically includes steps to identify, prevent, mitigate, and account for impacts, and is increasingly required by regulation.
<b>Multi-stakeholder Initiative (MSI)</b>	A voluntary governance model that brings together stakeholders, typically from business, civil society, and sometimes government, to develop standards, monitor compliance, and support collective action around labor or sustainability issues.
<b>Open Data</b>	Data that is publicly available and can be freely used, modified, and shared. In supply chain contexts, open data is often used to improve transparency and accountability by making information on suppliers or production practices accessible to a wide audience.
<b>Retaliation</b>	Any adverse action taken against individuals or organizations as a result of their participation in rights-related activities, such as speaking out, organizing, or contributing data. This can include job loss, denial of future employment, surveillance, harassment, or legal threats.



# Glossary

TERM

DEFINITION

Rightsholder	Any individual or group whose rights may be affected by business activities. In the context of supply chains, this includes workers, trade unions, and communities connected to production, sourcing, or service delivery.
Trade Union	A membership-based organization formed by workers to collectively defend and promote their rights and interests. Trade unions may negotiate CBAs, advocate for labor protections, and support workers in resolving disputes with employers.
Transparency	The public disclosure of supply chain-related information, including supplier names, locations, sourcing practices, and policies. Transparency enables external stakeholders to assess risks, hold actors accountable, and make informed decisions.
Traceability	The ability to track the journey of materials, products, or processes through each tier of a supply chain – from raw material to finished product – using internal systems, documentation, or technology. While closely related to transparency, traceability refers to a company’s internal capacity to follow materials or products through its supply chain, whereas transparency concerns what information is made public or shared externally.
Yellow Union	A worker organization that is controlled, influenced, or created by an employer rather than by workers themselves. Yellow unions often present themselves as representative bodies but lack independence, limiting workers’ ability to engage in genuine collective bargaining or defend their rights. They are generally viewed as undermining freedom of association.

# Methodology: How We Did This







# Methodology

This report is based on a multilingual consultation carried out between May and July 2025. We used a mixed-methods approach built around a semi-structured survey, administered primarily through in-depth interviews. The survey was designed by the OS Hub team with support from trade union and civil society partners. It was piloted with members of [OS Hub's Board](#), and implemented with support from the WageIndicator Foundation in Türkiye and Indonesia.

To make participation as inclusive as possible, particularly for grassroots organizations, interviews were conducted in eight languages: Bahasa Indonesia, Bengali, English, Hindi, Kannada, Portuguese, Tamil, and Turkish. The interviews took place in-person, online (via Zoom, Google Meet), by phone, and through other channels preferred by participants. This flexible, participant-led approach was critical for overcoming barriers of internet connectivity, digital infrastructure, and time constraints.

## Confidentiality and consent

For the safety and privacy of participants, the names of organizations and individuals are not disclosed in this report. All findings have been aggregated and anonymized for the purposes of publication, a process which participants were informed of and consented to before beginning the consultation.

## Scope and intention

While some questions were specific to OS Hub, the consultation was designed with a broader goal: to capture trade union and civil society perspectives on digital supply chain accountability tools as a whole. The focus was on centering participants' needs, experiences, and priorities – not on reviewing or diagnosing any single digital platform.

The findings should be read as insights into the wider landscape of digital tools, from the standpoint of rightsholders and their allies, rather than as an evaluation of OS Hub or other specific initiatives.



# Participant Profile

A total of 65 organizations participated in the consultation, representing a broad cross-section of stakeholders engaged in advancing supply chain accountability and workers' rights.

We classified stakeholders through self-identification and by reviewing each organization's website, mission, and activities. The participants included both long-standing OS Hub users and collaborators, as well as organizations engaging with the platform for the first time.

## By stakeholder type:

- **30 national and international CSOs (NGOs)**
- **22 national-level trade unions and grassroots worker collectives**
- **6 academic institutions, funders, or development agencies**
- **4 global union federations**
- **3 other respondents (a journalist, a legal expert, and a technical consultant)**



## Sectoral Focus

The consultation [concentrated primarily on the garment and agriculture sectors](#), in line with the project grant that supported this work. At the same time, we also intentionally included participants from other sectors: migrant worker groups, platform/gig worker organizations, electronics workers unions, and mining workers collectives.

### This broader scope served two purposes:

First, it ensured that findings were not confined to the dynamics of a single industry but captured cross-cutting insights on governance, safety, and digital rights that are relevant for trade unions and CSOs across a diverse set of supply chains and regions.

Second, it brought in perspectives from sectors where new forms of employment relations and corporate accountability challenges are emerging, such as gig and platform work – currently the subject of [active debate](#) at the International Labour Conference (ILC).

By including this wide range of actors, we were able to place the garment and agriculture sector findings in a broader context, highlighting both the unique challenges these industries face and the broader shifts shaping digital supply chain accountability and labor rights governance.

## Geographic Reach

Organizations represented multiple regions, with some operating transnationally:

- **South Asia: 19**
- **Global (multi-region): 17**
- **Europe: 11**
- **West Asia: 7**
- **Southeast Asia: 7**
- **Latin America: 4**

Regional classification was based on the organization’s primary area of operation. Groups working across multiple continents were categorized as “Global.”

# Barriers to Meaningful Use of Digital Tools by Trade Unions and CSOs





# Key Barriers

A central theme that emerged from the consultation was the gap between the availability of digital supply chain accountability tools and the limited ability of trade unions and CSOs to use them effectively. While some unions and CSOs are already experimenting with these tools and seeing tangible outcomes\*, access and impact remain uneven.

Yet participants stressed that access alone is not enough. Engagement depends on the broader ecosystem in which a platform operates, particularly for grassroots organizations that often face surveillance, intimidation, and resource constraints that shape whether and how they can safely participate.

The consultation surfaced four recurring and interrelated barriers that limit meaningful engagement with digital accountability tools:

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\*For example, OS Hub has been used by certain global union federations, international NGOs, and campaign alliances to strengthen their leverage in supply chain bargaining and brand campaigns. It has been used to identify which brands source from specific factories, check whether suppliers are part of multi-stakeholder initiatives such as the Fair Wear Foundation or the Partnership for Sustainable Textiles, and map supplier clusters across Asia. These examples highlight the potential of open digital platforms that collate and make supply chain data accessible in one place.

## Structural constraints

Political repression, risk of employer or state retaliation, and chronic underfunding limit the rightsholder groups' ability to participate, regardless of how user-friendly a tool may be.

## Usability gaps

Many tools overlook the realities of grassroots organizations, specifically linguistic, infrastructural, and operational limitations. Low connectivity, low-literacy environments, and limited translation options were highlighted as common challenges.

## Data ownership and control

Participants cautioned that data gathered through risky, resource-intensive fieldwork may be used to manage corporate liability rather than improve working conditions. Without feedback loops or shared ownership, grassroots actors risk being treated as passive data sources instead of social partners.

## Concerns about instrumentalization

Some participants worried that digital tools may be used to demonstrate compliance or signal inclusion without fostering genuine dialogue or accountability. This will reduce engagement to a procedural formality rather than a driver of change.



As one union representative from Cambodia put it, “Digital platforms are sometimes designed with the assumption that once supply chain data is made public, rightsholder groups such as trade unions and CSOs will automatically engage with these tools to advance accountability and systemic change.”

Another participant from a Bangladesh union cautioned, “Openness alone does not ensure equity, nor does it guarantee meaningful participation for all stakeholders.”

Taken together these insights underscore, as a Netherlands-based CSO put it, that “Technocratic or one-size-fits-all approaches to digital supply chain accountability tools are unlikely to succeed. Instead, participatory and context-sensitive models of engagement are needed...ones that acknowledge the constraints faced by rightsholders and respond to their lived realities.”

**“Openness alone does not ensure equity, nor does it guarantee meaningful participation for all stakeholders.”**







## Structural Constraints: Political Repression and Legal Precarity

Many participants emphasized that rightsholder organizations face systemic conditions that prevent them from engaging with digital supply chain accountability platforms.

As one Indonesian union representative explained: “These exclusions cannot be reduced to organizational ‘capacity gaps.’ Rather, they reflect entrenched structural constraints – legal, political, economic, and technological regimes that delimit the very terms of participation.”

While this report is not written with the intention to address or solve these systemic barriers, they are included in this report to help illustrate for readers and stakeholders the context in which unions and labor rights advocates are working, as they are being asked to adopt digital supply chain accountability tools.





## Erosion of Freedom of Association (FOA)

Political repression and legal precarity were repeatedly identified as foundational barriers to engaging with digital supply chain accountability tools.

Fourteen organizations ( 22%) across Asia specifically pointed to restrictive labor laws and pervasive state surveillance as key impediments, particularly when it came to contributing data to these platforms.

“Without freedom of association, there’s no safe way to participate. Unions can’t collect or share data openly – it puts them and their members at real risk,” said one staff member at a global union federation.

As participants underlined, digital participation in such settings becomes not only risky but potentially incriminating, further marginalizing the very actors these tools are intended to empower.

**22% cited restrictive labor laws and state surveillance as barriers to contributing data to digital tools.**

Following the 2021 military coup in Myanmar, independent trade unions were effectively banned. Over 150 unionists have since been arrested, two were sentenced to life imprisonment, one has died in custody, and another one has been executed. “We are scared to even keep spreadsheets these days. Every message or file we share could be used against us,” said one organizer.

“In this climate, even routine data collection or communication – core elements of engagement with digital supply chain accountability initiatives – are perceived as criminalized acts of dissent,” added an activist working on Myanmar from outside the country.

In Bangladesh, some union leaders described frequent legal harassment and violent retaliation when attempting to document violations or share grievances in public.

“The right to freedom of association is our biggest challenge. Without it, there’s no organizing – and without organizing, no safe data sharing,” one trade union leader explained.





Indian participants highlighted how recent labor law reforms have further weakened protections for trade unions. “Our government still hasn’t ratified ILO Conventions 87 and 98, which guarantee the right to form unions and bargain collectively. And under the new labor codes, protections for workers are eroding fast. When you can’t legally form a union easily, even contributing to a public supply chain accountability platform carries real danger – we’re vulnerable to surveillance, arrest, or worse,” said one union leader.

In these environments, participation in digital supply chain accountability tools is not simply about willingness or technical literacy. It is foreclosed by legal and political architectures that criminalize or disable freedom of association.

**“The right to freedom of association is our biggest challenge. Without it, there’s no organizing – and without organizing, no safe data sharing,” one trade union leader in Bangladesh explained.**

## **Employer and Buyer Retaliation**

Twelve organizations (19%) identified fear of retaliation from employers and/or buyers, particularly multinational corporations, as a major barrier to engaging with digital platforms, especially when it comes to contributing or verifying supply chain data.

A European civil society organization working with trade unions in South and Southeast Asia noted that, “Even in contexts where trade union activity is legally permitted, participation in digital tools, especially when it involves contributing data about violations or union presence, can trigger subtle or overt forms of retribution including job loss, denial of future employment, and heightened surveillance.”

**19% cited fear of retaliation from employers or brands as a barrier to engaging with digital platforms, especially when sharing data.**



Participants across South Asia also pointed out that governments eager to attract and retain foreign investment often adopt an implicitly anti-union posture, prioritizing business interests over labor rights. This creates a chilling effect on engagement with digital supply chain accountability efforts: when unions or civil society groups attempt to publicly disclose violations, they risk retaliation not only from employers but also from state actors, who may accuse them of undermining national economic interests or deterring foreign investment.

As one trade union leader from Sri Lanka observed: “If we report violations using these tools or show union presence in a factory, companies might just pull out. The union gets blamed, and workers lose jobs. Then the government also turns against us. That makes us scared to share data using these tools.”

Six participants (9%) emphasized that in garment supply chains, when brands identify labor risks – particularly union activity or forced labor allegations – they often respond by severing sourcing relationships with the factory rather than addressing the underlying issues.

While such moves are presented as risk mitigation by brands, trade unions and CSOs argue that in practice this approach may deter participation in transparency efforts and can result in negative consequences for those raising concerns.

This “double edge” of transparency, where visibility can enable accountability but also invite harm, was a recurring concern across interviews. This was especially true in the context of global supply chains marked by unequal power dynamics between multinational brands, Global South suppliers, and unions.

## **Chronic Underfunding and Resource Scarcity**

Chronic underfunding and resource scarcity among grassroots trade unions and CSOs in the Global South severely limit their ability to participate meaningfully in supply chain accountability efforts, participants noted.

Sixteen organizations (25%) from Asia cited staffing shortages, limited digital literacy, and lack of core funding as primary barriers to engaging in initiatives that require sustained monitoring, advocacy, or data contribution.



Several grassroots unions described operating in “survival mode,” forced to prioritize urgent worker needs such as wage recovery, legal aid, or crisis response. In this context, activities like supply chain mapping, contributing to monitoring initiatives, or engaging in multi-stakeholder processes become luxuries rather than feasible commitments. This situation has been further exacerbated by severe cuts to foreign aid funding, including major reductions across both bilateral and multilateral sources.

**25% cited staffing shortages, limited digital literacy, and lack of core funding as primary barriers to engaging with digital tools.**

As one funder reflected: “Even when funding was more available, grassroots organizations doing direct worker engagement – especially in high-risk or repressive environments – have historically received the least. When we don’t fund them directly, we also don’t hear from them. They remain in survival mode, focused on frontline work, but unable to expand or meaningfully contribute to digital supply chain accountability initiatives. And it’s their insight, their field wisdom,

that we most need and are systematically missing in these discussions.”

Three participants (5%) emphasized that the issue is not only funding scarcity, but also how funds are structured and distributed. They described an “unequal and intermediated funding architecture,” where resources often pass through international NGOs and technical providers, limiting access for grassroots unions and CSOs working directly with affected workers.

As one Sri Lankan trade union leader put it: “Funding flows to big NGOs and technical intermediaries, while those of us on the frontlines struggle to access direct support or influence how these systems work. These actors may play useful roles, but the way funding is structured often reinforces power imbalances and limits our participation. Without direct, flexible support, we can’t engage with – let alone shape – these accountability mechanisms, no matter how inclusive they claim to be.”



## Usability Gaps: Design Without Context

Usability gaps refer to barriers that emerge after access is technically available – when a platform is online and reachable, but remains unusable or alienating due to design limitations. These challenges, participants said, are not related to legal or political constraints, but to how the tool is built and how well it aligns with the real-world needs, constraints, and practices of its users.

“Design flaws, language barriers, and unrealistic assumptions about connectivity, literacy, and safety can render a platform technically available but practically inaccessible,” said a staff at an Indian CSO, working in the intersection of technology and labor rights.





**Below are key usability challenges raised by participants in this consultation:**

## **Lack of mobile-friendly design limits access in many Global South contexts**

Grassroots users, particularly in South and Southeast Asia, often rely exclusively on mobile phones to access digital platforms. One textile workers' union in India reported that over 95% of its 13,000 members do not own or use laptops.

As a result, platforms designed primarily for desktop use or those requiring high memory and bandwidth, are effectively out of reach for many low-wage and grassroots union members.

**“If workers can’t run it on a phone, it doesn’t exist for them,” said a trade union leader from Bangladesh.**

In rural and peri-urban areas, particularly across parts of Asia and Latin America, network connectivity is often slow, unstable, or unreliable. Respondents noted that even basic tasks such as uploading evidence, completing forms, or joining virtual meetings may be unfeasible. The absence of features like offline saving, asynchronous functionality, or low-data modes can compound the issue. Several unions reported being unable to access platforms precisely when they were most needed.

“When violations happen, we can’t even load the tool to check which brands are linked to the factory or use the platform to report a grievance,” said a trade unionist from Myanmar.

## **Language, literacy, and jargon barriers create exclusion**

Many transparency tools are built in English or rely heavily on technical, compliance-oriented language. Respondents from Türkiye, Cambodia, and Indonesia emphasized that terms like “stakeholder engagement,” “remediation,” or “due diligence” are often translated literally or bureaucratically, making them unintelligible to many workers and even to some organizers.





“For low-literacy users, text-heavy interfaces are especially exclusionary. Workers with disabilities face additional challenges due to a lack of accessible or adaptive design,” said a union representative from Sri Lanka.

Participants recommended integrating audio instructions, local-language video guides, voice note submissions, and icon-based navigation. Several also stressed that translation must go beyond literal language – it should reflect local meaning, cultural context, and the lived realities through which labor rights are understood and practiced.

### **Poor user experience discourages engagement, even among motivated users.**

Platforms with complex navigation, unclear menus, rigid filters, or opaque reporting flows are difficult to use, especially for those with limited digital experience.

Respondents shared that without ongoing onboarding or user support, many users struggled with basic tasks such as identifying brands linked to factory names, downloading labor violation reports, and navigating redress or grievance submission processes.

“If the user journey is not intuitive, especially for those with limited digital literacy or experience, the potential of the platform remains unrealized,” explained a union representative from Türkiye.

Participants also emphasized the importance of accommodating real-world search behavior. “The lack of fuzzy search makes it harder for workers or local organizers to get what they need from these digital platforms. Most workers don’t know the exact spelling of a brand... they type it how it’s spoken. Someone might write ‘Beniton’ instead of ‘Benetton’ or ‘MS’ instead of ‘M&S.’ If the system can’t handle these small errors or shorthand, it ends up excluding non-native English speakers,” said a labor lawyer in India.



## Data Governance Gaps: Consent, Ownership, and Accountability

Eight participants (12%) in this consultation raised significant concerns about data governance, specifically, how data is controlled, shared, and safeguarded once contributed to digital supply chain accountability platforms.





## Lack of Clear and Accessible Terms Undermines Informed Consent

In contexts shaped by surveillance, legal precarity, and fear of retaliation, trade unions and CSOs stated that they require strong assurances that participation in digital initiatives will not put them or their members at risk. Many respondents noted that in practice, terms and conditions on these platforms are often overly legalistic, difficult to locate, or missing critical safeguards.

Participants pointed out that key questions frequently go unanswered on the websites of many digital supply chain accountability tools, such as:

- Who controls the data?
- How long is it visible?
- Who can access it?
- Under what conditions can it be shared?
- What happens if harm occurs?

Six trade unions and CSOs (9%) emphasized the importance of translating these terms – especially those related to data use, safety, and redress into local languages using clear, non-technical language. They stressed that consent cannot be meaningful if users do not understand the risks or protections involved.

“Without clarity and transparency around data handling, even the most well-designed platforms risk undermining trust. If users are unsure how their data will be used, or what protections exist, participation becomes not only unlikely but potentially unsafe,” said a trade union leader from Indonesia.

**9% stressed the need to translate terms and conditions on data use, safety, and redressal mechanisms into local languages using clear, non-technical language.**





## Unresolved Tensions Around Data Ownership and Control

Participants also raised broader concerns around data ownership and control and whose interests the data ultimately serves. Grassroots unions and CSOs noted that data gathered through risky, resource-intensive fieldwork has historically been shared upward with little recognition or involvement from those who collected it. Many emphasized that they were wary of replicating this dynamic when engaging with digital platforms.

“Without clear ownership or decision-making power, we become just data feeders,” said a union organizer from India.

A few participants also expressed concern that such data could be used to manage corporate liability or fulfill compliance requirements, rather than to improve working conditions or support meaningful accountability.

“In the absence of shared ownership models, participatory analysis, or feedback loops, grassroots actors risk being treated as passive data providers – not as equal partners in driving accountability,” said a funder who works closely with grassroots unions and CSOs.

**“Without clear ownership or decision-making power, we become just data feeders,” said a union organizer from India.**

## No Clear Redress When Harm Occurs

Participants emphasized that many digital platforms currently lack clear accountability mechanisms to address harm. Alongside concerns about consent and ownership, this absence of safeguards was seen as a major deterrent to participation.

“If harm arises from data disclosure – such as retaliation against a whistleblower, brand withdrawal from a supplier, or legal targeting of a union – there are often no established procedures for filing complaints, updating or removing data, or seeking redress,” explained an NGO working in West Asia. The risks are compounded by uneven capacities.



“The promise of ‘openness’ then feels one-sided. Workers and unions are asked to share information, but there are no protections or guarantees in return. Companies have expensive legal teams to review terms and entire tech teams to audit platforms before uploading anything – we don’t. Most smaller unions and CSOs don’t even have a lawyer on staff. So how can we engage safely?” noted a European NGO working with South Asian trade unions.

**“Companies have expensive legal teams to review terms and entire tech teams to audit platforms before uploading anything – we don’t. Most smaller unions and CSOs don’t even have a lawyer on staff. So how can we engage safely?” said a European NGO**

A funder also highlighted the structural imbalance this creates: “In the current landscape, unions and CSOs are often asked to trust platforms without being equipped to evaluate their safety, demand changes, or hold them accountable. This imbalance must be addressed if these tools are to be truly inclusive and safe for those most at risk.”





## Performative Accountability: Concerns About Replacing Dialogue with Data

A major theme across the consultation was the risk of performative accountability: that digital supply chain accountability tools may be used to signal compliance with Human Rights Due Diligence (HRDD) frameworks rather than to strengthen meaningful engagement with rightsholders. Six participants (9%) specifically cautioned that when platforms display features such as factory-level grievance mechanisms, union presence, or forced labour risk alerts, brands may treat this data as sufficient evidence of HRDD, without directly engaging affected organizations – particularly grassroots unions and CSOs.





As one European NGO representative explained:

“These tools can become shortcuts, used to claim alignment with due diligence frameworks while sidestepping the structural work of dialogue, negotiation, or long-term remediation.”

Some also warned of perverse incentives created by the pressure to demonstrate formal HRDD compliance through digital tools. In India, a trade union leader noted that this visibility may prompt supplier factories to establish “yellow unions” that mimic compliance in the tools while undermining independent worker representation: “The pressure to demonstrate formal compliance is already prompting some supplier factories to create yellow unions. When platforms display these entities alongside independent trade unions without adequate scrutiny, it risks legitimizing them... and it can do more harm than good in the long run.”

**“The pressure to demonstrate formal [HRDD] compliance is already prompting some supplier factories to create yellow unions.” said a Indian trade union leader.**

The opportunities and concerns surrounding performative accountability came into focus most clearly through discussions of two specific types of data that could be shared via digital platforms: [grievance mechanism data](#) and [Collective Bargaining Agreements \(CBAs\)](#).

## Grievance mechanisms: value and risks

Respondents broadly supported the inclusion of grievance mechanism data in digital supply chain accountability platforms, but with important caveats. A majority (47 participants, 72%) favored making facility-level grievance information visible (i.e. which mechanisms are available where), provided that critical details – such as whether the mechanism is employer-run, brand-run, government-administered, or independently managed – were clearly indicated. This was seen as essential for assessing bias, accountability, and reliability.

International campaign organizations were particularly supportive, emphasizing the strategic utility of such data: “This is what we urgently need – it would be an incredibly helpful tool. We could write to [brands] immediately when grassroots partners give us a case,” explained a campaigner from a global feminist organization.



## **72% favored making facility-level grievance information visible provided that critical details regarding the mechanism were clearly indicated.**

At the same time, concerns about the inclusion of grievance mechanism data were especially strong among grassroots organizations in Asia. Sixteen participants (25%), mainly from groups working with garment workers, warned that simply listing grievance channels alongside union presence can create the appearance of robust accountability, even where mechanisms are weak, inaccessible, or distrusted.

A Sri Lankan trade union representative also added: “Digital grievance platforms are often showcased as progress, but they rarely work for workers in reality. There’s no trust, no follow-up, and no way to track what happens after a complaint. But companies use them to say they’re listening, without actually talking to unions.”

Participants also stressed that grievance mechanisms, without genuine FOA and Collective Bargaining Agreements (CBAs), often fail to deliver justice. As a Cambodian trade union leader explained: “It may look good on a dashboard, but it doesn’t mean anything for the worker who is afraid to report.”

## **CBAs: the value of disclosure**

Discussions around leveraging digital tools to make information about Collective Bargaining Agreements (CBAs) more accessible revealed a great deal of consensus.

## **65% were in favour of publishing information on Collective Bargaining Agreements.**

Many participants raised the value of CBA disclosure unprompted, even before questions were asked.





Forty-two respondents (65%) supported publishing CBA information, reasoning that once an agreement is concluded and formally recognized, the strategic risks of disclosure are significantly reduced. Twelve unions and CSOs (18%) went further, advocating for publication of the full text of CBAs in accessible formats so that others could replicate effective clauses and enforcement models.

Participants emphasized that integrating CBA data with other supply chain information would enhance findability and usability, allowing agreements to be more easily located, compared, and applied in advocacy and organizing efforts.

## The “how” is critical

Across these discussions, participants stressed that their critiques should not be misinterpreted as opposition to supply chain transparency. Rather, they underscored the need for forms of transparency that are participatory, accountable, and rightsholder-driven. Many highlighted the value of mapping supply chains, documenting FOA violations, tracing sourcing relationships, and capturing working conditions in the lower tiers of supply chains that often go unreported.

As one US-based CSO noted:

“What we are all calling for is not less transparency, but more participatory and accountable forms of it, designed with and for rightsholders. We envision digital tools that build collective power and enable structural change – not just HRDD checkboxes.”

A union leader from Indonesia added: “It’s not about whether transparency tools have value. We already know they do. It’s about whether they can be reimaged as genuine pathways for change, grounded in dialogue, trust, and collective action.”



# Normative Principles for Worker-Centered Design of Digital Tools



# Principles

Through this consultation, trade unions and civil society organizations raised diverse perspectives on what makes digital supply chain accountability tools safe, usable, and genuinely participatory.



We have synthesized their feedback into six core principles, offered here as one possible model for building digital initiatives that truly support rightsholder participation. These principles, while grounded in the lived realities of trade unions and CSOs, are not intended as a definitive checklist, but as a starting framework that can be adapted and built upon in different contexts.



## ACCESSIBILITY

### Adapt tools to real-world conditions

For many rightsholders, particularly in low-connectivity, multilingual, or low-literacy contexts, accessibility means as much as technical functionality. It includes language support, ease of use, and formats tailored to their capacities and realities.



## RECIPROCITY

### Recognize the effort and risk involved in participation

When rightsholders contribute knowledge, time, or take personal risk, they should receive reciprocal value. This may include access to relevant data, co-created tools, visibility for their work, or financial support to sustain their engagement.



## REPRESENTATION

### Ensure inclusive and equitable participation

Effective participation must reflect the diversity of rightsholders across gender, geography, sector, and organization type. Participants highlighted the importance of actively including grassroots groups and providing the support needed to enable their full participation.



## SAFETY

### Design with risks in mind from the outset

Especially in environments where organizing is restricted or surveilled, protective features such as anonymity and secure data handling are seen as essential, not optional.



## SHARED GOVERNANCE

### Include rightsholders in oversight and decision-making

Meaningful engagement with rightsholders goes beyond consultation. Participants emphasized the value of rightsholders holding formal roles in governance structures, such as advisory boards or collaborative review panels, to ensure tools evolve in line with their real-world needs and priorities.



## TRUST

### Ensure transparency around data use.

Participants emphasized the need for clear, accessible information on how data is collected, used, stored, and governed – along with the ability to challenge or withdraw it when needed.



# Recommendations and Next Steps





# About this Section

This final section translates the insights, principles, and priorities shared during the consultation into concrete, actionable recommendations. They are the results of a synthesis conducted by OS Hub of what participants identified as necessary to strengthen digital supply chain accountability tools.

The recommendations are organized around four key stakeholder groups that participants themselves repeatedly referred to as central to shaping the design, governance, and use of these tools:

- Platform Developers and Operators
- Funders and Donor Organizations
- Regulators and Policymakers
- Employers and Business Actors

It is important to note that many of these practices may already be implemented in part by different stakeholders. The intention here is not to suggest that the entire ecosystem is lacking across all points, but to consolidate and amplify the perspectives shared through this consultation.

At the same time, participants repeatedly underscored that some conditions, such as FOA, freedom of expression, and other structural enablers of civic space are so fundamental that without them, meaningful participation in digital supply chain accountability tools is often not fully possible. While such conditions cannot be resolved by platforms, funders, or business actors alone, they remain critical to the effectiveness of any digital initiative. For this reason, they are not the focus of the recommendations presented here, though they form the essential backdrop against which all other efforts must unfold.

As emphasized in earlier sections, participants' concerns should not be read as a rejection of transparency or digital supply chain accountability efforts. Rather, these recommendations point to where participants believe the field must go next: building on existing progress, addressing persistent barriers, and exploring how digital initiatives can be reimaged to embed rightsholder participation, equity, and protection at their core.



# Recommendations for Platform Developers and Operators

Developers and operators of digital supply chain accountability tools hold significant power in shaping how accessible, safe, and effective these systems are for engagement with workers, trade unions, and CSOs. The recommendations below aim to strengthen trust, usability, and governance, while leaving space for future innovation.

We also want to acknowledge that OS Hub itself is learning how to fully embed these practices and generating the resources needed to do so. Moving forward, we are committed to working systematically with unions and civil society partners to put these principles into practice and to continue improving alongside the wider ecosystem.



## Ensure Transparent and Consent-Based Data Governance

Terms of use must be easy to access and written in clear, translatable language, with versions available in the main languages spoken by users – not just English. These should be prominently displayed without requiring a login and cover essential topics such as data control, access rights, visibility duration, and redress options.

Platforms should enable revocable consent, layered visibility, and flexible contribution settings so users can decide how their data is shared, seen, and withdrawn. Clear grievance procedures are also critical, including options for takedowns, data correction, and redress. Where issues go beyond a platform's scope, users should be referred to trusted legal, advocacy, or support organizations.

## Design for Accessibility and Low-Barrier Use

Accessibility must start with mobile-first, low-bandwidth design that works reliably in low-connectivity environments. Platforms should also offer offline and asynchronous participation options, with support for tools and formats that unions and CSOs already use, like WhatsApp, Excel, voice notes, or photo-based reporting.

Design should anticipate low digital literacy. This means intuitive icon-based navigation, minimal reliance on text, and clear audio-visual guidance in local languages. Translation must extend beyond interfaces to onboarding materials, grievance procedures, and documentation, using culturally grounded and non-technical language wherever possible.





## Support Safety as a Core Design Priority

Platforms should embed risk assessments into design and updates, developed in collaboration with local organizations. They must offer anonymity and pseudonymity options such as anonymized submissions, role-based identification (e.g., “union representative”), or delayed attribution.

Tools for secure engagement – encrypted uploads, protected messaging channels, and flexible visibility controls – should be used as a standard practice. Platforms must also help build user capacity such as by connecting organizations to digital rights groups or providing practical support like peer trainings and simple security guides.

## Embed Rightsholders in Platform Governance

Governance must meaningfully include rightsholders in decision-making roles. Advisory boards or steering committees with rightsholders should hold genuine authority and reflect regional diversity. Their participation must be properly resourced through stipends, translation, and coordination support.

Feedback from rightsholders should be ongoing, not limited to one-off consultations. Open-source style forums and participatory processes can help ensure that definitions, categories, and data fields reflect rightsholder realities, rather than being shaped solely by regulatory demands or brand-driven compliance priorities.

**Feedback from rightsholders should be ongoing, not limited to one-off consultations.**





## **Keep the Platform Future-Ready and Interoperable**

To remain useful, platforms must anticipate evolving needs. This includes offering machine-readable formats (CSV, JSON), clear APIs, and publishing documentation on methodologies, licensing, and taxonomies in developer-friendly formats. Data should not be locked behind static interfaces. Instead, it should be reusable and adaptable so that future tools, especially those using AI, can build on it.

## **Collaborate with Digital Rights and Open Data Communities**

Collaboration with established digital rights and open data networks can enable valuable knowledge exchange and joint development. These spaces also help unions and CSOs build confidence and capacity in areas such as digital rights, data ethics, and open governance.

Co-development should focus on adapting and strengthening these existing standards and practices, rather than reinventing them, to ensure interoperability with broader digital ecosystems.

## **Foster Reciprocal Engagement**

Participation by rightsholders requires significant time, effort, and often political risk. Engagement must therefore be reciprocal, with platforms offering tangible value in return, such as free access to relevant data for campaigns, co-developed lightweight tools, or visibility for local struggles. The form of reciprocity should be defined in collaboration with rightsholders themselves, ensuring that benefits flow back to those most affected by – and most essential to – supply chain accountability.





# Recommendations for Funders

Alongside platforms, funders were the second most frequently identified actors responsible for shaping the digital supply chain accountability ecosystem. As a trade union in Sri Lanka put it: “Funders play a critical role in shaping not only what gets built in the digital supply chain accountability ecosystem, but how and for whom.”

Participants stressed that inclusive and sustainable participation is not only a design challenge but also a funding one. The structure and flexibility of donor support often determine whether grassroots trade unions and CSOs can engage safely, meaningfully, and on equal terms.

The recommendations below aim to guide funders in aligning resources, timelines, and accountability models with the lived realities of rightsholders – ensuring their knowledge, risks, and priorities are recognized and adequately resourced from the outset.





## **Provide flexible core funding for grassroots organizations**

Unrestricted, long-term support is essential for grassroots unions and CSOs to engage meaningfully in the development and governance of digital tools. Project-based funding alone is often too narrow or rigid to support safe, sustained participation. Core funding enables them to build the organizational stability and autonomy necessary to participate on equal terms, while also increasing their ability to invest in digital literacy and risk management.

**Unrestricted, long-term support is essential for grassroots unions and CSOs to engage meaningfully in the development and governance of digital tools.**

## **Invest in safety infrastructure**

Support the digital and legal safety needs of rightsholder groups, not just to engage with specific platforms, but to participate safely in the broader digital ecosystem. This includes funding for secure communication tools, harm mitigation protocols, digital security training, and legal infrastructure to support rightsholders when engagement leads to risk or retaliation.

## **Make language justice a core funding priority**

Support the translation and adaptation of tools, training, and documentation into local and under-digitized languages. Where such infrastructure does not yet exist, invest in developing it in collaboration with communities.



## **Build inclusive processes into intermediary grants**

When funding INGOs or technical implementers, ensure that budgets and timelines make space for inclusive practices such as translation, support services, and iterative co-design with rightsholder groups. These measures must be built into the core of project planning, not treated as add-ons.

Funders should also ensure that a meaningful share of resources flows directly to grassroots organizations, with clear accountability mechanisms in place to track whether these inclusive practices are being delivered.

## **Invest in sustained capacity-building for rightsholder groups to use digital platforms not only at a functional level, but as strategic tool for advocacy and campaigns.**

## **Support long-term capacity and cross-sector learning**

Invest in sustained capacity-building for rightsholder groups to use digital platforms not only at a functional level, but as strategic tools for campaigns, negotiations, and advocacy. Support should extend beyond individual leaders to reach a broad base within organizations, ensuring collective strength rather than isolated expertise. Facilitate long-term partnerships with digital rights, cybersecurity, and open data networks so that unions and CSOs can deepen their skills, share infrastructure, and build durable knowledge across sectors.



# Recommendations for Regulators and Policymakers

With due diligence legislation gaining traction globally, digital tools are increasingly used to assess supply chain risks, manage compliance, and report on corporate accountability efforts. Regulators and policymakers play a vital role in shaping the enabling environment in which these tools operate by setting expectations, offering guidance, and supporting mechanisms that promote safe and equitable rightsholder participation.

Participants emphasized that public regulation can help ensure digital tools do not unintentionally reinforce exclusion or harm. The recommendations below aim to support regulators in strengthening accountability, inclusivity, and responsible innovation across the growing ecosystem of digital tools.



## **Support the Development of Baseline Standards for Governance and Data Ethics**

Encourage the development of practical guidance or baseline expectations for digital supply chain accountability platforms, especially those involving rightsholder participation. These standards should cover key areas such as informed consent, revocable data rights, accessible redress mechanisms, and inclusive governance structure. Where possible, these standards should be co-developed with input from rightsholder groups, civil society, and technical communities to reflect the diverse contexts and risks in which these tools are deployed.

**Encourage the development of practical guidance or baseline expectations for digital supply chain accountability platforms, especially those involving rightsholder participation.**

## **Promote Accessibility in Publicly Supported Digital Tools**

Ensure that platforms receiving public funding meet basic accessibility expectations or have clear, time-bound plans to do so. Public bodies can also offer technical or financial assistance to help platforms, particularly those developed by smaller or mission-driven actors, meet these benchmarks.

## **Encourage Independent Oversight and Support Mechanisms**

Support the creation of independent structures, either within or external to platforms, that provide spaces for rightsholders to raise concerns, seek redress, or flag unintended harms. This could include advisory boards, ombudsperson roles, or collaborative feedback bodies. Such mechanisms can help identify where tools may be creating risk, ensure those risks are addressed, and provide an avenue for learning and adjustment.



# Recommendations for Employers and Business Actors

Employers and business actors – including brands, suppliers, and consultancies – engage with digital due diligence platforms as both data contributors and users. Participants emphasized that how these actors interpret, act on, and communicate data significantly influences whether platforms strengthen meaningful accountability or contribute to superficial compliance.

The following recommendations aim to support more thoughtful, rightsholder-informed use of digital tools across supply chain oversight and due diligence efforts:



## **Use Platform Data to Complement Dialogue, Not Replace it**

Information displayed on digital platforms – such as about grievance mechanisms, union presence, or risk alerts – can be a useful starting point but should not substitute for direct engagement with workers, trade unions, or civil society groups. Where issues are flagged, engage directly with rightsholder organizations to understand the context and jointly determine next steps.

### **Share Data Transparently and Responsibly**

When contributing data to platforms, ensure that information is accurate, regularly updated, and submitted with appropriate safeguards. Before sharing data involving unions, grievances, or sensitive issues, check that consent and safety considerations have been addressed, especially in high-risk contexts.

## **Invest in Rightsholder-Centered Tools and Approaches**

Where feasible, support digital supply chain accountability platforms that are co-developed with rightsholder organizations, and that prioritize accessibility, safety, and accountable governance.

This may include providing financial or in-kind support, participating in co-design initiatives, or advocating for standards that reflect real-world working conditions and risks.

**Information displayed on digital platforms – such as about grievance mechanisms, union presence, or risk alerts – can be a useful starting point but should not substitute for direct engagement with workers, trade unions, or civil society groups.**

# Conclusion & Acknowledgements







# CONCLUSION

We are writing this report in a moment of profound uncertainty. Geopolitical instability, the climate crisis, and financial pressures are reshaping supply chains and straining the organizations and communities that depend on them. For many unions, CSOs, and workers, the priority is survival itself.

As a non-profit, we feel these pressures too. But this only reinforces the urgency of building processes that are inclusive, careful, and long-term – so we do not sacrifice tomorrow’s possibilities for today’s expediciencies, or inadvertently reinforce the very systems of exclusion and exploitation we seek to dismantle.

Digital supply chain accountability tools are not a panacea. They cannot substitute for freedom of association, robust labor laws, or collective bargaining. Yet they remain powerful. Over the past decade, open data platforms, environmental, social, and governance (ESG) dashboards, and other digital tools have brought supply chains out of obscurity and created new opportunities for accountability.


The task now is to carry this progress forward: to recognize both the potential and the limits of digital tools, and to ensure they are designed and governed to serve everyone in supply chains, especially the most disadvantaged rightsholders.

The principles and recommendations in this report are rooted in the lived experiences of unions and civil society groups, and in our own lessons from this work. We know they cannot be realized overnight, or by any single actor. They demand collaboration – platforms, donors, businesses, and rightsholders working together with patience, humility, and reciprocity. If taken seriously, these principles can transform digital tools from static repositories of data into catalysts of structural change, tools that enable workers and communities not only to be visible, but to shape the very systems that govern their lives.

Our hope is that this report moves us in that direction. Regulatory frameworks like the CSDDD may open doors to stronger corporate accountability; digital supply chain tools, if built inclusively and responsibly, can ensure that what lies beyond those doors is not just more data but practical, accessible systems that strengthen the voice and agency of those most affected by supply chain harms. The journey will not be quick or simple, but with shared respect and responsibility, these tools can become part of a broader movement towards fairer, kinder and more sustainable supply chains.

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**Thank you  
for taking  
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read this  
report.**

**Please feel free to reach out to  
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