

Report

FOCUS ON LABOUR EXPLOITATION

A seat at the table? Lessons from testing worker- centred human rights due diligence in outsourced services

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This publication was written by Joe Morris and edited by Ana-Sofia Baillet and Lucila Granada at FLEX. This report presents findings from a five-year project led by Ana-Sofia Baillet, Business and Workers' Rights Manager. It draws on practical learning from FLEX's pilot on worker-centred human rights due diligence in outsourced service supply chains, including engagement with businesses, suppliers, civil society organisations and workers.

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Focus on Labour Exploitation (FLEX) is a research, policy and practice organisation working towards an end to labour exploitation. For over a decade, we have worked with businesses, policymakers, trade unions and civil society to prevent labour abuse, protect workers' rights, and develop worker-centred approaches to responsible business conduct through research, evidence-based advocacy and stakeholder engagement.

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Glossary

Buyer The organisation that commissions outsourced services from a supplier (used interchangeably with “business” where appropriate in this report).

Civil Society Organisation (CSO) An independent organisation that advances labour, social or human rights and may support worker engagement, interpret labour risks, facilitate dialogue or strengthen accountability.

Human Rights Due Diligence (HRDD) The process through which organisations identify, prevent, mitigate and account for how they address actual and potential human rights impacts.

Independent worker engagement Worker engagement carried out by an organisation that is accountable to workers rather than to employers, industry or commercial interests, allowing workers to share their experiences confidentially and voluntarily.

Non-core services Services that fall outside an organisation’s primary business activities and are commonly outsourced, such as cleaning, security, catering or facilities management.

Outsourced services Services delivered by workers engaged by a supplier rather than directly by the buying organisation, such as cleaning, security or facilities management.

Procurement The business function responsible for purchasing goods or services and shaping many of the commercial conditions under which suppliers operate.

Supplier The organisation that employs workers and delivers outsourced services on behalf of a buying organisation.

Worker-centred HRDD An approach to HRDD that places workers’ experiences, participation and evidence at the centre of understanding risks, making decisions and improving working conditions.

Acronyms / Abbreviations

CSO	Civil Society Organisation
FLEX	Focus on Labour Exploitation
FPAR	Feminist Participatory Action Research
HR	Human Resources
HRDD	Human Rights Due Diligence
KPI	Key Performance Indicator
NGO	Non-Governmental Organisation
UNGPs	UN Guiding Principles on Business and Human Rights
WCHRDD	Worker-Centred Human Rights Due Diligence

1. At a glance

Five years of testing worker-centred HRDD: what did we learn?

Over the past five years, FLEX has worked alongside outsourced workers, businesses, suppliers, trade unions and civil society organisations to test what it takes to put workers at the centre of human rights due diligence in practice.

We started with a simple question: **what happens when the experiences of outsourced workers are brought into the decisions that shape their working lives?**

Our experience showed that it is possible – and that it can lead to meaningful change. But it also showed that hearing from workers is only the beginning. What happens next depends on whether businesses, suppliers, and other key actors have the relationships, structures and decision-making processes needed to act on what workers say.

What we learned

1. Worker experiences need somewhere to go.

Listening to workers does not automatically lead to better decisions. What workers share needs clear routes into the teams and processes with the power to act from operations to supplier management to procurement and contract renewal. This is one of the strongest findings in the business section.

2. Responsibility may be shared, but action still needs an owner.

In outsourced services, working conditions are shaped by decisions made by both buyers and suppliers. Asking “who is best placed to change this?” can be more useful than trying to assign every issue to one organisation. This helps turn shared responsibility into practical action.

3. Start with what matters to workers – and what can realistically change.

Worker-centred HRDD does not have to begin with sophisticated systems or perfect processes. Practical improvements can address immediate worker priorities while building the relationships, confidence, and organisational capacity needed for more ambitious change. The pilot found that trying to move faster than supplier capacity could actually slow progress.

4. What exists on paper and what workers experience are not always the same thing.

Policies, management information and supplier reporting tell us how systems are intended to work. Worker evidence shows how they are experienced in practice. Bringing the two together provides a much stronger basis for understanding risk and identifying improvements.

5. Trust and independence have to be designed into the process.

Independent engagement can create opportunities for workers to speak openly, but independence alone doesn't create trust. Workers need to understand who is involved, what will happen to the information they share, how they will be protected and what they can realistically expect to happen afterwards.

6. Lasting change means connecting better practice to the systems that sustain it.

Improvements are more likely to last when they become part of how organisations make decisions: who owns them, how buyers and suppliers work together, and how responsible practice is recognised through procurement and contract management. Independent CSO involvement can continue to add value, but it should strengthen organisational responsibility rather than substitute for it.

What this report offers

This is not a blueprint or another HRDD framework. It is a practical account of what happened when we tried to put worker-centred HRDD into practice: what worked, what got stuck, what changed, and what we would do differently.

The report is organised around businesses, suppliers and CSOs, with practical examples and questions that each can use to think about their own role. The sections can be read independently, depending on where you sit within an outsourced service relationship.

The bigger lesson

Across the project, one lesson consistently emerged: workers' experiences can tell us where change is needed, but listening alone does not create change.

Change happens when worker evidence reaches the people who can act on it; when buyers and suppliers understand where responsibility and decision-making power sit; when organisations are prepared to adapt their own practices; and when workers can see what happened as a result of speaking up.

The pilot showed that worker-centred HRDD in outsourced services like cleaning, security, and logistics can be practical, meaningful and capable of changing organisational practice. The next question is how we build on that learning – moving beyond improvements in individual workplaces and supply chains to raise the baseline for responsible outsourcing more widely.

2. Introduction

What is this report?

Over the past five years, we've worked alongside workers, businesses, suppliers and civil society organisations (CSOs) to test what it really takes to put workers at the centre of human rights due diligence (HRDD) in outsourced service supply chains.

We wanted to answer a simple question: **what happens when the experiences of outsourced workers are brought into the decisions that shape their working lives?**

Outsourced workers are essential to how organisations operate, from cleaning and security to logistics and facilities. Yet they can be structurally distant from the businesses that rely on their work. They may work in the same workplace every day but be employed by another organisation, managed through a supplier, and have little contact with the people making decisions about their work. At the same time, decisions about procurement, contracts, facilities and staffing expectations can directly affect their working conditions.

This report brings together what we learnt from exploring **what it takes to close some of that distance and give outsourced workers a seat at the table.** Along the way, we tried different approaches, adapted our methods, learnt from setbacks, and saw first-hand what helped create meaningful change for workers.

It's not a blueprint or a HRDD framework. Instead, it's a practical guide based on experience: what we tried, what worked, what we'd do differently, and the examples that helped shape our thinking.

For us, a worker-centred approach means more than asking workers for their views. Workers brought valuable understanding of where risks existed, helped shape practical responses, and contributed to assessing whether changes on paper made a difference in practice. A worker-centred approach is also an ongoing process: it involves meaningful engagement throughout, acting on what workers share, and closing the loop by bringing learnings and updates back to workers.

Why this report?

The importance of worker engagement in HRDD is now widely recognised. International standards and guidance have helped build a shared understanding of why worker engagement matters and encouraged businesses to work more closely with workers, suppliers, and other stakeholders.

In our work, we found that organisations were asking a different question: what does this actually look like in practice for outsourced services? How do you engage outsourced workers who rarely meet the company making decisions about their work? How do you involve suppliers without undermining trust? And how do you turn what outsourced workers tell you into meaningful improvements?

We explored these questions by piloting a worker-centred approach in outsourced service supply chains, working alongside businesses, suppliers, workers and CSOs. The lessons in this report come from testing those ideas, and we hope they help others build on, strengthen and adapt worker-centred HRDD in their own contexts.

What does this report explore?

Throughout the report, we explore three questions:

- What does a worker-centred approach to HRDD look like in practice?
- How can businesses and their partners create meaningful opportunities for workers' experiences to shape decisions?
- What can others learn from putting these ideas into practice?

Why focus on outsourced service sectors?

Outsourced service workers keep workplaces, businesses and public spaces running every day. Cleaners, security guards, logistics workers and many others play an essential role in how organisations operate, yet they are often less visible within the organisations that rely on their work.

These sectors also present some of the most complex environments for HRDD:

- **Shared responsibility:** Workers may be employed through suppliers or subcontractors, meaning responsibility for their working conditions is shared across several organisations. This can make it harder to know who should act when problems arise.
- **Dispersed workforces:** Workers may be spread across multiple locations, making it harder for businesses to understand what day-to-day working conditions are really like across their operations.

- **Different working patterns:** Many outsourced workers work alone, at night, across multiple sites, or outside standard working hours, making it more difficult to reach them and involve them meaningfully in HRDD.
- **Limited visibility and voice:** Workers may rarely meet the businesses whose workplaces they clean, secure or support, despite being directly affected by the decisions those businesses make.

Outsourced services offered an opportunity to contribute to an area that has received less attention within HRDD. While much of the discussion around HRDD has focused on global supply chains and the production of goods, businesses also rely on large, outsourced domestic workforces delivering essential services every day.

We began with outsourced cleaning because it is a high-risk service sector where many of these challenges are particularly visible. Throughout the pilot, however, we found that the learning extended well beyond cleaning. The approaches we developed, and the lessons we share throughout this report, are intended to help organisations working across a wide range of outsourced service sectors, and in other contexts where similar risks exist.

How was this report developed?

The approach evolved throughout the pilot, with workers' experiences shaping the methodology at every stage.

We tested different ways of engaging workers and suppliers, identifying risks, communicating findings, tracking progress and supporting remedy. At each stage, we refined the approach to reflect the practical realities of putting it into practice.

Who is this report for?

This report is for anyone involved in improving working conditions in outsourced service supply chains, whether you're procuring services, shaping strategy, making day-to-day decisions or supporting workers on the ground.

It will be particularly useful for:

- **Businesses** (sustainability, procurement, operations, and human rights teams) looking to strengthen how they understand and respond to labour risks in outsourced services.
- **Service suppliers** responsible for delivering the outsourced services and working with clients to improve working conditions and service delivery.
- **CSOs** (NGOs, trade unions and practitioners) supporting HRDD and fair work.

We also produced a separate report for outsourced workers, which was shared through different channels, including audio messages, to make the findings accessible to the workers who had contributed to the research.

How to use this report

We have organised this report around three key actors involved in outsourced service supply chains:

1. **Businesses**
2. **Suppliers**
3. **CSOs**

Rather than following the stages of the HRDD process, we have chosen to focus on the institutions involved in shaping conditions across outsourced service supply chains. Our experience showed that worker-centred HRDD depends not only on what happens at each stage of the process, but also on how these actors work together. This structure allows the examples, language, and practical guidance to be tailored to each audience, making it easier for readers to focus on the lessons most relevant to their role.

Each section can be read independently. Together, however, they show how action across the whole system, from business decisions and supplier practices to worker participation and the role of CSOs, is essential to worker-centred HRDD.



3. Businesses

3.1 Why start with businesses?

Businesses often sit furthest from outsourced workers, yet they shape many of the commercial conditions that influence workers' day-to-day experiences. Decisions about procurement, contract design, pricing, service specifications, and internal governance all affect what suppliers can realistically deliver and, ultimately, the conditions workers experience on the ground.

That's why we begin with businesses. Throughout the pilot, we found that many challenges experienced by suppliers and workers could be tracked back to decisions made much earlier in the supply chain, from how services were commissioned and managed to how responsibility for worker issues was understood within the business.

What do we mean by “the business”?

In this report, “business” refers to the organisation that commissions outsourced services and relies on suppliers to deliver them. This includes functions such as procurement, sustainability, operations, human resources, legal, and human rights, all of which influence how outsourced services are designed, managed, and monitored.

While suppliers are responsible for managing the service and employing workers, businesses shape many of the commercial conditions in which those services are delivered.

3.2 What we wanted to understand

We wanted to understand what it takes for worker evidence to influence the decisions that shape working conditions in outsourced service supply chains.

To explore this, we worked with colleagues across sustainability, procurement, legal, operations and human resources. We wanted to test a simple assumption: that meaningful worker evidence could help create alignment across different parts of the business and support better decision-making.

What we learned was that evidence alone isn't enough. Worker experiences can provide valuable insight into risks and opportunities for improvement, but they need clear pathways into business decision-making processes to have an impact.

More than any other factor, internal alignment across relevant teams made the biggest difference during the pilot. Where teams shared a common understanding of why worker-centred HRDD mattered, had clarity on their roles, and worked towards the same objectives, worker engagement was much more likely to move forward. Where responsibilities were unclear, or priorities differed, progress was more difficult.

What makes worker-centred HRDD possible?

Businesses are better prepared to engage with outsourced workers when they have:

- Leadership, sponsorship and decision-makers aligned across key functions
- Alignment and shared ownership across relevant teams such as procurement, legal, and operations (not only sustainability)
- Clarity on what they want to achieve, what is feasible, and the time, resources and budget needed to act on what they hear
- Agreement on how worker insights will be used, acted upon and communicated back

Figure 1: From worker experiences to business action



Worker-centred HRDD isn't just about gathering worker perspectives. It's about creating pathways for those perspectives to influence decisions and lead to meaningful improvements

3.3 What we learned in practice

The following case studies bring together some of the key challenges we encountered during the pilot. Each one explores what we were trying to achieve, what we tested, what worked (or didn't), and the lessons we took away for future practice.

A. When worker evidence reached the business, but not the decision-makers

The Challenge

One of the assumptions we tested through the pilot was that providing businesses with meaningful worker evidence would naturally lead to better decisions.

It didn't always. Instead, we found that the biggest barrier was not lack of worker evidence, but the way responsibility for outsourced services was divided across different business functions.

One example involved teams responsible for sustainability, operations and human rights recognising workers' concerns about inconsistent shift allocation, short-notice changes to shifts, differences between sites, and limited access to managers. However, responsibility for managing the relationship with the service provider sat elsewhere in the business, while procurement and legal influenced contractual requirements. Although there was broad agreement that the issues needed to be addressed, responsibility and authority for implementing the necessary changes were divided across functions. Teams were often cautious about stepping into areas seen as belonging to other functions, making greater communication and coordination between teams important. As a result, worker evidence often remained within a single function rather than influencing the wider business decisions needed to improve working conditions.

As one worker explained:

“The most important thing is to be heard, because the company does not really know what is happening at work.”

Workshop participant, Spanish-speaking cleaners, 22 November 2025

For example, workers shared that companies may not know that workers are being paid the National Minimum Wage, despite their supplier contract requiring them to be paid the Living Wage.

What we tried

We brought together the different business functions involved in outsourced services to discuss worker evidence collectively. Rather than treating workers' experiences as isolated concerns for a single team to resolve, we explored how different business functions influenced those experiences and where each could contribute to improvements.

In one engagement, we shared workers' experiences of fragmented shifts across multiple sites, limited access to supervisors during early morning and late-night shifts, and uncertainty about how shifts were allocated. We used these experiences to ask practical questions across functions: should tender processes require suppliers to demonstrate how they manage lone working? Should supplier contracts set clearer expectations around shift allocation and worker access to support? Should there be clearer protocols for workers to contact a manager or supervisor during early morning and late-night shifts? This helped different teams identify where they could take action within their respective roles.

What worked

Worker evidence was most effective when it was linked to existing business decisions and priorities. For example, discussing workers' experiences of fragmented shifts alongside supplier review meetings helped operations teams see that scheduling arrangements were contributing to high turnover and inconsistent service delivery between sites. Conversations shifted from asking whether the issues were real to discussing what changes could realistically be made through contract management or operational planning such as adjusting staffing levels or shift patterns to ensure sites were adequately staffed. This made labour risks more tangible and relevant to the teams responsible for addressing them.

Where teams developed a shared understanding of the issues, and clarity about their respective roles, worker evidence was much more likely to translate into practical discussions and concrete actions.

What didn't work

One thing that quickly became clear was that shared interest alone wasn't enough. Teams often recognised the same issues and agreed that improvements were needed, but recognising a problem did not automatically lead to action. A business may have strong sustainability commitments, yet the practical levers for change often sit across procurement, supplier management, and operational delivery.

For example, concerns about workers struggling to access supervisors outside normal working hours or lack of emergency protocols for lone workers were recognised across several teams, but because responsibility sat across different functions, discussions stalled without a clear process for turning shared concern into coordinated action. This could have included agreeing an emergency protocol with the supplier, incorporating it into worker training, and establishing alternative contact channels for workers when their usual supervisor was unavailable.

Without clear internal governance and pathways into decision-making, worker evidence can remain separate from the decisions that most directly shape working conditions.

What we learned

The biggest lesson for us was that worker engagement is not a substitute for good internal governance – it is an input into it.

One of the most important lessons wasn't just about the barriers and opportunities for meaningful worker engagement, but about understanding how decisions were made inside the business. Organisations rarely made visible to external organisations how decisions flowed between procurement, operations, human resources and other functions. Instead, we had gradually built that picture ourselves through meetings, conversations and experience during the pilot.

The pilot showed us the value of mapping these decision-making processes more explicitly and systematically from the outset.

Throughout the pilot, we also found that worker evidence had the greatest potential to influence outcomes when it was connected to the teams, decision points and business processes with the power to act on it.

How would we apply these learnings in the future

In future, we would give as much attention to mapping how the business makes decisions as to planning the worker engagement itself. This would mean identifying from the outset:

- which internal teams influence the issues workers are raising;
- where authority to make changes sits;
- which issues require coordinated action across different functions; and
- how worker evidence can connect to existing decision points, such as supplier reviews, operational planning, tenders or contract renewals.

Doing this would help ensure that worker-centred HRDD is designed not only to generate insights, but to connect that evidence with the parts of the business able to act on it.

B. When legal concerns reshaped worker engagement

The challenge

One of the most significant challenges we encountered during the pilot was navigating internal legal concerns about engaging workers to identify areas of concern in their day-to-day job. While there was often support for an external NGO, such as FLEX, to engage directly with workers from sustainability and operational teams, concerns about legal liability and how direct worker engagement might affect relationships with suppliers sometimes delayed or prevented the engagement from moving forward.

This became particularly clear when plans to carry out confidential worker engagement raised questions about how sensitive information would

be documented and stored, what responsibilities the business would have if serious issues were identified and not addressed, and how those responsibilities applied where workers were employed by suppliers rather than directly by the business.

We found that conversations could stall at the point where worker experiences would move from being discussed in principle to becoming evidence that the business would need to respond to. In some cases, this happened just as we were preparing to engage workers; in others, it emerged earlier, during initial discussions with businesses about how the approach would work. At first, this appeared to be a failed engagement. Looking back, it became one of the most valuable lessons from the pilot.

What we tried

Rather than treating these decisions as the end of the process, we treated it as an opportunity to better understand how worker engagement was being assessed and where concerns were arising within the business. Were these concerns about data privacy or reputational risk? Were they linked to uncertainty about new or evolving legal responsibilities for businesses, such as those relating to third party harassment? Or were other considerations shaping the decision?

Instead of trying to persuade stakeholders that worker engagement should proceed regardless, we focused on understanding the specific governance and legal questions that were influencing the decision. This helped us identify what would need to be anticipated and addressed when designing future worker engagement, while accounting for the realities businesses face without losing sight of its purpose. In practice, this meant understanding questions such as how worker information would be collected and stored, who would have access to it, how confidentiality would be protected, and what responsibilities the business might have if serious issues were identified.

What worked

Treating governance and legal concerns as part of the design process made conversations more constructive and specific. Rather than discussing worker engagement as a simple question of whether it should or should not happen, conversations could focus on the conditions needed for it to take place safely and effectively.

This also helped us distinguish between resistance to worker engagement itself and concerns about how engagement led by an external organisation would be designed and managed. In some cases, what initially appeared to be reluctance to engage workers reflected more specific questions about risk, responsibility and organisational processes. Understanding those concerns created more scope to explore how they could be addressed through the design of the approach.

What didn't work

What proved less effective was relying on a shared understanding of what independent worker engagement would involve in practice. While there was often broad support for the principle of engaging workers independently, different interpretations of what this would mean for risk, responsibility and organisational oversight became more apparent as discussions moved towards implementation.

The pilot highlighted an important tension in how independence itself can be understood. Features of our methodology designed to protect workers, including confidentiality and independence from the business, could also raise questions for businesses about oversight, legal responsibility and reputational risk when sensitive information about their operations was being collected and held by an external organisation. These different perspectives needed to be surfaced and discussed explicitly rather than assuming that agreement on the principle of independent worker engagement meant agreement on how it should work in practice.

What we learned

The experience showed that support for worker-centred HRDD can exist within a business while still being constrained by competing internal priorities and different perceptions of risk. In most cases, sustainability teams want to proceed, operations see value in understanding workers' experiences, while legal focuses on managing potential liability. None of these perspectives are unreasonable, but they reflect different responsibilities within businesses that are not fully aligned around the purpose and design of worker engagement.

Most importantly, these experiences showed us that designing independent worker engagement means navigating the relationship between worker protection and organisational governance, including how responsibilities are distributed internally and where decision-making power sits.

The point at which worker voice becomes formal evidence is often where internal tensions become most visible. Understanding these governance dynamics is just as important as understanding supplier or worker perspectives.

How would we apply these learnings in the future

- Discuss governance, legal and data management considerations alongside the design of worker engagement from the start, recognising that businesses' perspectives may evolve as the engagement becomes more detailed.
- Be more explicit from the beginning about why independence, confidentiality and external facilitation are essential to meaningful worker engagement, while creating space to discuss how sensitive information will be managed and acted upon.
- Agree from the beginning how workers, and CSO partners will be kept

informed if engagement changes. A responsible engagement strategy should include a clear Plan B, ensuring partners are not left without communication or support if business priorities shift.

- Recognise that challenges to worker engagement can provide valuable insight into how decisions are made inside organisations. Treat these moments not as failed engagements, but opportunities to better understand governance dynamics and redesign future approaches rather than abandoning engagement altogether.

C. The “non-core” problem: why outsourced service workers are often overlooked

The challenge

Even where businesses had made commitments to HRDD or responsible procurement, outsourced service functions, particularly cleaning, were often treated as separate from the “core” business. This influenced how much attention, investment, and decision-making power was given to the workers delivering these services.

We saw this most clearly when discussions about outsourced cleaning workers were often led by sustainability teams, while operational and commercial teams viewed cleaning primarily as a contracted service rather than a workforce whose conditions could have direct implications for business performance and risk. As a result, worker issues were often seen primarily as supplier responsibilities, rather than issues that could also be shaped by the business’s decisions and practices.

This lower level of attention also reflects the relative lack of public and consumer pressure around outsourced services. While public awareness has grown around working conditions in areas such as garment supply chains, similar attention has not yet developed around the workers delivering services such as cleaning. This can make the working conditions of outsourced service workers less visible within wider business priorities.

How outsourced work is positioned within a business matters. When services are viewed as a cost to manage rather than an essential part of business operations, worker concerns are less likely to reach senior decision-makers, receive sustained investment, or influence commercial choices.

What we tried

We challenged the assumption that outsourced services are peripheral by reframing them as operationally essential to the organisations they support.

Rather than introducing worker engagement through the language of human rights alone, we started conversations with operational challenges that businesses were already trying to solve. In one discussion with a facilities management team, we moved away from asking whether cleaners had good working conditions, for example fair pay, predictable hours and adequate

breaks, and instead explored why the same sites were repeatedly experiencing staff shortages, inconsistent cleaning standards and high supervisor workload.

Using independent worker interviews, we showed how fragmented shifts across multiple buildings, short-notice schedule changes and high staff turnover were contributing to those operational issues. Instead of presenting these as separate labour concerns, we demonstrated how they affected service reliability, continuity and quality.

This shifted the conversation from “how do we improve worker welfare?” to “why is our current service model producing these outcomes?”

What worked

Making the operational importance of outsourced services more visible helped create stronger engagement across company teams. This was particularly important where teams had limited insight into outsourced workers’ day-to-day working conditions. Connecting those conditions to the quality and reliability of services helped make their relevance to different business functions more tangible, rather than discussing worker rights in isolation.

One example was when procurement colleagues saw evidence that frequent staff turnover meant the same sites were constantly training new cleaners, relying on agency cover and dealing with repeated complaints about inconsistent standards, the discussion became less about supplier compliance and more about how procurement decisions, contract specifications and scheduling arrangements were shaping those outcomes.

Operations teams also began recognising that many of the issues they were managing day to day, including missed tasks, inconsistent site knowledge and repeated staffing gaps, were symptoms of wider workforce instability rather than isolated supplier performance problems.

By linking worker experiences directly to operational performance, outsourced cleaning became part of conversations about business resilience rather than simply a supplier management issue.

As one worker put it:

“Even though I’m outsourced, I’m still working in your building every day, I am the face of your company.”

Workshop participant, Spanish-speaking cleaners, 03 August 2024

What didn’t work

We found that a general company commitment to HRDD did not automatically extend to outsourced workers. Service procurement also remained under-recognised within businesses’ human rights strategies, where goods supply chains often dominated the conversation and outsourced service workforces risked falling through the cracks.

In practice, discussions often drifted back towards familiar procurement questions, such as whether the supplier was meeting contractual KPIs on cleaning quality or staffing levels, rather than what workers' experiences revealed about how those services were being delivered. Worker evidence about fragmented shifts, unpredictable hours or high turnover was acknowledged, but these issues were often still seen as something for the supplier to resolve.

For example, when workers described travelling between several sites in one day for short cleaning shifts, the initial response was often to ask whether staffing levels met the contract specification rather than whether the service itself had been designed in a way that created fragmented work in the first place.

This reinforced that, where outsourced services had historically been treated as peripheral, worker evidence continued to be interpreted through a supplier management lens. The “non-core” framing had to be actively challenged rather than assumed to disappear once a company adopted broader human rights commitments.

What we learned

One of the biggest lessons from this pilot was that how a business thinks about outsourced services determines what it is willing to change.

Where cleaning was viewed simply as a contract to be managed, worker issues remained framed as supplier performance issues. Where cleaning was recognised as essential to maintaining safe, reliable and resilient operations, conversations became much broader. Teams started asking different questions, not only “what should the supplier do?” but also “how are our own procurement, contracting and operational decisions contributing to these outcomes?”

The pilot deepened our understanding of why this difference existed. In many businesses, outsourced cleaning was not seen as part of the organisation's core activities. It did not generate revenue, was not customer-facing, and responsibility often sat within human resources, procurement or facilities management rather than functions with greater strategic influence. We also found there was rarely a senior internal champion responsible for keeping outsourced workforce issues visible across the business.

This helped explain why worker issues often struggled to gain traction. It wasn't that businesses considered them unimportant. Rather, they competed with priorities that carried greater commercial visibility, influence, and perceived risk. As a result, worker evidence was less likely to shape procurement, operational or investment decisions.

The pilot taught us that understanding the business is just as important as understanding workers' experiences. CSOs may bring deep knowledge of working conditions and perspectives but often have limited visibility of how decisions are made within a business. Equally, business teams may understand their own structures and processes but have limited insight into the realities of outsourced workers. Worker-centred HRDD required bridging that gap. As the

work is being scoped and set up, we also need to understand how outsourced services are positioned internally, who owns the relationships, which teams influence decisions, and whether anyone has the authority to champion change. Those conversations proved just as important as the worker evidence itself.

How would we apply these learnings in the future

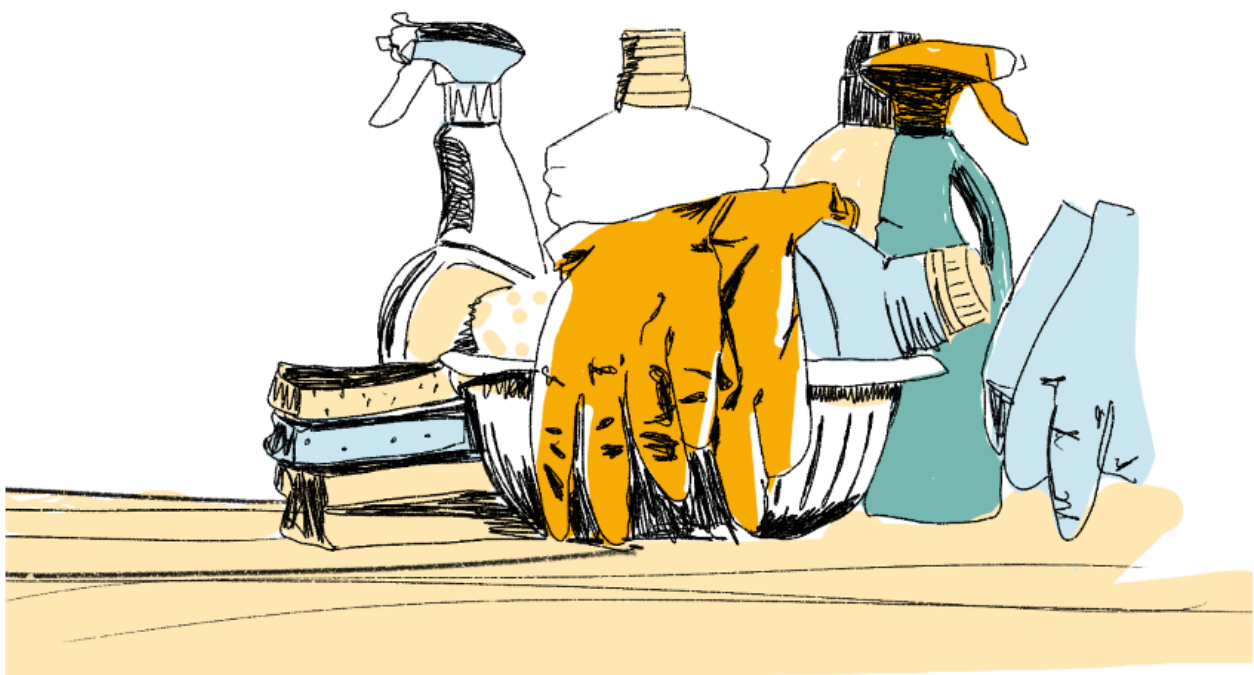
- Challenge assumptions that “non-core” services are peripheral to the business early on, by making clearer how outsourced workers and service delivery affect daily operations, customer experience and reputation.
- Include outsourced service functions in human rights strategies, HRDD governance and decision-making structures from the outset.
- Use practical examples to demonstrate how working conditions affect service quality, operational resilience, and business performance.
- Ensure outsourced workers’ perspectives are given meaningful consideration, with clear pathways for their input to reach business decisions rather than relying solely on suppliers’ processes.

In future, we would use our understanding of how outsourced services are positioned within the business to tailor the engagement. In some organisations, starting with worker rights may be appropriate. In others, demonstrating how workforce conditions affect operational performance may provide a more effective route into wider discussions about worker-centred HRDD.

As one worker reflected:

“It’s good that the company is coming to us to learn about the issues, because then they can understand them better.”

Workshop participant, Spanish-speaking cleaners, 22 November 2025



3.4 Business takeaway

Five lessons for making worker-centred HRDD work in practice

1. Leadership support matters, but effective change depends on coordination and alignment across the functions that can act on worker evidence.
2. Worker input needs clear pathways into procurement and other business decisions, not just reporting.
3. Strong worker evidence is most effective when supported by strong governance and clear ownership.
4. Internal barriers often reveal where decision-making power really sits.
5. Outsourced workers rarely become a priority organically. Creating change requires recognition of their essential role for a business.

Before beginning worker-centred HRDD, businesses should ask:

Ownership: Who inside the business is responsible for acting on worker insights?

Positioning: How are outsourced services understood across the business- as a supplier relationship, an operational function, or an essential part of business performance?

Alignment: Are procurement, operations, sustainability, legal, and HR aligned on the purpose and approach to worker-centred HRDD?

Engagement: How will workers be informed about what changed as a result of their participation?

Risk management: What happens if worker engagement changes, pauses, or cannot proceed?

4. Suppliers

4.1 Why focus on suppliers?

While businesses shape many of the commercial conditions that influence outsourced work, suppliers are responsible for translating those decisions into day-to-day service delivery. They recruit and manage workers, organise shifts, supervise teams, and respond to the operational realities of delivering services across multiple sites.

Throughout the pilot, we found that many of the challenges identified through worker engagement could not be fully understood without understanding how services were organised and managed. Suppliers provided important insight into the composition of the workforce, how work was delivered on the ground, the challenges they faced, and the decisions they were able to influence.

Throughout the pilot, supplier engagement became an important way of understanding how the outsourced service system operated in practice. It helped us see how responsibilities were exercised day to day, how commercial and operational decisions shaped working conditions, and where opportunities for improvement existed. Many of the issues workers raised became easier to understand once we saw how suppliers were delivering services.

The pilot reinforced an important feature of outsourced service supply chains that FLEX had previously identified through research with cleaners: suppliers sit between buyer expectations and worker experiences (FLEX, 2021a). They are responsible for many aspects of workers' day-to-day conditions, while navigating a supply chain where power dynamics are not always straightforward. Commercial pressures, service requirements and operational constraints can shape the conditions suppliers are able to offer, with pressure to meet cost and service expectations being passed down the supply chain and affecting workers' conditions. Responsibility for those conditions is therefore shared across the buyer-supplier relationship. As a result, supplier engagement became much more than checking whether suppliers had the right policies or procedures in place. We needed to understand how responsibility and decision-making power operated between buyers and suppliers in practice, and what enabled improvements to working conditions.

What do we mean by “the supplier”?

In this report, “supplier” refers to the organisation contracted by a business to deliver an outsourced service. This may include facilities management companies, cleaning companies, security providers, catering companies, or other service providers.

Suppliers are responsible for managing the service and employing or engaging the workers who deliver it. This includes responsibilities such as recruitment, pay, working conditions, scheduling, supervision, training, and responding to workers’ concerns.

While suppliers operate within the commercial arrangements agreed with their business clients, they have an important role in shaping workers’ day-to-day experiences and ensuring that workers’ rights are respected.

4.2 What we wanted to understand

We wanted to understand what it takes for supplier engagement to support better working conditions in outsourced service supply chains.

To explore this, we worked with suppliers delivering services alongside business teams involved in procurement, sustainability and operations. We wanted to test a simple assumption: that moving beyond a focus on contractual compliance towards a more collaborative approach with suppliers could help businesses better identify labour risks, understand where improvements were possible, and support action to improve working conditions.

The pilot also reinforced the importance of looking beyond supplier practices themselves. Improving working conditions requires understanding how services are organised, the pressures suppliers face, and how buyers’ commercial decisions shape the context in which they operate.

More than any other factor, open and constructive relationships between buyers and suppliers made the biggest difference during the pilot. Building that level of trust was not straightforward. Suppliers may depend on buyers for the continuation of hefty contracts, creating understandable sensitivities around discussing challenges or shortcomings. At the same time, buyers can be highly dependent on suppliers for the continuity of services, particularly where there are few alternative providers or switching would be difficult. These dynamics influence how openly both sides are able to discuss problems and potential improvements.

Where suppliers felt able to discuss operational challenges honestly, engagement became a process of shared learning rather than a compliance exercise. Where conversations focused primarily on performance monitoring, it was harder to understand the underlying causes of labour risks or identify realistic improvements.

We also learned that supplier engagement works best when combined with

worker evidence. Suppliers provided valuable insight into how services were organised and delivered and what operational challenges they faced, while workers provided insight into how those systems were experienced in practice. Time and again, it was the combination of these perspectives that helped explain not only what was happening, but why it was happening. Bringing these perspectives together gave us a much clearer picture of where risks emerged and what changes were possible.

4.3 What we learned in practice

The following case studies show what these lessons looked like in practice. Each one explores what we were trying to achieve, what we tested, what worked (or didn't), and the lessons we took away for future practice.

A. When the buyer was part of the solution

From the outset, we recognised that responsibility for working conditions in outsourced services often sits across both buyers and suppliers. The challenge was understanding where those responsibilities began and ended. The boundaries were not always clear; even where legal responsibilities were established, businesses varied in how they understood and acted on their responsibility for working conditions across their outsourced workforce.

For example, during discussions with one cleaning supplier, workers raised concerns about limited access to rest facilities, fragmented workloads, lone working and unsociable hours. Some of these issues sat within the supplier's control, but others reflected the client's operational requirements, building rules or the way procurement contracts had been designed.

This sometimes made conversations tricky. Suppliers felt they were being held accountable for issues they had limited authority to change, while buyers often assumed these were matters for suppliers to solve. As a result, discussions could easily become focused on who was responsible rather than what needed to change.

This reinforced an important lesson from the pilot: meaningful improvements often depend less on identifying a single party responsible for a negative outcome, and more on whose decision can unlock the change needed.

What we tried

Rather than assuming the supplier was responsible for addressing every issue workers raised, we brought the supplier and the buyer together to identify who was best placed to act on each issue.

Instead of jumping straight to solutions, we first mapped how decisions affecting each issue were made.

We grouped the issues workers had raised into three broad categories:

- issues the supplier could address directly (for example, improving communication with workers, translating contracts and workplace information);
- issues that depended primarily on decisions made by the buying organisation (such as access to rest facilities within client buildings);
- issues that required both organisations to work together, including workload planning, lone working arrangements and shift design.

We developed a simple responsibility mapping exercise to turn the idea of “shared responsibility” into a practical decision-making tool. Rather than asking whether an issue belonged to the buyer or the supplier, the exercise mapped who was best placed to act, where joint action was needed, and which decisions sat outside any one organisation’s control.

This gave everyone a clearer picture of how decisions were made and shifted conversations away from assigning blame towards agreeing practical actions.

What worked

Making decision-making more explicit changed the nature of the conversation.

For example, improving cleaners’ access to rest facilities first required a shift in how the issue was understood. Rather than viewing time away from cleaning tasks as a lack of productivity, discussions began to recognise access to appropriate rest as part of workers’ working conditions. Once it became clear that lack of access to rest facilities depended largely on decisions made by the buying organisation, discussions moved away from questioning why the supplier had “failed” and instead towards the practical changes the buyer could make to help address the problem.

At the same time, the supplier committed to improving communication with workers and translating contracts and workplace information into multiple languages, changes that sat within its own control.

Rather than producing one long list of recommendations for the supplier or business, the engagement resulted in different actions for different organisations, each focusing on the areas where they were best placed to act. This gave both organisations a clearer sense of ownership and helped move conversations from debating ownership to delivering improvements.

What didn’t work

Not every issue could be resolved through supplier engagement alone.

The approach was much less effective when the people with the authority to make decisions were not part of the conversation. Where improvements depended on procurement, workplace decisions or wider commercial requirements set by the buyer, suppliers often had limited ability to act independently, even when they recognised the problem.

Without buyers actively involved, conversations often stalled before meaningful action could be agreed. In those situations, worker engagement could start to feel like another compliance exercise for suppliers. They were expected to respond to concerns without having the authority (or budget) to address many of the underlying issues affecting service delivery.

What we learned

While we knew that responsibility for many worker issues was shared across buyers and suppliers, the pilot showed us that recognising shared responsibility is only the starting point. The challenge is turning that principle into something that can guide action in practice.

We increasingly moved away from asking whether an issue belonged to the supplier or the buyer and instead asked: “Who is best placed to change this?” This helped create clearer ownership and more practical discussions about what each organisation could do- and where coordinated action was needed.

How would we apply these learnings in the future

Looking back, we would bring buyers and suppliers together earlier to map decision-making before discussing solutions.

Rather than treating this as an exercise later in the engagement, we would make it one of the first conversations.

Together, we would identify:

- which issues the supplier can address directly;
- which require changes by the buyer;
- where joint action is needed;
- who has the remit to make each decision.



B. Starting with practical improvements, not perfect systems

The challenge

One of the questions we explored during the pilot was how suppliers with very different levels of organisational maturity could begin implementing worker-centred HRDD.

We already expected suppliers to differ in their maturity, budget, capacity and existing systems. The pilot was not testing whether these differences existed, but how engagement could be structured so that suppliers at different starting points could make meaningful progress without becoming overwhelmed. For example, one supplier already had established HR processes, regular reporting and dedicated management staff, making it relatively straightforward to discuss longer-term improvements. Another supplier was at an earlier stage of developing these systems. It had no dedicated HR manager, relied largely on operational managers to support workers, and many processes that larger organisations take for granted, such as translating employment documents, communicating policy changes consistently, or recording workforce concerns, were still developing.

Those differences quickly shaped the conversations we were having. While some suppliers saw the potential for worker engagement to inform more strategic discussions and support continuous improvement, others were more focused on day-to-day operational pressures, including staffing sites, managing client expectations and responding to immediate workforce issues.

The pilot reinforced that a single implementation approach would not work across every supplier. Progress depended on recognising where each organisation was starting from and building from there. Developing that understanding could take time: commercial sensitivities and the involvement of an external organisation, such as FLEX, meant that this information was not always available from the outset, and a fuller picture often emerged as relationships and trust developed.

The more important question was how to sequence improvements so that worker-centred HRDD felt achievable rather than overwhelming and disproportionate. Progress depended not only on recognising where each organisation was starting, but on matching the pace and focus of engagement to that starting point.

What we tried

Rather than expecting every supplier to implement worker-centred HRDD in the same way, we adapted the sequence of improvements to reflect each organisation's starting point, aiming to create early progress that could build confidence before introducing more structured due diligence processes.

For suppliers with more limited capacity, we focused first on achievable operational improvements that responded directly to issues workers had raised, while creating a foundation for more structured, longer-term change.

For example, rather than beginning with formal reporting frameworks or detailed improvement plans, the work contributed to one supplier taking practical steps such as translating contracts and workplace information into the languages spoken by its workforce, appointing its first dedicated HR manager, and introducing clearer processes for updating workers when workplace changes affected them.

For suppliers with more established systems, discussions focused less on creating new processes and more on strengthening existing ones by using worker feedback to identify gaps and improve consistency across sites.

What worked

Starting with practical improvements helped build confidence and momentum.

For example, translating contracts and workplace information was a relatively straightforward change, but it immediately addressed one of the barriers workers had repeatedly raised: not fully understanding their employment terms or workplace policies.

Similarly, appointing a dedicated HR manager gave workers a clearer point of contact when problems arose, helped the supplier strengthen communication, oversee workplace improvements and coordinate responses to issues raised during engagement.

These early improvements demonstrated that worker-centred HRDD could respond to real operational challenges without requiring suppliers to redesign everything at once. Rather than feeling they were being asked to build entirely new systems, suppliers could see how relatively small changes responded directly to issues workers had raised.

As suppliers began to see tangible progress, conversations gradually shifted from “Can we do this?” to “What should we improve next?” This helped build trust in the process and created greater confidence to discuss more ambitious, longer-term changes to governance, monitoring and continuous improvement.

What didn't work

The pilot also showed that trying to move faster than a supplier's capacity can actually slow progress.

For example, discussions about structured targets, regular reporting or comprehensive monitoring systems could feel unrealistic for suppliers who were trying to improve basic communication with workers or develop internal HR capacity.

In one discussion, conversations quickly moved towards documenting evidence and developing formal action plans before the supplier had the internal capacity to manage these processes. As conversations became dominated by systems and reporting, it was easy for the original worker issues to become secondary. Rather than creating momentum, this risked making worker-centred HRDD feel burdensome rather than a practical way to improve working

conditions.

Instead of accelerating implementation, introducing more sophisticated systems too early sometimes reduced engagement. Suppliers became focused on meeting process requirements rather than understanding how those changes would improve workers' day-to-day experiences, strengthen service delivery and, ultimately, the service they offered to the buyer.

We also found that introducing too many improvement requests at the same time could dilute progress. Prioritisation therefore became important: starting with the issues that mattered most to workers, while considering what was proportionate and achievable within the supplier and buyer context. This allowed effort to be concentrated on a smaller number of meaningful improvements that could then provide a foundation for further change.

What we learned

The key lesson was that proportionality does not mean lowering ambition. Worker-centred HRDD can maintain a clear focus on improving workers' experiences while recognising that suppliers may need different pathways and different amounts of time to get there.

This changed how we thought about supplier capacity. Building that capacity is not separate from worker-centred HRDD; it can be part of what makes sustained improvement possible. The aim is not to introduce the most sophisticated system from the outset, but to ensure that each step responds to workers' priorities and creates a stronger foundation for what can come next.

How would we apply these learnings in the future

In future, we would build in more time at the outset to develop a fuller understanding of each supplier's starting point before agreeing improvement actions. This is not always straightforward: suppliers may understandably be cautious about sharing information about internal capacity, gaps or challenges with an external organisation working alongside their client. Our experience showed that this understanding often develops gradually as relationships and trust are built.

Early engagement would therefore focus on developing a picture of the supplier's existing HR and management capacity;

- how workforce issues are currently identified and managed;
- which worker priorities could be translated into achievable early improvements;
- where the supplier may need action or support from the buyer to make improvements possible; and
- what additional support or guidance could strengthen the supplier's capacity over time.

We would then use that understanding to sequence improvements more deliberately, rather than beginning with comprehensive assessments and action plans. This would mean prioritising a small number of actions based first on what matters to workers, while considering what is proportionate and achievable within the supplier and buyer context, and using those improvements as a foundation for more structured organisational change over time.

C. When worker evidence revealed what supplier systems missed

The challenge

One of the questions we explored through the pilot was how far supplier management information reflected workers' day-to-day experiences.

Suppliers could often explain their processes with confidence. They described how workers were recruited, how supervisors communicated with staff, and what procedures existed for raising concerns. From a management perspective, these systems suggested that the right structures were already in place.

Worker engagement added another perspective, helping us understand how those same systems were experienced in practice. In many cases, workers' experiences revealed practical barriers that were not visible through management information alone.

One example was employment contracts and workplace information. Suppliers understood that workers had received the information they needed because contracts, policies and staff handbooks had been issued. Workers told us something different. Many explained that important documents were only available in English, making it difficult to fully understand their rights, responsibilities or changes affecting their work.

Worker engagement also revealed how shift patterns, working hours, location and relationships with individual supervisors could shape whether formal reporting routes were accessible in practice.

The challenge was therefore not simply whether supplier systems existed, but whether they were accessible, understood and trusted by the workers expected to use them.

What we tried

Rather than using worker evidence to assess whether suppliers were meeting expectations, we used it to understand how supplier systems actually operated day to day, and where they were not working as intended for workers.

We brought worker experiences into conversations with suppliers alongside information from management teams. Rather than asking whose account was "correct", we treated differences between the two perspectives as

opportunities to better understand where gaps existed and what might need to change.

For example, when workers explained they struggled to understand contracts or workplace information, we explored how these documents were produced, distributed and explained to staff. Suppliers understood that providing the documents met their responsibility. Worker discussions highlighted that accessibility mattered just as much as availability.

Similarly, when workers described difficulties contacting supervisors, we explored how supervision worked across different sites, including lone working, short shifts and workers moving between multiple locations. These conversations helped explain why systems that appeared straightforward from a management perspective could operate very differently in practice.

What worked

Worker evidence proved most valuable when it helped suppliers understand how their existing systems were experienced. Rather than showing suppliers that they needed entirely new processes, worker discussions often helped them identify practical ways to make existing systems work better for the people using them.

In the examples above, worker evidence helped suppliers see where existing processes were not working as intended and identify practical changes to improve their accessibility, communication and responsiveness to workers.

Similarly, conversations about supervision did not lead suppliers to redesign their management structures. Instead, they highlighted how existing arrangements could be strengthened, for example by improving communication across different sites, making managers more accessible, or thinking differently about how information reached workers who rarely saw a supervisor in person.

The engagement also prompted suppliers to think more broadly about communication. Rather than assuming information reached workers because it had been issued, conversations focused on whether workers understood it, knew where to find it, and felt safe and able to ask questions if something was unclear.

Worker evidence also highlighted that the effectiveness of supplier systems could vary considerably across sites. A communication process that worked well in one location might not work in another because of different supervisors, client environments or working patterns.

What didn't work

Bringing together worker and supplier perspectives did not automatically translate into clear solutions. In many cases, triangulating the evidence showed that both perspectives were accurate: suppliers could demonstrate that a process had been designed and implemented, while workers described

practical barriers that prevented it from working as intended in everyday situations.

For example, suppliers explained how contracts and workplace information were issued to workers, while workers described how English-only documents limited their understanding of their rights and responsibilities. Similarly, suppliers could explain how supervision arrangements operated across sites, while workers described how lone working, short shifts and moving between multiple locations made those arrangements difficult to access in practice.

Rather than producing a single “correct” account, these conversations often revealed that the challenge lay in translating shared understanding into practical changes. Identifying the gap was only one part of the process; organisations still needed to agree who would change the process, how it would change, and how they would know whether those changes improved workers’ experiences.

What we learned

One of the biggest lessons from this pilot was that well-designed systems do not automatically translate into positive worker experiences. Worker engagement was most valuable when it was used alongside supplier management information, allowing us to identify gaps and practical improvements that neither perspective could reveal alone.

How would we apply these learnings in the future

In future, we would structure the engagement more explicitly around three complementary perspectives: what buyers expect, what suppliers put in place, and what workers actually experience.

This would mean systematically testing the connections between the three, including:

- whether workers understand and can access the systems and information suppliers have put in place;
- whether those systems work across different sites, shifts, languages and working arrangements;
- how differences between management and worker perspectives can be explored constructively; and
- how worker insights can inform improvements to supplier policies, processes and service delivery.

Bringing these perspectives together more systematically would help identify gaps between what is expected, what exists on paper and what workers experience in practice, and provide a clearer basis for improvement.

D. When good practice didn't influence procurement decisions

The challenge

One of the questions that emerged during the pilot was how improvements made through supplier engagement become recognised within procurement and commercial decision-making.

Throughout the pilot, suppliers invested time in strengthening worker engagement, reviewing labour practices, and implementing practical improvements. However, we observed that these improvements did not automatically become visible or valued within procurement processes.

In practice, two challenges emerged. Suppliers did not always describe workforce improvements in ways that demonstrated their value to procurement teams, often presenting them as sustainability or worker engagement activities rather than evidence of stronger workforce management or service delivery. At the same time, the teams supporting these improvements, such as sustainability or human rights, were not always involved in procurement decisions, limiting opportunities for that learning to inform supplier selection.

This became particularly apparent during one procurement process, where improvements developed through supplier engagement played little part in the commercial discussion.

What we tried

Because this insight emerged towards the end of the pilot, our focus was on understanding what had prevented these improvements from carrying through into the procurement process and what would need to change in the future.

We looked back at how improvements had been communicated during the tender process and considered how the same evidence could have been made more relevant to commercial decision-making. This meant looking beyond their value as worker engagement or sustainability activities and considering what they demonstrated about workforce management and service delivery.

It also led us to consider how learning held by sustainability teams could feed more systematically into procurement decisions.

This led us to ask: how can improvements developed through worker-centred HRDD become part of how procurement teams assess value, alongside the cost, service and other commercial considerations that shape procurement decisions?

What worked

Because this learning emerged towards the end of the pilot, we had limited opportunity to test a different approach within a live procurement process. However, it gave us a clearer understanding of what would be needed: worker-centred improvements need to become evidence that procurement teams can recognise and use in commercial decision-making.

The experience also reinforced that involving procurement teams in supplier engagement is not always enough on its own. Even where procurement and sustainability teams participated throughout the project, there were not always clear organisational pathways for learning generated through supplier engagement to inform formal procurement decisions. This highlighted the importance of thinking not only about who is involved, but also about how information moved between different parts of an organisation.

What didn't work

From a supplier's perspective, investing in better workplace practices takes time, resources and organisational commitment. Where those efforts are not recognised within procurement or contract management, suppliers had limited opportunity to demonstrate the value of that investment within the commercial relationship.

This exposed a disconnect between responsible practice and commercial incentives. Improvements could benefit workers and day-to-day operations, but if they did not influence how suppliers were selected or evaluated, there was little commercial reinforcement for sustaining that investment over time.

What we learned

One of the biggest lessons from the pilot was that improving supplier practices is only part of the challenge. Sustaining those improvements also depends on whether they become recognised within the commercial relationship between buyers and suppliers.

Worker-centred HRDD therefore should not stop once improvements have been implemented. Procurement and contract management can play an important role in recognising and reinforcing better practice, helping to create incentives for continuous improvement rather than relying on one-off action or goodwill.

How would we apply these learnings in the future

In future, we would prioritise how improvements identified through worker-centred HRDD could be recognised within procurement and contract management, rather than addressing this only once improvements had been made. This would include:

- Working with suppliers to identify how these can be evidenced during procurement and contract reviews.
- Developing practical guidance to help suppliers translate those improvements into evidence relevant to procurement and commercial teams.
- Encouraging businesses to create clearer pathways for learning from supplier engagement to inform procurement and contract management.
- Creating opportunities for procurement, sustainability, human rights and operational teams to agree how responsible supplier practices should be recognised within commercial decision-making.

4.4 Supplier takeaway

Five lessons we'd want every business and supplier to remember

1. Strong supplier engagement starts with understanding how outsourced services actually operate, not just reviewing policies and procedures.
2. Meaningful change starts with practical improvements that respond to worker priorities and create a foundation for wider organisational change.
3. Lasting improvements are more likely when buyers and suppliers are clear about who is best placed to act, and where coordinated action is needed.
4. Worker evidence and supplier management information are strongest when they are used together. One shows how systems are designed and managed; the other how workers experience them in practice.
5. Improving practices is only part of the journey. Those improvements also need pathways into procurement and commercial decision-making if they are to be recognised and sustained over time.

Before beginning supplier engagement, ask:

Responsibility: Which labour risks are within the supplier's control, which are influenced by buyer decisions, and where is coordinated action needed?

Evidence: How will supplier management information and worker evidence be brought together to understand how systems work in practice?

Starting point: What matters most to workers, what improvements are achievable now, and what longer-term capacity needs to be built?

Collaboration: How will buyers, suppliers and workers review progress together?

Recognition: How will improvements be evidenced, communicated and recognised within procurement, contract management and other commercial decision-making?

5. Civil Society Organisations (CSOs)

5.1 Why focus on CSOs?

Worker-centred HRDD depends on businesses understanding how workers experience their jobs, including workers who may have limited opportunities to influence the decisions that shape their working conditions.

CSOs can play an important role in making that possible. They can create trusted ways for workers to participate, bring expertise on labour rights and workplace practices, and help organisations understand what worker experiences reveal about wider systems and decisions. Different CSOs may contribute in different ways: those with long-standing relationships with workers may be able to create forms of engagement that businesses cannot establish alone, while others may focus on interpreting labour risks, facilitating dialogue or supporting accountability by challenging organisations where progress is insufficient.

Understanding what a CSO can contribute, and being clear about its role, is therefore an important part of designing meaningful worker engagement, however, guidance often provides limited detail on what this looks like in practice, particularly in outsourced service supply chains where workers may be geographically dispersed, employed through complex arrangements or have limited influence over organisational decisions.

In this pilot, FLEX acted as an independent partner supporting workers, buyers and suppliers to better understand and respond to worker experiences. This builds on FLEX's previous learning on meaningful worker participation, including the importance of adapting engagement to workers' circumstances and recognising workers as experts by experience (FLEX, 2021b). We were not acting as auditors or representatives of management; nor did we take responsibility for improving working conditions on behalf of buyers or suppliers. Instead, our role was to create opportunities for workers to participate, interpret what their experiences revealed, and help connect that evidence to the organisational and commercial decisions shaping their work.

A central lesson from the pilot was that worker voice is essential, but worker voice alone does not automatically create change. Bringing worker evidence together with an understanding of those wider systems helped us identify not only what workers were experiencing but also where opportunities for change sat.

The pilot therefore gave us an opportunity to explore what meaningful CSO involvement looks like in practice: how CSOs can create trusted worker engagement, work constructively with businesses while maintaining their

independence, help ensure that worker experiences influence organisational understanding, decision-making and action, and support approaches that can continue beyond the period of direct CSO involvement.

What do we mean by “CSO”?

In this report, “CSO” refers to a civil society organisation that works to advance social, labour or human rights, and may engage with workers, businesses or suppliers as part of this work. This can include organisations such as worker organisations, trade unions, migrant rights organisations, labour rights groups, and other organisations with relevant expertise or relationships with workers.

CSOs can play different roles in worker-centred HRDD. Depending on their expertise, relationships and mandate, they may support worker engagement, provide advice on labour rights, facilitate dialogue, interpret worker evidence, or support accountability when concerns are identified.

5.2 What we wanted to understand

We wanted to understand what it takes for CSO involvement to strengthen worker-centred HRDD, particularly in outsourced service supply chains where responsibility for working conditions is often spread across different organisations.

More specifically, we wanted to explore where an independent CSO could add most value, what made that involvement effective, and where its limits lay.

A key question was how CSOs could support and challenge organisations without taking over responsibilities that ultimately sat with them. Responsibility for responding to worker concerns remained with the organisations whose decisions and practices shape working conditions.

5.3 What we learned

The pilot reinforced that the value of CSO involvement lies not only on creating opportunities for workers to speak, but in helping ensure that what workers share can meaningfully influence organisational understanding and action. In practice, this required more than facilitating worker engagement.

We also found that the effectiveness of this role depended on maintaining a careful balance between collaboration and independence. Constructive relationships with businesses and suppliers made it easier to discuss difficult issues and identify practical improvements. At the same time, workers needed confidence that engagement was genuinely independent and that their experiences would not be filtered through organisational priorities.

The pilot also clarified the limits of the CSO role. CSOs can facilitate participation, interpret evidence, challenge assumptions and support organisations to identify practical responses, but they cannot substitute for the internal ownership needed to make and sustain change.

This also raised an important question about sustainability: how worker-centred approaches could continue beyond a specific project or period of direct CSO involvement.

A. Creating trusted worker engagement

The challenge

Worker-centred HRDD depends on workers being willing and able to share their experiences. However, in outsourced service supply chains, workers may have good reasons to be cautious about participating.

Workers may be concerned about:

- whether their identity will be protected.
- whether information they share will reach managers or supervisors.
- whether participation could affect their employment.
- whether concerns they have raised previously were taken seriously; and
- whether engagement will lead to meaningful change.

Our experience going into the pilot was that independence can help create the conditions for worker participation but does not automatically create trust. Workers did not necessarily trust an organisation because it described itself as independent. They wanted to understand who was conducting the engagement, who supported or funded the work, why it was taking place, what would happen with their information, and what they could realistically expect to happen afterwards.

As one worker explained:

“Before I participate, I need to know who the organisation is, who is funding the project and what will happen with the information. There are many scams, so we need to know that this is something serious.”

Workshop participant, Spanish-speaking cleaners, 26 October 2024

Trust therefore began before the first question was asked. The challenge was creating an opportunity for workers to participate but also giving them enough information, choice and confidence to decide whether they wanted to participate in the first place.

What we tried

We approached worker engagement as a process of building the conditions for meaningful participation rather than simply gathering information.

From the beginning, we were clear about our role. We did not present ourselves as representatives of buyers or suppliers, nor as auditors assessing compliance. Instead, we explained that our role was to understand workers' experiences, communicate those experiences accurately and support dialogue about possible improvements.

We put this transparency into practice before engagement began. Workers received clear information about who we were, who had commissioned the work, why the engagement was taking place, how their information would be used, the confidentiality protections in place, and what the process could and could not realistically achieve. Participation was voluntary, and workers had opportunities to ask questions before deciding whether to take part.

We also designed engagement around workers' circumstances rather than organisational convenience. This meant the format, timing, and location of engagement, considering language and accessibility needs, and recognising that caring responsibilities, working patterns and different levels of confidence could all affect someone's ability to participate.

We also offered different ways to take part. Some workers felt comfortable speaking in groups, while others preferred to raise concerns privately or were more concerned about being identified. Rather than expecting workers to adapt to a single engagement format, we tried to create multiple routes through which they could participate safely and meaningfully.

What worked

Maintaining a clearly independent position helped create the conditions for more open and honest worker engagement. Workers were often willing to discuss issues that had not previously emerged through existing organisational processes, particularly where they understood that participation was voluntary and that their identities would be protected.

As trust developed, the conversations also became richer. Workers moved beyond individual concerns to discuss patterns across their workplaces, including management practices, communication, workload and the wider factors shaping their working conditions. This helped us understand not only individual experiences, but what those experiences revealed about how workplace systems were operating in practice- some of which may not have been visible through existing HRDD processes.

Transparency throughout the process also mattered. Workers wanted to know what would happen with the information they shared, and whether their participation would lead to meaningful follow-up. Keeping workers informed helped reinforce that engagement had a purpose beyond collecting their experiences.

What didn't work

Some tensions remained even with careful engagement design. One of the most difficult was balancing confidentiality with the need for organisations to have enough information to act on what workers raised.

Workers needed confidence that sharing their experiences would not expose them to negative consequences. At the same time, the more specific a concern became the greater the risk that details about a role, shift, site, or experience could make an individual identifiable. This was particularly challenging in smaller workplaces or teams.

As a result, we could not always share worker evidence in the level of detail that businesses or suppliers might have found useful for investigating individual concerns. Protecting workers sometimes meant sharing patterns or themes rather than individual experiences.

We also learned that independence and confidentiality were not enough to sustain trust if workers could not see what happened after engagement. Even where confidentiality was protected and concerns were taken seriously, long gaps in communication or limited visible follow-up risked reinforcing workers' previous experiences of participating in consultations, surveys or grievance processes without seeing meaningful change afterwards.

What we learned

The pilot reinforced that trust is not an inherent feature of an organisation, it is something built through the worker engagement process. Being independent helped create the conditions for workers to participate openly, but workers ultimately judged the process through their experience of it. We found these decisions mattered: how clearly the purpose of engagement was explained whether workers had genuine choices about participation, how confidentiality was handled, and what happened after concerns were raised. Together, these shaped whether workers felt safe and if engagement was worth their time.

For CSOs, this means treating trust as something that must be built and maintained throughout the process, not as a prerequisite for worker engagement.

How would we apply these learnings in the future

The pilot confirmed the value of the trust-building safeguards already built into our methodology, while showing that some needed to happen earlier, be applied more consistently, or be made more explicit throughout the process. In future engagements, we would build on this by:

- providing information about the CSO, its role, who commissioned the work, and its relationships with the organisations involved as early as possible;
- involve trusted local organisations or worker representatives earlier where their relationships could help workers understand and feel confident in the process;

- strengthening the range of participation routes available, recognising that workers may have different levels of confidence and face different risks;
- agreeing a clearer arrangement for ongoing communication and feedback, so workers know what is happening after they participate;
- further formalising processes for identifying, escalating and responding to potential retaliation concerns; and
- continuing to design participation around workers' circumstances, ensuring that unpaid time, accessibility barriers or language exclusion do not prevent workers from taking part.

B. Maintaining relationships without compromising independence

The challenge

Worker-centred HRDD requires relationships with businesses to create opportunities for change. Without access to suppliers, buyers and decision-makers, CSOs may struggle to understand operational realities, influence business practices or support improvements.

However, working closely with organisations also creates tensions that need to be actively managed. The closer a CSO works with businesses, the greater the possibility that its role becomes unclear. Organisations may begin to see the CSO primarily as a partner supporting their objectives rather than as an independent organisation bringing worker perspectives into decision-making.

There can also be more subtle pressures. Maintaining constructive relationships may make difficult conversations harder, particularly where progress is slow or where the changes workers need conflict with organisational or commercial priorities.

The challenge is therefore not whether CSOs should collaborate with businesses or maintain distance from them. Worker-centred HRDD requires engagement. The question we explored through the pilot was how to build the relationships needed to understand and influence organisational practice while retaining the independence to challenge it.

For FLEX, the challenge was maintaining relationships that created space for worker evidence to influence decisions, while remaining able to challenge organisations when that evidence showed further action was needed.

What we tried

Rather than treating collaboration and independence as competing choices, we approached them as something that needed to be actively managed throughout the relationship. Worker evidence remained the anchor for these conversations, helping us maintain a clear purpose even as relationships with organisations developed over time.

We also maintained clear boundaries around our role. We did not represent management interests, approve or certify organisational practices, or take responsibility for decisions that remained with businesses. Nor did we treat a commitment to participating in the pilot as evidence that concerns would be addressed.

Our role was to bring worker evidence into organisational discussions, contribute our expertise on outsourced service systems, structural vulnerabilities and the risks facing low-paid and migrant workers, support dialogue between different stakeholders, help identify what was preventing change, and highlight where further action was needed. This required us to understand the realities organisations were working within without allowing operational constraints to become explanations for inaction. At times, that meant supporting organisations to identify realistic ways forward. At others, it meant challenging assumptions or being clear that further action was needed.

The aim was to build a relationship that would create space for honest discussion and practical change, while keeping worker experiences at the centre of the process.

What worked

Maintaining relationships over time created a deeper understanding of what was enabling or preventing change within organisations.

Some barriers reflected limited knowledge, capacity or uncertainty about how to respond to worker evidence. Others were linked to wider structural issues, including procurement practices, commercial pressures, buyer-supplier relationships and internal decision-making processes. Staying engaged helped us distinguish between these different barriers and develop recommendations that were both grounded in worker experiences and realistic about where and how change could happen. It also helped us identify who needed to be involved for those changes to move forward.

Ongoing relationships also meant that worker evidence could remain part of organisational discussions over time, rather than becoming a one-off input. As new questions or barriers emerged, we could return to the evidence, clarify misunderstandings, and continue challenging assumptions about what workers were experiencing and why.

This reinforced that maintaining independence did not weaken relationships, it made them more credible.

As one worker put it:

“We hope the research makes the employers listen to workers and that they can make the workplace a comfortable space where we can be happy.”

Workshop participant, Spanish-speaking cleaners, 28 September 2024

What didn't work

Constructive engagement did not always translate into meaningful change. Organisations could participate openly, maintain good relationships and show willingness to discuss worker concerns, while progress on some of the underlying issues remained limited.

This made it important not to confuse the quality of the relationship with the impact of the engagement. Continued meetings, positive dialogue and access to decision-makers were valuable, but they were not in themselves evidence that workers' experiences were leading to concrete change.

There were also points where progress was slow because the issues were genuinely difficult to resolve, particularly where they involved multiple teams, suppliers or commercial decisions. The challenge was distinguishing these situations from those where continued dialogue was simply not leading to sufficient action.

We were conscious that close collaboration between CSOs, and businesses could ultimately benefit organisations more than workers. This was an important reminder that the credibility of the relationship also depended on workers understanding our role and seeing that their interests remained central to the engagement. The limit of relationship-based engagement was not disagreement. It was the point at which continued dialogue stopped creating meaningful opportunities for progress.

What we learned

The pilot reinforced that collaboration and independence are not opposing choices. A CSO can work closely and constructively with businesses while remaining independent, provided it retains the ability to interpret evidence critically, challenge decisions and be clear where further action is needed.

In fact, sustained relationships can strengthen that independent role. Understanding how organisations operate, where decisions sit and what barriers they face can make challenge more informed and recommendations more practical. The important distinction is between understanding organisational constraints and allowing those constraints to determine what is considered possible or acceptable.

We also learned that independence needs to be actively maintained throughout a relationship. Sometimes collaboration may be the most effective route to change, and, at other points, stronger challenge may be needed or, in some circumstances, stepping back may be the most responsible action.

For us, independence was less about maintaining distance from organisations and more about retaining an independent perspective within constructive relationships. This meant understanding organisational realities while continuing to centre worker evidence, question assumptions and identify where further action was needed.

How would we apply these learnings in the future

Looking back, we would build clearer review points into longer-term engagements to assess how the relationship was working and whether it was continuing to create meaningful opportunities for change.

At different stages, we would ask:

- Is worker evidence continuing to influence organisational discussions and decisions?
- Is the engagement contributing to improvements for workers?
- Where progress is slow, what is preventing change?
- Do we need to continue supporting dialogue, challenge more directly, or escalate certain concerns?
- Is our involvement still adding value or would a different approach be more effective?

We would also document barriers and areas of limited progress as carefully as successes, helping distinguish between changes that genuinely require more time and situations where engagement is not leading to sufficient action.

Where progress remained limited, we would build in clearer routes for escalation and be more explicit about the circumstances in which the approach might need to change. For example, this might mean involving different decision-makers, shifting from support to stronger challenge, or, in some circumstances, reconsidering if engagement remained the most effective use of our role.

The purpose of partnership is not to avoid disagreement. It is to create enough trust and openness for difficult issues to be discussed honestly, while remaining clear about when discussion needs to lead to action.



C. Turning worker voice into organisational accountability

The challenge

Worker-centred HRDD is not meaningful simply because workers have been consulted, or because their evidence has reached the relevant decision-makers. Accountability also depends on what happens next: how organisations consider that evidence, what they decide to do in response, and whether that response can be traced and communicated back to workers.

The question we explored through the pilot was therefore not only whether worker evidence reached an organisation, but what happened to it once it did. Sharing findings was relatively straightforward, ensuring those findings remained visible as organisations considered priorities, possible responses and operational constraints was more complex.

There was a risk that worker engagement could become a reporting exercise: workers share their experiences, findings are documented, but there is no clear pathway between what workers have raised and the decisions that follow.

Workers highlighted this concern themselves. Many recognised the potential benefits of engagement with businesses but did not want their participation simply to demonstrate that consultation had taken place. They wanted to know that sharing their experiences could contribute to meaningful improvements. The challenge was therefore to create a clearer connection between worker evidence and organisational response: who considered the evidence, what decisions followed, and how those decisions could be made visible.

What we tried

Rather than treating accountability as something that happened only after engagement through final reporting, we tried to create a clearer pathway from what workers raised, to our recommendations, to how organisations responded to them.

We kept worker evidence separate from organisational assessment and decision-making, while using our prioritisation and recommendations to translate that evidence into areas for action. Organisations could then consider what action was appropriate, what they could take forward and what barriers remained.

We also encouraged organisations to make their response to recommendations more explicit, including which issues they would prioritise and, where recommendations could not be implemented, and why.

Throughout this process, our role was to keep worker evidence visible and test whether proposed responses addressed the issues workers had raised, rather than making decisions on organisations' behalf.

What worked

Worker evidence provided a consistent reference point throughout implementation, allowing proposed responses to be tested against the experiences and priorities workers had raised.

Rather than relying only on organisational assumptions about what workers needed, discussions could return to workers' experiences to test whether proposed responses addressed the issues they had identified. This was particularly important in outsourced service supply chains, where workers often have limited direct communication with clients or decision-makers. Worker evidence helped bridge that distance, connecting day-to-day realities with the organisations whose decisions could influence them.

Keeping worker evidence, organisational interpretation and response distinct also made it easier to see where progress was being made and where gaps remained. Organisations did not need to agree with every recommendation, but there was a clearer record of what workers had raised, how the organisation understood the issue and what it had decided to do in response.

This made the relationship between worker engagement and subsequent action more traceable, rather than allowing worker evidence to become a one-off input at the beginning of the process.

What didn't work

Keeping worker evidence connected to decision-making was not always straightforward. Issues that could be addressed relatively quickly could gain more traction, while more systemic concerns were harder to carry through into action because they involved wider organisational structures, procurement practices or commercial relationships.

Closing the loop with workers was another challenge. Workers had shared their time and experiences, but organisational decision-making could take place over much longer periods. This made it difficult to provide timely updates about what had happened as a result of their participation, particularly where decisions were still ongoing or depended on several stakeholders.

We also found that individual concerns could sometimes be treated as isolated cases rather than evidence of wider patterns. Issues raised by individual workers often reflected broader organisational or structural problems. Responding effectively therefore required identifying which individual concerns could provide insight into wider issues, and what they revealed about the systems and decisions shaping workers' experiences.

What we learned

The pilot reinforced that accountability is not created by worker engagement alone. What matters is whether organisations can demonstrate how they have responded to what workers raised.

This shifted our understanding of accountability from whether organisations

had listened to whether they could show what happened next. A response did not necessarily mean accepting every recommendation, but it did mean considering the evidence, making a decision and being transparent about what followed.

For workers, that connection between participation and what happens afterwards matters too. As one worker put it:

“If the employer sees the research outcomes and pulls the plug on the research, workers will feel abandoned.”

Workshop participant, Spanish-speaking cleaners, 22 November 2025

How would we apply these learnings in the future

In future, we would make the pathway from organisational consideration to response more explicit and traceable.

This would include:

- creating clearer mechanisms for organisations to record how they respond to worker evidence and recommendations;
- documenting decisions to accept, modify or not take forward recommendations, including the reasons why;
- creating opportunities for workers to comment on whether proposed responses address the issues they originally raised;
- planning from the outset how workers will be updated on what happens after they participate, including where change takes time or recommendations cannot be implemented; and
- tracking what happens after worker evidence has been considered, what was decided, what action followed and where barriers remained.

D. Making change last beyond the pilot

The challenge

A key question for CSOs involved in worker-centred HRDD is what happens when the period of direct CSO involvement comes to an end.

Pilot projects can demonstrate the value of worker participation, generate new insights into workplace realities and create opportunities for dialogue between workers, suppliers and buyers. But lasting change depends on whether the organisations involved can carry that learning into their own decisions and practices once the pilot structure is no longer there.

This creates an important tension. The aim is not to make worker-centred HRDD permanently dependent on a CSO, but neither is it to assume that organisations can simply absorb all the functions an independent CSO has

played. Trusted worker engagement, independent analysis and challenge may continue to require external expertise or relationships.

The question we explored through the pilot was what could and should become embedded within organisational practice, and where continued independent involvement might still add value.

What we tried

Throughout the pilot, we looked for ways to move learning from individual engagement activities into the organisations and relationships involved, rather than allowing it to remain tied to the pilot itself.

This meant working with buyers and suppliers not only to respond to the issues workers raised, but to understand what those issues revealed about their existing systems and practices, and what they might need to change to identify and respond to similar issues in the future.

Where possible, we encouraged organisations to adapt their own processes in response to the learning generated through worker engagement. This included strengthening communication with workers, reviewing existing policies and procedures, and considering how worker evidence could inform ongoing supplier management and HRDD processes. In one case, this extended to the buyer incorporating participation in a collaborative worker engagement and social sustainability programme into its supplier relationship, providing a structured way to continue worker engagement and identify opportunities for improvement during the contract.

We also tried to build understanding across the different teams and organisations involved, so that knowledge about worker experiences did not sit only with the individuals participating directly in the pilot. This was particularly important where responsibility for responding to issues was spread across buyers, suppliers and different internal functions.

At the same time, we distinguished between practices organisations could increasingly own and functions where continued independence could add value, particularly worker engagement and specialist labour rights expertise.

What worked

Some of the strongest signs of longer-term change came when learning from worker engagement began to influence organisations' own practices, rather than remaining tied to individual pilot activities.

Following the pilot, one buying company began applying learning from the project to how it procured and managed outsourced services. Worker experiences contributed to greater consideration of working conditions, health and safety, worker communication and facilities when selecting cleaning providers and assessing tenders, alongside more traditional commercial considerations. This showed how learning from worker engagement could begin to influence the company's own procurement processes, rather than remaining tied to the pilot.

The learning was also applied beyond the original UK cleaning context. The company began reviewing outsourced cleaning practices in other countries, and applying learning from the pilot to other outsourced services. This suggested that the approach was beginning to inform the company's wider thinking about outsourced work, rather than remaining a response to issues identified through a single pilot.

We also saw value when the learning reached beyond the individuals directly involved in the pilot. Bringing different teams, buyers and suppliers into discussions helped build a broader understanding of how working conditions were shaped and where responsibility for improvement sat.

As one participant reflected:

“If we build relationships with the researcher, then the opportunities are limitless. If the research is a drive by, nobody knows what happened with the project or how the research is used.”

Workshop participant, Spanish-speaking cleaners, 22 November 2025

What didn't work

Not everything developed through the pilot was easily sustained without continued external support. Where responsibility for continuing an activity, following up on worker evidence or maintaining engagement had not been clearly embedded within an organisation, progress could remain dependent on individual relationships or FLEX's coordination.

We also found that some of the changes needed to sustain worker-centred approaches sat across different teams or organisations. A supplier might be able to strengthen its own communication or HR processes, for example, while wider issues linked to procurement, contracting or buyer decisions required action elsewhere. This made it difficult for an organisation to carry the approach forward alone.

What we learned

The pilot reinforced that sustainability depends on clearer organisational ownership of the parts of worker-centred HRDD that businesses and suppliers can carry forward themselves. Embedding the ability to identify and respond to worker concerns, strengthen internal systems and use worker evidence in decision-making is more important than preserving the structures or activities of a time-limited pilot.

At the same time, sustainability does not mean internalising every function previously performed by a CSO. Independent worker engagement, labour rights expertise and constructive challenge may continue to serve a distinct purpose. The task is therefore to be clearer about what organisations should own, what requires coordination across buyers and suppliers, and where continued independent involvement adds value.

How would we apply these learnings in the future

Throughout the pilot, we considered how learning and improvements could continue beyond FLEX's direct involvement. Our experience showed that this transition could be made more explicit and structured.

In future engagements, we would:

- identify early which elements organisations should carry forward, who will own them and what support may be needed;
- establish clearer transition points, including when activities should move from CSO-supported to organisation-led;
- consider how learning and new ways of working can be embedded into existing organisational processes, rather than relying on particular individuals involved in the engagement;
- clarify where responsibility for sustaining improvements sits across buyers, suppliers and different internal teams, particularly where action depends on more than one organisation;
- agree how progress will continue to be reviewed as direct CSO involvement reduces; and
- identify where continued independent involvement remains valuable and the specific purpose it should serve.



5.4 CSO takeaway

Five lessons for civil society organisations supporting worker-centred HRDD

1. Trust is built through how engagement is designed and delivered

Independence can help create the conditions for worker participation, but it does not automatically create trust. Workers need clear information about who is involved, why engagement is taking place, how their information will be used and what they can realistically expect from participating.

Trust depends on transparent communication, appropriate safeguards and engagement designed around workers' circumstances, choices and different levels of risk.

2. Independence is maintained through purpose, not distance

Working closely with businesses does not necessarily compromise a CSO's independence. Constructive relationships can create important opportunities to understand organisational realities, influence decisions and support change.

What matters is that the relationship remains a means of improving outcomes for workers rather than an end in itself. This requires keeping worker evidence and interests at the centre, maintaining clear boundaries and retaining the ability to question assumptions and challenge organisations where further action is needed.

3. Accountability depends on creating a visible route from worker evidence to organisational response

Worker engagement can generate valuable evidence without necessarily influencing what happens next. CSOs can help create a clearer connection between what workers raise and how organisations consider and respond to that evidence.

Accountability does not require organisations to accept every recommendation, but it does require a traceable response: what was considered, what was decided, what action followed and, where action was not taken, why.

4. Sustainability requires ownership, while recognising the continuing value of independent involvement

When a CSO steps back, the aim should be for organisations to carry forward the responsibilities and ways of working that properly sit with them, rather than becoming permanently dependent on CSO involvement.

This means embedding learning into organisational processes, clarifying ownership and building capacity to respond to worker concerns. But sustainability does not require every function to be internalised. Independent worker engagement, specialist expertise or challenge may continue to add value where they serve a clear purpose.

5. CSOs should be clear about what their role is — and where it ends

CSOs can create trusted opportunities for workers to participate, bring independent evidence into organisational processes, provide expertise, challenge assumptions and decisions, and support organisations to identify possible responses.

Responsibility for acting on worker evidence must remain with the organisations that have the power to make change. CSO involvement should strengthen that responsibility, not replace it. Being clear about this boundary helps avoid creating a process in which the CSO becomes responsible for driving improvements that ultimately depend on buyer or supplier decisions.

Before beginning worker-centred HRDD, CSOs should ask:

Trust: How will workers understand who is involved, why the engagement is taking place, how their information will be used and what they can realistically expect from participating?

Independence: Is the CSO's role clear to workers, suppliers and buyers? How will the CSO maintain its independence and ability to challenge while working constructively with the organisations involved?

Accountability: What is the route from worker evidence to organisational response? How will responses be recorded, followed up and communicated back to workers?

Ownership: What should organisations be able to carry forward as CSO involvement reduces? Who owns these responsibilities, and where might continued independent involvement still add value?

Responsibility: What is the CSO here to do, and what remains the responsibility of buyers and suppliers? When should the CSO support, challenge, escalate, step back or adapt its approach?

6. Looking ahead

This pilot has shown that worker-centred human rights due diligence can be practical, meaningful and relevant to outsourced service supply chains. By working directly with workers and bringing businesses and suppliers into the process, we have been able to test what it takes to move beyond policies and commitments towards approaches that respond to workers' experiences and priorities.

The learning from the pilot has highlighted that there is no single intervention that will address the risks workers face in outsourced work. Meaningful change requires action at different points in the supply chain, and stronger collaboration between workers, CSOs, suppliers and businesses. It also requires businesses to recognise that responsibility for working conditions does not end with outsourcing.

There is more to do. The next stage of this work will focus on strengthening and applying the tools and approaches developed through the pilot, supporting businesses to put worker-centred HRDD into practice, and continuing to build the evidence base as well as practical standards for responsible outsourcing. We will also continue to work with workers and their representatives to ensure that their experiences and priorities shape how these approaches develop.

The experience of this pilot reinforces the principle that workers should be at the centre of efforts to identify, prevent and address labour rights risks in outsourced supply chains. Giving workers a seat at the table is possible, but that is only the beginning. What matters is what happens next: whether the organisations around the table are willing and able to listen, act on what workers share, and make changes that improve working conditions.

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