

HUMAN RIGHTS IMPACT ASSESSMENT FRAMEWORK

Companies are increasingly engaging in Human Rights Impact Assessments (HRIAs). To assess the quality of company-commissioned HRIAs, Oxfam has developed criteria that cover both process and content. They are key to ensuring that the research captures all relevant adverse risks to human rights, to support companies in understanding how their practices have an impact on adverse risks, and to lead to systemic and sustainable improvements for workers and rights holders. For companies that fulfill all of the criteria, the HRIA will qualify as robust. Otherwise, the framework will help to identify the main weaknesses and areas where they must improve.

WHAT IS THE HRIA ASSESSMENT FRAMEWORK?

Companies are increasingly engaging in Human Rights Impact Assessments (HRIAs) in (high-risk) supply chains. HRIAs are crucial to understanding, identifying, and addressing the adverse impacts of business practices on human rights in the supply chain.

To assess the quality of company-commissioned HRIAs, Oxfam has developed specific criteria that cover both process and content. The HRIA elements outlined below are drawn from internationally agreed standards and principles enshrined in the [UN Guiding Principles on Business and Human Rights](#). They are key to ensuring that the research captures all relevant adverse risks to human rights, to support companies in understanding how their business practices have an impact on adverse risks, and to lead to systemic and sustainable improvements in working conditions for workers and small-scale farmers in global food supply chains.

This document aims to guide Oxfam colleagues when assessing the quality of an HRIA produced by a company. Oxfam will review the HRIAs carried out by the company using this framework, and will provide feedback to the companies on the quality of the HRIAs they produce.

For companies that fulfill all of the criteria, Oxfam will qualify their HRIAs as robust because they meet best practice standards. When companies do not meet all of the criteria, Oxfam will use this framework to identify the main weaknesses and areas where they must improve.

This document also includes guidance boxes which provide additional information and resources to the team, specifying when possible what represents minimum standard versus best practice. The content in the boxes also offers resources for users who want to delve deeper into some of the topics.

HOW SHOULD YOU USE THE HRIA ASSESSMENT FRAMEWORK?

The HRIA assessment team will need to document the steps taken to cover the different aspects set out below, provide a detailed explanation of how the team has addressed those elements, and explain the rationale for the choices made. Companies should specify, in the table, the sections and pages where the information can be found in the HRIA. If the information is not provided in the HRIA, then the company should specify where this information can be found externally (website, other publication, etc.). We expect companies to fulfill all the criteria.

Finally, it is crucial to remember that an HRIA, while an important tool for companies' due diligence, must be part of a wider process of human rights due diligence (HRDD) including a commitment to monitoring and evaluating their response to the findings of the assessment. The framework presented here focuses on the HRIA (and the action plan that responds to the findings). It is important to ensure adequate follow-up on the implementation of the action plan.

1. The research team: Experience, skills and qualities

The structure of the assessment team and the type of organization conducting the HRIA will vary from one case to another. However, the company needs to describe the selected structure and how they have ascertained that the assessors have the following expertise and experience.

Specific criteria	Location of the information	Oxfam's response
a) Independence from the company concerned (relationship with assessors is declared). If internal team, measures taken to increase objectivity of process are specified.		
b) Description of the team and selected structure.		
c) Prior engagement with rights holders and understanding of local context.		
d) Relevant expertise in business and human rights, political analysis, gender analysis, specific issues relevant to the HRIA, and research methodologies.		
Oxfam's overall assessment of criteria 1:		

SEE GUIDANCE BOX A: *The research team: Experience, skills and qualities*

2. Scope of the HRIA: Representativeness and relevance of the selected target (choice of suppliers, commodity, country)

Specific criteria	Location of the information	Oxfam's response
a) Strong rationale based on criteria of human rights risks for rights holders (saliency, severity), volume, importance of relationship with supplier, leverage, and opportunity for mitigating adverse impacts.		
b) Explanation of rationale and assessment of gaps and limitations.		
c) Where no HRIA (or relevant study) has been conducted recently. If building on the findings of an existing HRIA, this current HRIA should go further and cover new ground.		
Oxfam's overall assessment of criteria 2:		

SEE GUIDANCE BOX B: *Scope of the HRIA*

3.1 Meaningfulness of engagement: The how – data collection and conditions under which engagement is carried out

Specific criteria	Location of the information	Oxfam's response
a) Detailed explanation of the HRIA process, including its duration and acknowledgement of limitations.		
b) Measures taken by the assessor to create a safe space to ensure the security of informants (if the HRIA is conducted by the company, rights-holder engagement must be done by an independent third party).		
c) Equality and non-discrimination: gender consideration in data collection and engagement.		
d) Informed participation (information about project and process, interviews, and material provided in participants' own language; capacity-sharing undertaken)		
e) Timing of engagement takes into consideration rights holders' responsibilities and day-to-day reality, such as the harvest period.		
Oxfam's overall assessment of criteria 3.1:		

SEE GUIDANCE BOX C: *The How*

3.2 Meaningfulness of engagement: The who		
Specific criteria	Location of the information	Oxfam's response
a) Detailed explanation of choice of sample, with gender breakdown.		
b) Engagement with rights holders who have divergent views, with a focus on most vulnerable groups.		
a) Meaningful sample of participants from each of the following relevant groups: <ul style="list-style-type: none"> • Business relationships linked to the impact (representative sample); • Farmers in the focal supply chain, smallholder farmers or farmer cooperatives (if relevant); • Workers (including migrant workers), workers from other farms, workers' families, workers from other stages of the supply chain—if relevant to the assessment (e.g. packing plant, transformation, stores, and distribution centers); • Workers' associations, trade unions; • Affected communities, including minority and vulnerable groups; • Civil society organizations, women's rights organizations and indigenous groups, religious leaders and/or relevant religious organizations; • Government representatives from the relevant ministries; • (home and host country) local and regional authorities; • Labor inspectors; • Traditional leaders; • Company representatives from different departments (not only CSR), including purchasing department, senior management, and former company employees; • Industry-level organizations (if relevant). 		
Oxfam's overall assessment of criteria 3.2:		

SEE GUIDANCE BOX D: *The who*

3.3 Meaningfulness of engagement: The what

Specific criteria	Location of the information	Oxfam's response
a) Explanation of the issues stakeholders and rights holders were engaged on and how the priorities were identified.		
b) The findings must be communicated to stakeholders and rights holders (in a language they can understand).		
Oxfam's overall assessment of criteria 3.3:		

SEE GUIDANCE BOX E: *The what*

4. Strength of the human rights analytical framework		
Specific criteria	Location of the information	Oxfam's response
a) Methodology used includes all internationally recognized human rights, understood at a minimum as those expressed in the <u>International Bill of Human Rights</u> , the 9 core UN human rights treaties (see <u>the Office of High Commissioner website</u>), and the principles concerning fundamental rights set out in the International Labour Organization's <u>Declaration on Fundamental Principles and Rights at Work</u> . This framework is the basis on which the relevant human rights will be selected for the HRIA (see table 5).		
b) Detailed legal framework presenting the minimum requirements for the different rights selected (including international and national legislation and other relevant requirements).		
c) Accountability: different levels of responsibility and obligation are recognized; duty-bearers and rights holders are identified.		
d) Transparency: the HRIA is publicly available (covering all the elements included in the framework) and easily accessible. In a context where some elements should not be disclosed for security reasons, an agreement must be reached on what information will be withheld.		
e) Inter-relatedness and indivisibility of human rights: the HRIA acknowledges that a single situation can have an impact on several different human rights.		
Oxfam's overall assessment of criteria 4:		

5. Robustness of the assessment of the company's human rights impacts		
Specific criteria	Location of the information	Oxfam's response
a) HRIA identifies actual and potential human rights impacts (the focus is on adverse impacts on rights holders rather than offsetting with positive impacts).		
b) The impacts are substantiated with data collected directly from rights holders, including from participants with divergent views. The HRIA provides concrete examples and quotes from rights holders. The HRIA should include the concerns of rights holders even if the company and other actors do not share them. The company must acknowledge the concerns and take steps to investigate further.		
c) The HRIA provides a detailed analysis of the impacts. Findings are triangulated (rights holders, company, and other stakeholders), and substantiated with different kinds of evidence, including quantitative data (when relevant).		
d) Assessment of the severity of impacts to determine which impacts to address first (judged by their scale, scope and irremediable character).		
e) There is a disaggregated gender-based analysis and recognition of the intersectionality of impacts.		
f) The choice of selected human rights to be clearly specified and explained. The choice must reflect meaningful rights-holder engagement.		
g) Attribution of impacts: the HRIA specifies the degree of responsibility and role of the company in the impact (i.e. it causes or contributes to the impact through its own activities, or those that may be directly linked to its operations, products or services through its business relationships).		
h) Root cause analysis: The HRIA looks at structural drivers of human rights impacts and how the company has an impact on them. Impact of the company's own corporate policies and practices: <ul style="list-style-type: none"> • Purchasing practices of the company, such as the ones identified by the <u>ILQ</u> (contract clauses, technical specifications, order 		

<p>placement, prices and market power);</p> <ul style="list-style-type: none"> • Effect of marketing choices on the suppliers (leading to pressures on price, quantities, lead times); • Supplier relationships (system of prioritization, engagement, length of contract); • Advocacy (e.g. engagement in multi-stakeholder platforms), if relevant. 		
<p>i) Political economy and national context: the HRIA should identify relevant elements that can have an impact on the enjoyment of human rights such as:</p> <ul style="list-style-type: none"> • Level of poverty and living wage/income in the country; • Underlying gender inequalities; • Trade agreements; • Worker mobility agreements between governments. 		
<p>Oxfam’s overall assessment of criteria 5:</p>		

SEE GUIDANCE BOX F: *Analysis of companies’ contributions*

6. Appropriateness of the recommendations		
Specific criteria	Location of the information	Oxfam's response
a) Recommendations cover all the human rights impacts identified and offer a reasonable means of addressing the impacts.		
b) There are gender-specific recommendations.		
c) Recommendations are directed to the company: to undertake actions of its own accord, to use its influence with the government, as well as—where possible—collaborate with existing efforts and actors working on the issues.		
d) Recommendations address the company's purchasing practices and business model (including its relationships with suppliers).		
e) Recommendations are developed by the assessor/third party. They don't need to be agreed by the company commissioning the HRIA. In cases where the HRIA is conducted by the company, rights holders must be engaged in the design of the recommendations and there must be a third party to validate the findings and recommendations.		
Oxfam's overall assessment of criteria 6:		

SEE GUIDANCE BOX 6: *Developing solid recommendations*

7. Include a time-bound action plan		
Specific criteria	Location of the information	Oxfam's response
a) The HRIA is part of the broader human rights due diligence (HRDD) process. The company should clarify how the findings will be addressed and where the HRIA fits into its ongoing due diligence. To do so, the company commissioning the HRIA must develop an action plan for addressing the issues.		
b) If the company cannot release the action plan at the same time as the HRIA, there must be a clear commitment with a specific date for the publication of the action plan less than six months after the publication of the HRIA.		
c) The action plan should: <ul style="list-style-type: none"> • Specify the resources allocated and roles and responsibilities to implement the proposed measures; • Include a timeline to address all adverse impacts identified; • Show how the root causes will be tackled by the company, including how to collaborate with existing efforts and actors as well as new strategies to be implemented; • Specify the expected outcomes for the rights holders; • Specify how the company will monitor the efficiency of the proposed measures. 		
Oxfam's overall assessment of criteria 7:		

SEE GUIDANCE BOX H: *Turning the findings into concrete changes*

GUIDANCE BOXES

BOX A: THE RESEARCH TEAM – EXPERIENCE, SKILLS AND QUALITIES

There are various possible combinations for the composition and structure of the assessment team. The structure is up to the implementing partner and will vary from one case to another. No matter how the team is composed and structured, it is imperative that the nature of the relationship between the assessor and the company be stated and to seek as much independence from the company as possible.

A company could decide to undertake the HRIA with an internal team. This scenario is possible if the company has the internal capacity. Taking a lead role on this process can further develop the capacities of the entire company with regards to human rights. This should be clearly stated in the HRIA report and the measures taken to increase the objectivity of the report should be explained.

In cases where not all the relevant skills are already present in the team, collaboration with other experts can be useful. The process can be led by a local NGO with support from external experts, or by a third party who has strong connections with local experts or local community members. The assessment team must have the credibility/ability to challenge the company and the skills to engage with the various departments. The assessor should maintain editorial control over the content of the assessment.

Engaging with rights holders is an important component of an HRIA. Therefore, it is important that the assessor has existing experience in engaging with rights holders or at least the capacity to gain their trust. This should be explained in the methodology. Someone in the team must have the ability to translate the issues raised by the communities for the company. The person conducting the rights-holder engagement must be able to speak the local language.

An HRIA should provide an opportunity to learn and further develop the capacities of the different actors involved in the process. It is best practice to engage in capacity-sharing, both in terms of human rights and in understanding of local contexts. Considering that an HRIA is not an end in itself, the ongoing learning will be beneficial to all of the HRDD efforts undertaken by the company and its partners.

BOX B: SCOPE OF THE HRIA

Given the complexity of a supermarket supply chain, it is not possible to cover every stage of the chain in a single HRIA exercise. The assessment will need to focus on a selected target (commodity, country, supplier) and the rationale for this choice needs to be well explained, including its limitations. While various criteria can be taken into consideration—including the volume produced/purchased and the importance of the relationship with the supplier, the most important criteria should be the saliency and severity of the human rights risks for rights holders. These risks must always be at the forefront of decisions about which targets to select. Companies (or third-party assessors) should not go for quick wins that could distort the results of the HRIA by privileging other criteria such as leverage or opportunities for risk mitigation. The emphasis must be on risks for rights holders rather than risks for the company.

An initial mapping exercise of the company's current policy commitments (such as its purchasing practices and human rights key performance indicators) against the full range of human rights can help identify gaps that the HRIA can then examine more closely.

In cases where a human rights risk assessment (scoping) has been conducted as part of the company's HRDD process, the HRIA should focus on the highest-risk supplier and/or high-risk commodity. If an HRIA has already been conducted on a high-risk commodity, the company should build on the existing study and use the opportunity to go further and cover new ground. There is no need to duplicate what has already been developed. The findings could serve as a basis to undertake concrete actions on those identified impacts.

BOX C: THE HOW

CONDITIONS UNDER WHICH THE ENGAGEMENT IS CARRIED OUT

It is imperative that the interviews with workers and rights holders be conducted in the safest conditions possible:

- The conditions in which the interviews take place (location, number of people present, etc.) must be as safe as possible.
- Workers must be given the option to do the interviews offsite if preferred.
- Participants must have the choice to keep their identity confidential.
- Rights holders must be able to speak in their own language and the engagement strategy must be culturally appropriate.
- No company representative should be present during the interview with workers so that workers can speak freely without any fear of retaliation.

In cases where the company conducts the HRIA, it is crucial that rights-holder engagement be carried out by an independent third party. This is to ensure that the process meets its objective of obtaining a realistic and comprehensive picture of all the human rights issues faced by rights holders. Rights holders and workers must have the ability to speak freely, without censoring themselves and without fear of retaliation. The company should ask a trusted entity to review its methodology prior to undertaking the HRIA, and also to review the findings and recommendations.

WHAT DOES IT MEAN TO INCORPORATE GENDER CONSIDERATION?

- Women, and people of all genders, should be given the option of talking to the assessor separately so that they are able to speak without fear of discrimination. Women should be able to speak with a woman interviewer.
- The interview must be conducted in a location that women can access safely, and the time of the interview must be respectful of any additional household responsibilities that women may have (unpaid care).

DIVERSITY OF DATA COLLECTION METHODS:

The strategies to engage with stakeholders and rights holders will vary depending on the context and the group of participants. It is best practice to use a diversity of participatory methods appropriate for engagement, which would include:

- **Direct engagement with rights holders:** Ideally, the engagement would be undertaken through direct interviews and focus groups with rights holders. But in certain contexts, other strategies can be used, including surveys and direct observation.
- **Data from third parties:** Many human rights issues have already been documented by credible sources. The assessment team should undertake a comprehensive literature review, which could include grey literature such as civil society and media reports. When possible, it is also good practice to include a collection of appropriate quantitative data.

- **Data collected from the company on its business practices:** Looking at commercial data such as sourcing volumes, trends, and pricing allows companies to track the shared value at each stage of the chain and capture changes over time. Data on the cost of living and living wages in the country of production can help identify root causes of human rights issues. Such data will also allow comparisons with data from interviews.
- **Engagement with government:** Company-commissioned HRIAs should include interviews with the government at different levels. This engagement can raise awareness of human rights issues on both sides. It should not be used by companies to hide behind government inaction or its lack of enforcement of existing legislation. It should enable them to identify existing initiatives that they could support to address the root causes of human rights impacts and explore new opportunities to respond to the issues.

THE DURATION OF THE HRIA PROCESS:

A solid HRIA is a thorough process that requires time and resources to enable a high level of engagement and deep dive into the human rights situation in corporate activities or a supply chain. While it is not possible to dictate a specific timeframe for the entire exercise, the **duration must be commensurate with the scope of the HRIA**. At a minimum, there should be significant time spent with rights holders to engage meaningfully. The time will vary depending on the location, the distance between the facilities and the number of workers. In Oxfam's experience, HRIAs usually require no less than six months and can often take up to a year.

At the level of best practice, an HRIA would be carried out over a period of time that would allow the assessors to develop trusting relationships with local communities and provide them with the conditions to share their experiences openly. For example, community-based HRIAs adopt a more participatory approach that may allow for more information to be brought up organically by community members. This type of HRIA usually requires between one year and 18 months.

The timing of the engagement is highly important and must take into consideration the specific context. For example, when seasonal workers are recruited in their country of origin, it may be relevant to start the data collection in their country of origin (when the selection takes place), and continue during their transit and working period, until their return to their country of origin. It is possible that no impact will be found if the data collection takes place after the harvest period, for example (e.g. no mechanisms to raise workers' complaints for salaries not received). Therefore, tracing the workers' whole experience from the outset can provide rich information and improve understanding of the causes of the human rights violations observed.

BOX D: THE WHO

The HRIA must include a detailed explanation of the methodological approach to selecting a sample, including the limitations. It is not easy to decide on an exact number of people to engage with, as it is highly context-specific. Nevertheless, the HRIA must include as many interviews as possible with the highest number of affected rights holders. This requires stakeholder mapping and scoping exercises at the outset to accurately capture all relevant relationships and any potentially affected rights holders.

To be meaningful, the engagement must have the following elements:

- The HRIA must engage with the **people directly affected by the company's activities**. Local stakeholders include, but are not limited to, local workers (as represented by workers' unions or, where this is not possible, other workers' organizations), smallholder farmers or farmer cooperatives, and other affected community members (e.g. family members of the workers, local indigenous communities, etc.).

- Engagement must be **inclusive and gender-sensitive**: Companies must reach out to a wide range of actors, including people with divergent views. They must make special efforts to engage with women separately and include other vulnerable groups who could be affected differently.

Given the complexity of supermarket supply chains, the question of how many suppliers to engage with is also highly relevant but very complex. The strategy will again depend on the context, the country and the commodity. It will vary according to whether there is fragmented production or whether there is one single point of production.

MINIMUM STANDARDS BASED ON OXFAM'S EXPERIENCE: OXFAM HRIA ON SOK CORPORATION

For Oxfam's HRIA of SOK Corporation, the engagement was mainly carried out through interviews and roundtable discussions, with a total of 73 individuals engaged. In Oxfam's experience, engaging any fewer than 50 rights holders is not sufficient to capture the range of issues faced by the various sub-groups. Best practice would be to engage with a higher number, around 100 participants. It is recommended that 5–10 % of staff be approached for an interview. The disaggregated portrait of who was engaged and the stakeholder group must be included in the methodology or in an annex.

EXAMPLE OF BEST PRACTICE WORKER CONSULTATION: OXFAM IN VIETNAM UNILEVER STUDY METHODOLOGY

The researchers visited Unilever's operations at Cu Chi, near Ho Chi Minh city, where 700 workers were directly employed by Unilever and 800 more were employed by a labor provider to carry out simple processes such as packing and cleaning. The researchers interviewed both managers and workers. Worker interviews were a mix of individual and group formats, both onsite and offsite. The researchers visited three suppliers and conducted interviews with managers and workers using a similar format to the one used in Unilever's factory. In total, 198 interviews were conducted, of which 108 (55%) were with men and 82 (45%) were with women. Ninety-four workers were interviewed (onsite and offsite). For the onsite interviews, the research team provided criteria for the selection of management and worker participants in discussions, after which Unilever Vietnam identified individuals who met the criteria. From these individuals the research team obtained the contact details of coworkers, friends, or relatives working at the factory. Offsite interviews were then arranged after the researchers telephoned these workers and asked if they would be willing to meet with them. Most invited the researchers to their houses, where interviews lasting around one hour took place (click here for [more information](#) on this study).

ADAPTING TO THE CONTEXT

In situation where traceability is difficult, Oxfam recommends that half of the interviews be conducted with workers in different locations. A mixture of interviews with workers on farms in the supply chain, and workers who are in the same sector but may or may not be working in the supply chain, can provide a clearer overview of the human rights situation.

Meaningfulness of engagement is of course not only a question of numbers. One company could engage with 75 rights holders, using interviews and focus group discussions that would provide meaningful insights about their human rights concerns, while another company could claim to have engaged with 700 people using online surveys that would not provide the same depth of information.

BOX E: THE WHAT

Meaningful rights-holder engagement is an essential element of the HRDD process. It gives the company a better understanding of the deeper human rights issues that are at stake, but it also facilitates and enhances a continued dialogue between the business, rights holders, and other stakeholders, and strengthens the capacities of rights holders and company stakeholders to identify and address adverse impacts. The engagement must be seen as a two-way approach, in which rights holders receive information about the project and can also contribute to the identification of priorities and solutions.

An HRIA is one component of the broader HRDD process. It is important to make a distinction between the engagement for the purposes of the HRIA exercise and the ongoing rights-holder engagement for other processes (e.g. for environmental and social impact assessments). It is best practice to engage rights holders throughout the HRIA, including in the design of the process, the identification of issues, and the development of recommendations. In certain situations, it may not be possible to start the engagement when designing the process and it may be difficult to engage in the development of recommendations (for example to avoid raising false hopes). Engaging with rights holders to verify the findings can significantly improve the quality of the HRIA.

At the very minimum, engagement must take place when identifying and prioritizing the issues, during data collection, and when reporting back to rights holders. Finally, an essential part of the HRIA process is feeding back and validating the information and findings by the company with the rights holders. The company must specify when and how the findings have been communicated to rights holders. We therefore consider an HRIA without genuine rights-holder engagement insufficient to constitute HRDD.

BOX F: ANALYSIS OF COMPANIES' CONTRIBUTIONS

For Oxfam, a deeper analysis looking at the structural drivers of human rights impacts is necessary in order to capture the full range of human rights impacts connected to a company. The company must do a root cause analysis, which includes the structural drivers of how its policies and practices impact human rights. This includes looking at how the company's purchasing practices have an impact on the enjoyment of human rights (e.g. through price and lead time pressure). The analysis should be sufficiently robust and demonstrate a thorough assessment of the various structural factors. It should clearly attribute company responsibility where applicable.

The analysis should cover the political economy, which includes the prevailing context in the country and/or the industry. This includes, for example, looking at factors such as the level of poverty in the country and the existence of systemic gender inequality. The analysis should identify how the company might contribute to such human rights violations, or conversely, develop policies to avoid contributing to those violations.

As documented by UNICEF and the ILO, the lack of a living wage/income can increase risks of human rights violations such as child labor (see [COVID-19 and Child Labour: A time of crisis, a time to act](#)). Companies that are not providing living wages to their workers can impact other rights such as the right to food or the right to adequate housing. When analyzing their contribution to the human rights situation, companies must comprehensively look at how they impact human rights.

In its [Issue Brief](#), the ILO identifies the following five major business practices that may influence working conditions: “contracts clauses, technical specifications, order placement (and lead times), prices and market power, and requests for social standards. While many of these areas are heavily influenced by the buyers’ policies, we also find that the profile of the suppliers may also play an important role when explaining the working environment and working conditions.”

The HRIA must therefore address these factors in order to fully understand companies’ human rights impacts. Any HRIA that does not include a wider structural equity point of view will not fully capture companies’ links to more endemic human rights violations and should recognize this as a limitation. While a company may not be able to solve (or be responsible for) structural issues contributing to human rights violations, a root cause analysis allows it to prioritize recommendations and to accurately take into account the most salient human rights risks in a given area.

Where possible, the third party/provider should include a simultaneous assessment of environmental issues. It is good practice to integrate social, economic and environmental assessments to ensure coherence, as well as make methodologies less expensive.

There are not many examples of HRIAs that engage in root cause analysis. Oxfam's SOK HRIA and the community-based HRIA conducted to examine the tobacco industry in North Carolina, USA provide interesting examples:

- [The People Behind the Prices: A Focused Human Rights Impact Assessment of SOK Corporation’s Italian Processed Tomato Supply Chains](#)
- [A state of fear: Human rights abuses in North Carolina’s tobacco industry.](#)

There are also tools that exist to support companies in this crucial exercise, including:

- [EU legislation on unfair trading practices](#)
- [Improving Market Outcomes: Enhancing the position of farmers in the supply chain](#) (European Commission report).

BOX G: DEVELOPING SOLID RECOMMENDATIONS

To ensure the HRIA is truly independent, any recommendations should be developed by the third-party actor or an independent expert. Again, it is important that the assessors maintain full editorial control over the content, which includes the recommendations to mitigate human rights issues. This helps to increase the credibility of the HRIA. In the case of disagreements, the company could provide its own reaction to the proposed measures and findings in a separate part of the report. However, the recommendations should not be the result of a negotiation between the assessors and the company.

In cases where the HRIA is implemented by the company and the recommendations are developed by them, the recommendations must reflect what rights holders have identified as priorities and reasonable solutions.

The proposed recommendations must be sufficient to address all human rights impacts identified in the HRIA, and they must include measures tailored to address the gender impacts. While different actors may be concerned by the impacts, it is crucial that the recommendations included in the company-commissioned HRIA be directed to the company and be specific enough to be measurable and enable proper monitoring.

The recommendations must go beyond existing practices to ensure reasonable solutions to mitigate the human rights impacts identified. It is important that recommendations build on rights holders’ concerns and priorities. It is best practice to engage rights holders in identifying strategies to mitigate the human rights impacts. The recommendations should address purchasing and trading practices as a means to address living wage/living income (e.g. fair trading practices, long term contracts, etc.).

BOX H: TURNING THE FINDINGS INTO CONCRETE CHANGES

HRIAs should not become a box-ticking exercise. Once impacts are identified, companies must take action to remediate those impacts and prevent additional ones. Companies are expected to convert the findings and recommendations into a time-bound action plan in order to achieve meaningful changes in their business practices.

While best practice is to publish the action plan at the same time as the HRIA, we recognize that such plans can require additional time to develop.

However, companies must communicate these plans less than six months after the publication of their HRIAs. The HRIA must be seen as one step in an ongoing due diligence process, not the end point.

Companies will need to revisit their HRIAs on a regular basis to reassess the situation and identify new human rights impacts that may have arisen. The action plan should specify how the company will implement the proposed measures and assess their effectiveness.

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