



Summary

Beyond Transparency: Building Safe, Accessible Digital Tools for Supply Chain Accountability

This document provides a summary of the Open Supply Hub (OS Hub) report:

[Beyond Transparency: Building Safe, Accessible Digital Tools for Supply Chain Accountability](#)

The report was developed in the context of the European Union's Corporate Sustainability Due Diligence Directive (CSDDD) and similar human rights due diligence (HRDD) legislation emerging in other jurisdictions. These frameworks represent a turning point: they impose new obligations on companies while sharpening the focus on trade unions and civil society organizations (CSOs) as indispensable sources of knowledge on freedom of association, working conditions, and the effectiveness of grievance mechanisms. Increasingly, policymakers and businesses acknowledge that without the insights of these actors, due diligence processes risk being partial and ineffective.

Digital supply chain accountability tools are online systems that collect, publish, and analyze information about supply chains. Platforms such as Open Supply Hub (OS Hub) are frequently viewed as spaces to display HRDD-relevant data and as potential enablers of stronger connections between the many actors shaping supply chains. It was in this context that OS Hub undertook a consultation between May and July 2025 with 65 organizations working with or representing workers in global supply chains. Participants included grassroots collectives, national trade unions, global federations, NGOs, funders, and academics from across Asia, Europe, and the Americas. The consultation sought not only feedback on OS Hub itself but also broader reflections on the digital supply chain accountability landscape as a whole.

What emerged is a snapshot of how rightsholder groups experience these digital platforms in practice, and what is needed to make them safe, accessible, and genuinely useful for them. The report is directed at platform developers, funders, regulators, and business actors who increasingly rely on digital tools to demonstrate transparency and due diligence, offering them direct insights from those most affected by supply chain risks.





Barriers to Meaningful Use

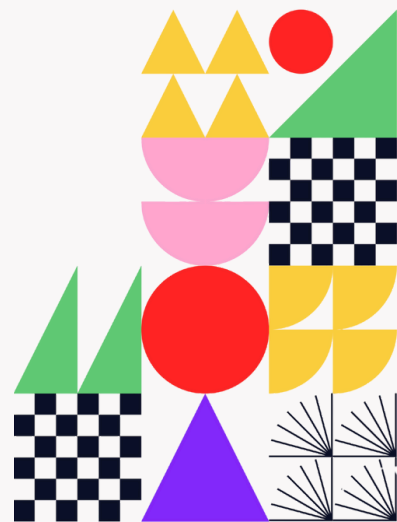
A central theme that emerged from the consultation was the gap between the growing availability of digital supply chain accountability tools and the ability of trade unions and CSOs to use them effectively. While some organizations are experimenting with these platforms, access and impact remain uneven. Four major, interrelated barriers stood out clearly.

Structural constraints:

Political repression, weak labor protections, and the risk of retaliation from employers or governments severely limit safe participation for many trade unions and CSOs. After the 2021 military coup in Myanmar, for example, union leaders were arrested, imprisoned, and even killed. In such a context, simply saving or sharing documents on digital platforms can be incriminating, as union leaders explained. In the consultation, 22% of organizations (14 in total) cited restrictive labor laws and pervasive surveillance as the greatest barrier to safe participation, while 19% (12 organizations) identified fear of retaliation from employers or multinational buyers as a major deterrent. Chronic underfunding further compounds these constraints: 25% of respondents (16 organizations) reported that limited staff, low digital literacy among staff, and the absence of core, flexible, funding leave them in “survival mode,” unable to allocate resources to engage with these platforms.

Usability gaps:

Most workers in the Global South rely on mobile phones, often in low-connectivity environments. Platforms designed primarily for desktop use, requiring high bandwidth, or functioning only in English exclude large segments of rightsholders. Participants highlighted that poor user experience, rigid search functions, and literal translations of technical jargon (such as “due diligence” or “stakeholder engagement”) further alienate low-literacy and multilingual groups.





Data governance gaps:

Many participants expressed deep concern that data collected through risky, resource-intensive fieldwork may ultimately be used to manage corporate liability rather than to improve working conditions if shared on digital supply chain accountability platforms. 12% of respondents (8 organizations) raised significant concerns about unclear terms on data control, data visibility, and the lack of a grievance redressal system on the websites of many platforms. Without feedback loops, grievance procedures, or shared ownership, grassroots actors feared they would be reduced to “data feeders” rather than equal partners in due diligence processes.

Performative accountability:

A recurring worry was that digital tools may become compliance shortcuts, enabling companies to “tick boxes” rather than engage in genuine dialogue with rightsholders. While 72% of participants (47 organizations) supported making facility-level grievance information visible, 25% (16 participants) cautioned that simply listing grievance channels risks legitimizing weak or distrusted mechanisms. Concerns were also raised about “yellow unions” created by employers appearing alongside independent unions on these platforms, undermining freedom of association. By contrast, there was strong support for transparency around Collective Bargaining Agreements (CBAs): 65% of respondents (42 organizations) supported publishing CBAs, and 18% (12 organizations) went further, advocating for full-text disclosure so that effective clauses and enforcement models could be replicated elsewhere.





Principles for Worker-Centered Design

In response to these barriers, participants outlined what they believe should form the foundation of genuinely inclusive digital supply chain accountability platforms. Their feedback has been synthesized into six principles for worker-centered design. These principles are not a definitive checklist, but an initial framework that can be adapted and built upon in different contexts.

1. Trust

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.

2. Safety

Tools must be designed with risks in mind from the outset. In contexts where organizing is restricted or heavily surveilled, protective features, such as anonymity, encryption, and secure data handling, are essential.

3. Accessibility

Platforms must adapt to real-world conditions. For rightsholders working in low-connectivity, multilingual, or low-literacy contexts, accessibility is as much about design as it is about technology. This means ensuring mobile-first access, multilingual interfaces, intuitive navigation, and formats that reflect the capacities and realities of users.

4. Shared Governance

Meaningful engagement requires that rightsholders are not only consulted but also hold formal roles in governance structures. Advisory boards, steering committees, or collaborative review panels must give them genuine oversight and decision-making power, ensuring that tools evolve in line with their needs and priorities.

5. Representation

Digital accountability efforts must reflect the diversity of rightsholders. Participation must actively include grassroots groups across gender, geography, and sector, with the necessary support to enable full and equitable engagement.

6. Reciprocity

When rightsholders contribute knowledge, time, and take risks, their contributions must be recognized and valued. Reciprocity can take many forms, and should be defined in consultation with rightsholder groups themselves.





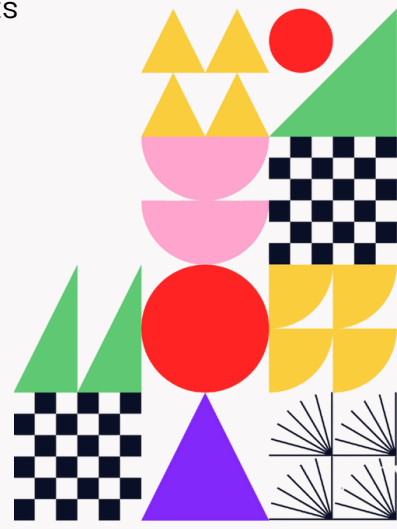
Recommendations

As first steps in applying these principles, recommendations are provided for platform developers, funders, regulators, and business actors, based on a synthesis of respondent feedback.

For platform developers and operators

Digital supply chain accountability platforms play a central role in how workers and civil society engage with emerging supply chain governance. Developers must ensure these systems are safe, inclusive, and responsive to rightsholder realities by:

- Adopting transparent, consent-based governance: Terms of use must be clear, accessible in local languages, and specify who controls data, how long it is visible, and how users can withdraw consent.
- Prioritizing mobile-first, low-bandwidth, multilingual design: Tools should work on basic smartphones, allow offline or asynchronous use, and provide intuitive navigation with meaningful, context-specific translation.
- Embedding anonymity, encryption, and risk assessments: Platforms should embed risk assessments developed in collaboration with rightsholders into design and updates.
- Creating governance structures with real rightsholder power: Advisory boards or steering committees with unions and CSOs must hold formal authority, backed by stipends, translation, and coordination support where needed.
- Ensuring interoperability and open formats: Platform data should be published in formats that are easy to read, share, and reuse (for example, CSV or JSON). Open APIs should allow unions, researchers, and advocates to integrate this data into their own work. Collaboration with digital rights networks can help align these tools with broader technical and ethical standards.
- Providing reciprocal benefits: Engagement must deliver value for rightsholders, defined in consultation with them and proportionate to the risks and efforts of their contributions.





For funders and donors

Funding structures determine whether grassroots trade unions and CSOs can participate safely and consistently. Donors should:

- Provide flexible core funding: Unrestricted, long-term support is essential for grassroots unions and CSOs to engage meaningfully in the development and governance of digital tools.
- Invest in digital and legal safety: 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.
- 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, accompaniment, and iterative co-design with grassroots groups and workers.
- Prioritize language justice: 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.
- 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.





For regulators and policymakers

Participants emphasized that public regulation can help ensure digital tools do not unintentionally reinforce exclusion or harm. As part of this, they recommended regulators should:

- **Set baseline standards:** 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.
- **Enforce accessibility benchmarks:** 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.
- **Promote independent oversight:** 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, from these platforms.

For employers and business actors

Participants emphasized that how businesses interpret, act on, and communicate data significantly influences whether platforms strengthen meaningful accountability or contribute to superficial compliance. They should:

- **Use data to deepen dialogue:** Platform information on grievances or union presence must be treated as an entry point for direct engagement with workers and CSOs, not as a substitute for it.
- **Share data responsibly:** When contributing data to platforms, ensure that information is accurate, regularly updated, and submitted with appropriate safeguards.
- **Invest in co-developed tools:** Where feasible, support digital accountability platforms co-developed with rightsholders that prioritize accessibility, safety, and accountable governance—through funding, co-design, or advocacy for standards reflecting real-world conditions.





Conclusion

Digital supply chain accountability platforms are not a substitute for freedom of association, strong labor laws, or collective bargaining, but they remain powerful instruments for advancing corporate accountability. The task now is to ensure their design and governance serve everyone equally—especially those most disadvantaged in supply chains. The principles and recommendations in this report call on platforms, funders, businesses, and rightsholders to work together with patience, humility, and reciprocity. Only then can these digital tools move beyond data collection to drive meaningful change in global supply chains. Our hope is that this report contributes, even modestly, to that direction.

Contact Us

Please feel free to reach out to the Open Supply Hub Team with questions, feedback, or ways we could collaborate on taking this work forward.

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