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Information Note
on Human Rights
Due Diligence for
the Textile and
Apparel Sector



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▶ Introduction

This information note has been prepared as part of the Project on Strengthening Institutional Capacity for Human Rights Due Diligence in the Supply/Value Chain of the Textile and Apparel Sector in Diyarbakır Province, implemented by the Development Workshop Cooperative in cooperation with the Diyarbakır Chamber of Commerce and Industry (DTSO). The project was carried out under the Project on Strengthening the Capacities of Social Partners and Civil Society Organizations on Fundamental Principles and Rights at Work, implemented by the ILO Office for Türkiye.

The main aim of this study is not to present human rights due diligence as a comprehensive and technical compliance system for businesses operating in the textile and apparel sector; but rather, it seeks to make the core approach in this field more understandable and accessible by relating it to the realities of the sector. This information note is not intended to impose new or burdensome obligations on companies. Instead, it aims to raise awareness of where and how human rights risks may arise and to help businesses better understand the connection between these risks and their own operations.

In Diyarbakır, the sector is largely order-driven, with widespread subcontracting relationships and intense competitive pressure. In such a context, human rights risks often arise not as isolated incidents, but as part of routine business practices. When they are not identified and addressed in a timely manner, they can turn into complex management challenges. Human rights due diligence offers a framework for recognising these risks early and addressing them proactively, rather than reacting only after problems have deepened.

Grounded in the realities of small and medium-sized enterprises, this note favours gradual progress over comprehensive compliance, and practical guidance over the expectation of perfection. The goal is to give businesses a clear sense of where to start, and to help them engage with human rights due diligence not as an abstract concept, but as something that can be meaningfully connected to everyday decision-making and management.

The content prepared within this framework not only creates a shared basis of awareness for businesses operating in the textile and apparel sector in Diyarbakır, but also addresses sector actors of different sizes and across different regions, while supporting the integration of a rights-respecting approach to doing business into institutional capacity-building processes.

▶ 1

Changing Production Patterns and Competitive Conditions in the Textile Sector

Why Human Rights Matter?

The sector is labour-intensive, highly networked, and driven by fast production cycles, making it particularly sensitive to economic fluctuations and shifts in global market conditions. In recent years, these pressures have become even more pronounced. Rising production costs, the relocation of production to lower-cost countries, and increasingly complex supply chains have made production processes both more intensive and more fragile. As a result, the sector now operates in an environment that is not only more economically volatile but also more sensitive regarding working conditions and human rights.

This transformation has also changed the nature of competition in the sector. Competition is no longer shaped by price alone. Delivery times, production flexibility, quality, and supply chain manageability have become equally important. Shorter lead times and sudden changes in orders increase time pressure throughout production, and that pressure has direct consequences for labour relations and the organisation of work.

At the same time, power imbalances between buyers and suppliers within global supply chains have become more visible. Prices, delivery conditions, and contractual terms set by large buyers place considerable pressure on manufacturers, particularly small and medium-sized enterprises. In this structure, much of the cost and time pressure is pushed downward to the production stage, and human rights risks often become concentrated at precisely this point.

These developments affect not only costs and productivity for businesses operating in the textile and apparel sector, but also expectations regarding working conditions and human rights. In recent years, human rights due diligence standards have gained greater weight in international markets and are no longer simply a matter of ethical concern. They have become an increasingly important factor in competitiveness, market access, and long-term sustainability. Access to the European Union market, in particular, increasingly requires companies, in practice, to anticipate and address human rights risks not only in their own operations but also throughout their supply chains.

In this context, human rights due diligence is emerging not as a voluntary gesture of goodwill, but as a key tool for adapting to changing production and competitive conditions in the textile and apparel sector.

▶ 2

Human Rights Risks in the Textile Sector

Main Risk Areas and Vulnerable Groups

Human rights risks in the textile sector can arise at different stages of the production process and across different actors. The involvement of multiple actors in production, combined with time pressure and cost-driven competition, creates a range of risk areas that require close attention from a human rights perspective. These risk areas include the following:

▶ Working Hours and Wage Practices

Because production in the textile sector is largely driven by orders and delivery deadlines, significant risks can arise regarding working hours and wage practices. Particularly during peak production periods, practices such as long working hours, the failure to record overtime in a regular and transparent manner, and wages that do not fully reflect actual working time may be observed. This increases the risk of undermining workers' rights to rest, their overtime rights, and the principle of fair pay.

Most formally employed workers in the textile sector earn the legal minimum wage. At the same time, particularly in cases involving informal and insecure employment relationships, workers may be paid below the minimum wage. Even where the minimum wage is paid, it is widely understood that this level of pay is often insufficient to meet the basic living needs of workers and their families, and that a widespread livelihood gap persists.

▶ Informal Employment and Precarious Work

The structure and organisation of production in the textile sector can create conditions for different forms of informal employment, including the absence of social security registration, the partial payment of wages in cash, or the failure to reflect actual working hours in official records.

Such practices are more commonly encountered in small-scale, workshop-type enterprises, particularly those with limited capacity, short-term and irregular employment relationships, more intense cost pressures, and little or no effective oversight.

Informal employment weakens workers' access to healthcare, pension entitlements, and protection in the event of workplace accidents. It can also intersect with other human rights risks, giving rise to more complex and less visible problems. These practices often have more severe consequences for vulnerable groups.

► Occupational Health and Safety Conditions

Textile production poses a range of occupational health and safety risks due to the machinery, chemicals, and working environments. Inadequate ventilation, non-ergonomic working arrangements, shortcomings in fire and electrical safety, and limited use of personal protective equipment are among the most common problem areas in the sector. These risks can have serious consequences in terms of both workplace accidents and occupational diseases.

In addition to these risks, insufficient information and low awareness among workers regarding occupational health and safety are also significant concerns. When workers lack adequate knowledge of the risks they may face, safe working methods, or the procedures to follow in emergencies, the impact of existing hazards can be further intensified.

► Child Labour

Child labour in the textile sector is a serious human rights risk, particularly in small-scale and workshop-type production settings where oversight is limited and informal working arrangements are more widespread. The risk of child labour often emerges alongside factors such as economic vulnerability, insufficient household income, and barriers to education. This can result in children dropping out of school, harming their physical and psychological development, and contributing to the long-term continuation of cycles of poverty.

The emergence of these core human rights risks in the textile sector is also shaped by a number of structural factors that make such risks harder to detect, address, and prevent. One of the most significant of these is the limited scope of trade union rights and opportunities for worker organisation. In environments where workers lack strong mechanisms to raise their voices collectively, problems related to working conditions become less visible and avenues for redress become more limited.

Another important factor is the limited visibility and traceability of human rights risks. This is particularly the case in production structures that are fragmented and characterised by widespread subcontracting and supplier relationships. In such settings, it can be difficult to identify where and how risks arise within the production process. This may blur lines of responsibility and allow risks to be dispersed across different actors.

In addition, the absence of effective grievance and complaint mechanisms, or their failure to function properly, makes it harder to identify human rights risks at an early stage. Where complaint channels do not exist or are not trusted, problems are more likely to remain hidden and deepen over time.

Although human rights risks in the textile sector can affect all workers, they may have more severe and lasting consequences for certain groups. Because of their position within employment relationships and the limited resources available to them, these groups are often more vulnerable.

Women, young workers, migrant and refugee workers, and workers in informal employment often face greater barriers to accessing remedy and redress mechanisms because of factors such as language barriers, limited access to information, legal uncertainty, and economic dependence. In environments where trade union organisation is weak, complaint channels are limited, and oversight is inadequate, these groups become even more exposed to human rights risks.

For this reason, when addressing human rights risks in the textile sector, it is also important to consider who is most affected by these risks and which groups are more likely to bear their consequences disproportionately.

▶ 3

Human Rights Due Diligence

Expectations for the Textile Sector

Human rights due diligence refers to a company's responsibility not only to identify human rights risks arising from its own operations, but also to recognise risks that may emerge throughout its production relationships and supply chain, to take reasonable steps to prevent or mitigate those risks, and to monitor and improve those actions where necessary.

While companies contribute to economic and social development by creating employment, they may also, through their own operations or through practices occurring across their supply chains, cause or contribute to adverse human rights impacts affecting workers and communities. Due diligence seeks to minimise such impacts.

Due diligence is not a one-off checking exercise or a matter of preparing documents. On the contrary, it is an ongoing process. What is expected of businesses is not that they solve every problem perfectly, but that they understand the risks, prioritise among them, and take concrete, consistent steps within their means.

In this sense, due diligence is:

- ▶ not a certification programme,
- ▶ not a type of audit,
- ▶ and not an obligation that applies only to large enterprises.

Rather, due diligence defines a sphere of responsibility that varies according to the size of the business, its area of activity, and the nature of its production relationships.

In the textile and apparel sector, human rights risks are often linked less to isolated violations than to the way production is organised. Order-based production, short lead times, and multi-layered production structures create constant pressure on work organisation, working hours, and wage practices. For this reason, respect for human rights cannot be addressed solely through monitoring practices within the enterprise; sub-contracting arrangements, supplier relationships, and production planning decisions that shape production processes must also be part of this assessment. In this context, businesses operating in the textile sector are expected to adopt an approach that includes the following:

- ▶ **Acknowledging the existence of risks**

Businesses operating in the textile sector are expected to recognise that, given the sector's structural characteristics, their operations may involve human rights risks.

These risks should be understood not as exceptional situations but as foreseeable consequences of the way business is conducted.

▶ **Not limiting responsibility to their own operations**

Due diligence approach requires businesses in the textile sector not only to focus on practices within their own facilities, but also to consider the broader area of impact shaped by their operations, including production relationships, subcontracting arrangements, and supplier relationships.

▶ **Adopting a proactive approach**

Textile businesses are expected to develop an approach that anticipates potential adverse impacts in advance and seeks to prevent or mitigate them, rather than responding only after problems have emerged.

▶ **Viewing due diligence as a process**

Human rights due diligence is not a one-off compliance exercise or a document-based process. Businesses are expected to treat it as an ongoing management process that is continuously developed and strengthened over time.

▶ **Applying proportionality and realism**

Due diligence should be applied in a way that reflects the size, capacity and resources of the business. Businesses in the textile sector are not expected to address every issue at the same time. Instead, they should set priorities in light of their own circumstances and act in a reasonable and consistent manner.

▶ **Giving importance to transparency and communication**

Textile businesses are expected to communicate openly and honestly on human rights-related issues with workers and stakeholders with whom they have business relationships, and to make the challenges they face visible rather than conceal them.

These expectations are not intended to require businesses operating in the textile sector to develop flawless practices. Rather, they are meant to encourage the adoption of an approach that is conscious of human rights risks, consistent in its application, and grounded in a clear sense of responsibility. A due diligence approach can help businesses create a more protective environment for workers and other actors involved in production relationships, while also providing a basis for greater resilience and sustainability in the face of changing global expectations.

▶ 4

International Standards and Social Compliance

Foundations of Human Rights Due Diligence

Human rights due diligence is not an abstract or purely voluntary approach for businesses. Rather, it is the reflection of internationally recognised minimum human rights standards in business practices. These standards do not merely define the areas in which businesses bear responsibility; they also establish the rights that should form the basis of due diligence processes.

The main reference point for human rights in working life is the Fundamental Principles and Rights at Work (FPRW) framework developed by the International Labour Organization (ILO). The FPRW framework defines the minimum rights that must be protected in the world of work. These rights are fundamental standards that must be upheld regardless of the type of employment relationship, the structure of the sector, or the level of development of a country. Through its Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and expanded in scope in 2022, the ILO has established this framework as a common global reference point. The FPRW framework consists of five core principles and ten fundamental ILO Conventions that give concrete expression to these principles:

Fundamental Principle	ILO Convention	Year of Adoption	Year of Ratification by Türkiye
Freedom of association and the effective recognition of the right to collective bargaining	No. 87 – Freedom of Association and Protection of the Right to Organise	1948	1993
	No. 98 – Right to Organise and Collective Bargaining	1949	1952
The elimination of all forms of forced or compulsory labour	No. 29 – Forced Labour Convention	1930	1998
	No. 105 – Abolition of Forced Labour Convention	1957	1961
The effective abolition of child labour	No. 138 – Minimum Age Convention	1973	1998
	No. 182 – Worst Forms of Child Labour Convention	1999	2001
The elimination of discrimination in respect of employment and occupation	No. 100 – Equal Remuneration Convention	1951	1967
	No. 111 – Discrimination (Employment and Occupation)	1958	1967
A safe and healthy working environment	No. 155 – Occupational Safety and Health Convention	1981	2004
	No. 187 – Promotional Framework for Occupational Safety and Health Convention	2006	2014

Türkiye is among the countries that have ratified all ten of the fundamental ILO Conventions included in this framework. This means that, for Türkiye, the FPRW framework is not only an international expectation but also a formal and binding commitment. For the state, this commitment entails obligations relating to legal alignment, effective enforcement, and the prevention and remediation of violations. For businesses, the FPRW framework provides a point of reference that goes beyond compliance with national legislation and is gaining increasing importance in international supply chains.

At the national level, the core principles relating to the protection of rights at work and human rights in Türkiye are safeguarded not only by the Constitution, but also by labour law, social security legislation, and related secondary regulations. Together, these legal instruments define the basic obligations of businesses in areas such as the right to work, fair wages, safe and healthy working conditions, non-discrimination, freedom of association, and the protection of children.

The FPRW framework provides the starting point for defining the rights around which due diligence processes should be built. The question of how these rights should be respected in business operations is addressed by international standards developed specifically for the business community, which define the relationship between business and human rights and clarify the scope of corporate responsibility. The main standards in this area are:

- ▶ United Nations Guiding Principles on Business and Human Rights
- ▶ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ▶ ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

Although these three standards were developed by different institutions, the core message they convey to the business community is largely the same: businesses cannot limit themselves to simply avoiding human rights violations. They are also responsible for identifying, preventing and, where necessary, addressing the adverse human rights impacts that may arise through their own operations and business relationships.

In addition to these international instruments, Türkiye published the National Guidelines Regarding Working Life in 2022, taking into account the United Nations Guiding Principles on Business and Human Rights. These principles are built around the following 11 core commitments:

- ▶ The obligation to respect human rights in employment relationships is based on internationally recognised human rights.
- ▶ Discrimination in working life is prohibited.
- ▶ Forced labour is prohibited.
- ▶ The State and the social partners shall take and implement the necessary measures to eliminate child labour.
- ▶ Appropriate preventive and corrective measures shall be taken to prevent discrimination and human rights violations in employment relationships.

- ▶ Employers are obliged to take the necessary measures to prevent discriminatory practices in employment relationships.
- ▶ Employers shall establish and implement appropriate internal policies to ensure that the right to work can be exercised in a safe manner.
- ▶ Regulations introduced by the State concerning collective bargaining and freedom of association must be implemented by employers.
- ▶ Employers are obliged, within the framework of the legislation, to remedy the adverse consequences of discriminatory practices and failures to fulfil occupational health and safety obligations, and to cooperate in this regard.
- ▶ Current obligations relating to green growth and decent work should be taken into account in working life.
- ▶ In order to prevent discrimination and human rights violations in employment relationships, the State shall establish the necessary guidance and complaint mechanisms and encourage their development.

Responsibilities that have long been articulated in international frameworks are increasingly becoming the subject of binding regulation. In particular, the European Union Corporate Sustainability Due Diligence Directive, Germany's Act on Corporate Due Diligence Obligations in Supply Chains, and similar national regulations are making human rights due diligence a binding requirement for businesses. Rather than creating new rights, these regulations elevate principles and responsibilities that have long been recognised in international standards to the level of legal obligation. In doing so, they move due diligence beyond the realm of ethical expectation and make it an integral part of doing business.

These international standards are also becoming a prerequisite for access to global markets for textile and apparel businesses operating in Türkiye. For companies producing for the European Union market in particular, human rights due diligence is increasingly becoming a responsibility required both by the laws of export destination countries and by the contractual requirements imposed by buyer and supplier companies.

In this context, certification and social compliance programmes used in the textile sector—particularly those listed below—are important supporting tools for due diligence processes, as they are used to demonstrate that businesses operating in global supply chains meet certain standards:

- ▶ **BSCI (Business Social Compliance Initiative):** Managed by amfori, BSCI is one of the most widely used social compliance programmes in the textile and apparel sector. The programme covers minimum social standards in areas such as working hours, wages, child labour, forced labour, discrimination, and freedom of association. BSCI relies primarily on a third-party audit model, with compliance monitored through audit scores and corrective action plans. In practice, it tends to focus mainly on first-tier suppliers, while its coverage at lower tiers of the supply chain may remain limited.

- ▶ **WRAP (Worldwide Responsible Accredited Production):** The WRAP certification programme, administered by Worldwide Responsible Accredited Production, is a social compliance programme that focuses particularly on ethical and lawful production conditions in the apparel sector. It sets standards on issues such as occupational health and safety, working hours, wages, forced labour, and legal compliance, and is implemented through a facility-based certification model. Although WRAP is especially common among manufacturers serving the US market, its coverage of lower tiers of the supply chain remains limited.
- ▶ **SA8000:** Developed by Social Accountability International (SAI), the SA8000 standard is a more comprehensive social certification system focused on human rights and working conditions. It includes detailed requirements on issues such as child labour, forced labour, discrimination, disciplinary practices, working hours, and freedom of association. In addition to facility-based audits, SA8000 promotes a management systems approach. However, because of its high cost, extensive documentation requirements, and the level of institutional capacity it demands, it tends to be adopted by a relatively limited number of businesses in practice.
- ▶ **Fair Wear Foundation (FWF):** The Fair Wear Foundation is a multi-stakeholder initiative focused on improving human rights and working conditions in the apparel sector. Unlike many other social compliance programmes, FWF does not focus solely on facility-level audits; it also considers brands' purchasing practices, pricing policies, and supply chain relationships. The programme aims to help member brands identify risks in their supply chains, operate worker grievance mechanisms effectively, and pursue continuous improvement processes. Fair Wear offers a more holistic framework, particularly in terms of worker participation, the independent handling of complaints, and the strengthening of brand responsibility. However, its scope is limited to member brands, and its overall uptake across the sector is lower than that of programmes such as BSCI.
- ▶ **ISO 45001 (Occupational Health and Safety Management System):** Published by the International Organization for Standardization, ISO 45001 is a management system standard designed to support the systematic management of occupational health and safety risks. In the textile and apparel sector, it serves as an important tool for preventing workplace accidents and occupational diseases associated with production processes. However, ISO 45001 is not a standard that covers all dimensions of human rights due diligence; it does not directly address issues such as wages, working hours, freedom of association, or supply chain relationships.

These programmes are not substitutes for due diligence, but complementary tools that can support it. While social compliance audits often provide a snapshot of current conditions, due diligence is concerned with identifying potential risks in advance, developing measures to prevent them, and addressing adverse impacts when they occur. In this sense, due diligence offers not an audit-driven approach, but one that is risk-based and open to learning.

▶ 5

A Roadmap for Textile Businesses

Six Steps Towards Human Rights Due Diligence

- ▶ **Step1** - Establishing a Due Diligence Policy Commitment
- ▶ **Step2** - Risk Assessment for Adverse Human Rights Impacts
- ▶ **Step3** - Taking Preventive Measures for Potential Human Rights Violations
- ▶ **Step4** - Taking Remedial Measures for Actual Human Rights Violations
- ▶ **Step5** - Establishing a Feedback and Complaints Mechanism on Human Rights Impacts
- ▶ **Step6** - Reporting and Disclosing Steps Taken Under Due Diligence Obligations

▶ **Step 1**

Establishing a Due Diligence Policy Commitment

For human rights due diligence to take root within a business, the first step is to articulate this approach through a clear and understandable policy commitment. A policy commitment is a framework document that sets out the business's basic position on human rights and how it understands its responsibility in this area. It serves as a reference point for all other steps in the due diligence process.

A policy commitment should not be treated only as a message to external stakeholders. It should also be seen as a tool for building a shared understanding within the business. In the course of day-to-day operations, human rights issues can easily be overlooked. A policy commitment helps make visible the principles by which the business intends to act and clarifies its overall approach.

In addition to clearly expressing the business's commitment to respecting human rights, the policy should also define the scope of that commitment. This should cover not only the business's own production activities and employment relationships, but also, to the extent possible, its business relationships within the supply chain. The policy should state clearly that the business is committed to preventing adverse human rights impacts and to addressing and remedying such impacts where they arise.

For small and medium-sized enterprises, a policy commitment does not need to be a highly technical or comprehensive document. What matters is that the business's commitment to respecting human rights is expressed in language that is clear, realistic and workable. In addition to covering the business's own operations, the commitment may also extend, as far as possible, to subcontracting arrangements and business relationships with suppliers. The text should also specify the management structure responsible for due diligence imp-

lementation, the responsibilities of employees in this area, and the business's expectations of its supply chain.

One of the most important considerations at this stage is ensuring that the policy commitment is genuinely owned within the business. The policy should not remain merely a written text; it should become a living framework that is known, referred to and actively used by the business owner, managers and those with responsibility in production processes. In small enterprises in particular, this sense of ownership often matters more than the written text itself. To support this, the policy commitment should be developed, as far as possible, with the participation of employees; training should be provided after its adoption to help align the organisation's culture with the policy commitment; and the policy should be shared with suppliers, business partners, sector stakeholders and public institutions.



When preparing a policy commitment in the textile sector, particular attention should be paid to the sector's labour-intensive structure, the working conditions that arise at different stages of production, and the prevalence of subcontracted production relationships. Ensuring that the commitment covers not only the enterprise's own workforce but also its links with subcontracted workshops and other business relationships helps align the human rights approach with the realities of production on the ground.

The policy commitment should set out a general position on the main risk areas that are particularly relevant in the textile sector, such as working hours, the timely and full payment of wages, occupational health and safety, the prevention of discrimination, and the elimination of child labour. This strengthens the policy's guiding function. At the same time, the commitment should not be expected to turn into a detailed list of risks; it is sufficient for it to establish the core principles and overall approach.

In practice, it is important that the policy commitment be understandable to workers in production settings. For this reason, using clear and simple language, supporting the text with visual materials where necessary, and communicating the content of the policy verbally to workers can all help strengthen ownership. Sharing the policy commitment with subcontracted workshops and suppliers can also help clarify human rights-related expectations at an early stage within business relationships.

► Step 2

Risk Assessment for Adverse Human Rights Impacts

The second step in the due diligence process is to identify potential human rights risk areas linked to the business's activities. The purpose of this step is to make visible the areas in which adverse human rights impacts may arise and to understand the connection between those risks and the business's own operations. At this stage, the expectation is not that businesses resolve the risks, but that they identify the risk areas and clarify their scope.

Risk assessment should cover all potential human rights risk areas and should address not only the business's current situation but also the possible impacts that may arise from its activities. At the same time, the assessment should take into account not only the business's own production sites, but all relevant processes and groups linked to its operations. This should include the business's directly employed workers, temporary or seasonal workers, workers involved in subcontracted production relationships, and, to the extent possible, other actors in the production environment.

A risk assessment does not require complex methodologies or technical reports. However, carrying it out with the support of an independent expert and with the participation of all potentially affected groups and other stakeholders, and informing it with observations from day-to-day production processes, feedback from workers, past incidents, and any available audit or inspection findings can help make the assessment more robust and reliable.

The risk assessment conducted at this stage is expected to answer the following questions: in which areas the company's activities may create human rights risks; which processes and groups are linked to those risks; how serious and urgent those risks are; how the company's activities may contribute to their emergence; and what possible avenues for addressing them may exist.



In the textile sector, identifying risk areas requires a holistic view of the entire production process rather than a narrow focus on a single stage of production. Working hours, workload and working conditions may vary across different stages such as cutting, sewing, ironing and packaging. For this reason, risk assessments should be designed to capture human rights risks that may arise at different points in the production process and to consider them together.

Issues such as working conditions, wages and working hours, occupational health and safety, discrimination, child labour, the risk of forced labour, freedom of association, and access to complaints mechanisms are among the main areas that need to be considered from a human rights perspective in the textile sector.

Particularly in subcontracted production relationships and workshop-type production settings, practices such as informal employment, underreporting of working days, or the failure to reflect actual working hours in official records can make risks harder to detect. For this reason, the process of identifying risk areas should take into account not only existing records, but also actual practices on the ground and the day-to-day realities of how work is organised.

In the textile sector, risks often arise not as isolated violations but as a result of the way business is conducted. For that reason, identifying risk areas should address not only the question of "where are the problems?" but also "which production and labour practices are contributing to these risks?"

▶ Step 3

Taking Preventive Measures for Potential Human Rights Violations

The third step in the due diligence process is to plan, implement and monitor preventive measures in response to the risks that have been identified. The purpose at this stage is to put in place, in a systematic way, measures that can reduce the likelihood of human rights harms occurring or limit their impact before they arise.

The first task is to prioritise among the identified risk areas. In doing so, businesses should take into account the severity, urgency and scale of the potential impact, as well as their own role in the emergence of the risk and their capacity to prevent or mitigate it. This helps ensure that limited resources are directed towards the areas where they can have the greatest effect.

Once priorities have been set, clear, achievable and time-bound objectives should be established for each risk area. These objectives should make explicit what is to be changed or improved and should be realistic in light of the business's existing capacity. Well-defined objectives help translate preventive measures into concrete action.

Preventive actions can then be planned in line with these objectives. Such actions may include reviewing existing ways of working, adjusting purchasing and contracting practices, establishing or strengthening monitoring and control mechanisms, and providing information and training to workers and managers. The central aim of preventive measures is to address the root causes of risk and prevent harms from occurring in the first place.

For preventive measures to be effective, it should be clear how they will be implemented, who will be responsible, over what timeframe they will be carried out, and what resources will be used. Different levels of responsibility may fall to business management, relevant employees and, where appropriate, business partners within the supply chain.

This step should not be treated as a one-off planning exercise, but as part of an ongoing cycle. Preventive measures should be developed through a participatory approach, monitored regularly during implementation, and assessed in light of the results achieved. Monitoring should be carried out in a planned and systematic manner through the use of appropriate indicators, and should also draw on information from complaints and feedback mechanisms. Reviewing the results makes it possible to understand how effective the preventive measures have been and what adjustments may be needed. On this basis, preventive measures should be reviewed, updated and strengthened over time. This approach helps ensure that preventive measures are effective, efficient, participatory and sustainable.



In the textile sector, preventive measures often need to focus on the production and work organisation practices that lie at the root of human rights risks. Order volumes, pressure linked to delivery deadlines, and fluctuations in production can directly affect working hours, workloads and wage practices. For this reason, it is important that preventive measures be designed not only to address outcomes, but also to tackle the ways of working that produce those outcomes.

Once priorities have been set, the objectives defined for each risk area should be aligned with the business's existing capacity and operating conditions. For example, where excessive working hours have been identified as a key risk, preventive measures may include reviewing production planning, assessing delivery timelines more realistically, or distributing workloads more evenly. Measures of this kind can often be introduced through small but effective adjustments to existing processes, rather than through costly structural changes.

For preventive measures to be effective in the textile sector, it is important to define clearly who will be responsible for implementing them, the timeframe within which they will be put into practice, and how they will be monitored. In particular, where subcontracted production relationships exist, preventive measures should not remain limited to the lead business alone. Sharing these measures with the production units involved in business relationships, and ensuring their participation in the process, can help prevent the same risks from recurring.



Example Scenario – Preventive Measures

Situation: During the company's risk assessment, it is observed that the area in which the production facility is located, as well as the areas where some supplier workshops operate, have a high concentration of migrant populations and low school attendance rates among school-age children. This points to the risk of early entry into working life and informal employment.

Potential risk: The risk that serious human rights abuses, such as informal employment and child labour, may arise through the company's own operations or through production units within its supply chain.

Preventive measures the business can take:

- Clearly communicating expectations regarding child labour and informal employment in business relationships with suppliers
- Strengthening basic checks on worker profiles in production sites
- Requiring suppliers to meet minimum standards for worker records and information
- Informing workers and managers about warning signs related to child labour and informal employment
- Establishing more regular monitoring and communication mechanisms in high-risk areas

▶ Step 4

Taking Remedial Measures for Actual Human Rights Violations

The fourth step in the due diligence process involves taking remedial measures where an adverse human rights impact or violation has occurred. This step focuses on how businesses are expected to take responsibility in situations where harms arise despite preventive efforts.

The nature and scope of remedial measures should first be determined by the seriousness of the violation or adverse impact. This requires taking into account the gravity of the harm, the individuals or groups affected, and the extent to which the impact can be reversed. At the same time, the level of the business's responsibility for the harm is also a key consideration. Whether the business caused the harm directly, contributed to it, or is linked to it through its business relationships will shape the scope of the measures to be taken.

Remedial measures should be effective, restorative and fair. Effectiveness means that the measure taken actually addresses or mitigates the consequences of the harm. A restorative approach requires not only acknowledging the violation, but also seeking, to the extent possible, to repair the harm caused. Fairness requires an approach that takes into account not only the interests of the business, but also the rights and needs of the individuals and groups affected.

The remedial measures that may be taken will vary depending on the nature of the violation and the context in which it occurred. They may include an apology or a clear statement acknowledging that a wrong has been committed, the provision of financial or non-financial compensation, and access to rehabilitation or support services. They may also include clear commitments aimed at preventing similar harms from recurring, ending a particular practice, or, where necessary, reviewing or terminating a business relationship.

Where possible, it is important to take into account the views of affected individuals and groups in determining and implementing remedial measures. This helps ensure that the measures taken are more meaningful, acceptable and fair. It also enables businesses to learn from past harms and improve their own practices over time.



In the textile sector, human rights harms often stem from the structural features of production and business relationships. Unrealistic delivery deadlines, intense order pressure, inadequate production planning, weak oversight and communication in subcontracted production relationships, and informal or precarious forms of work are among the main structural factors that create the conditions for such harms. For this reason, remedial measures should aim not only to address the harm that has occurred, but also to tackle the structural conditions that give rise to it.

In determining appropriate remedial measures, consideration should be given both to the consequences of the harm for the affected individuals and to the level of the business's responsibility for its occurrence. For example, where delayed or incomplete wage payments, excessive working hours, or insecure working conditions have been identified, remedial measures may include paying outstanding wages, properly recording and compensating overtime, reviewing payroll and wage payment procedures, reorganising work processes, or improving the relevant business relationships.

Remedial measures should not be seen only as a way of closing a past violation. They also provide an important opportunity for businesses to review and improve their own practices. For this reason, both the harms that have occurred and the responses to them should be assessed from the perspective of production processes, work organisation and business relationships, with a view to preventing similar situations from arising again. This helps ensure that remedial measures become part of a more systematic process rather than remaining isolated interventions.



Example Scenario – Remedial Measures

Situation: During internal assessment and monitoring activities, the business identifies that some workers have not been fully registered for social security and that actual working hours have not been accurately reflected in official records.

Identified adverse impact: Informal employment and the resulting infringement of workers' rights related to social security, wages and working hours.

Remedial measures the business can take:

- Correcting incomplete social security registrations and recorded working hours retroactively
- Compensating affected workers for any losses in wages and social benefits
- Reviewing existing practices related to wage payments, payroll and working time records
- Strengthening internal monitoring and control processes to help prevent similar impacts from recurring

▶ Step 5

Establishing a Feedback and Complaints Mechanism on Human Rights Impacts

The fifth step in the due diligence process involves establishing feedback and complaints mechanisms through which adverse human rights impacts and abuses can be raised, communicated and addressed. These mechanisms make it possible both to identify risks at an early stage and to respond to problems in a timely manner once they arise.

Complaints mechanisms should not be understood only as formal or highly complex structures. Especially in small and medium-sized enterprises, what matters is not the form of the mechanism, but whether it is functional, trustworthy and accessible. What is decisive is the existence of an environment in which workers and other relevant stakeholders are able to raise concerns and believe that these concerns will be taken seriously.

An effective feedback and complaints mechanism must, above all, be accessible. It should be understandable and usable for different groups, and no one should be excluded because of language barriers, literacy levels, working arrangements or differences in status. In addition to workers, those involved in subcontracted production relationships and, where possible, other relevant stakeholders should also be able to access these mechanisms.

It is equally critical for the complaints mechanism to be legitimate, impartial and aligned with internationally recognised human rights. For the mechanism to function in practice, those raising concerns must be confident that they will not face retaliation. This means that confidentiality must be protected, complaints must be handled impartially and in a manner consistent with internationally recognised human rights, and the process must be conducted fairly. In the absence of trust, even mechanisms that formally exist are likely to remain ineffective in practice.

These mechanisms are also expected to be transparent and predictable. Sharing basic information on how complaints will be received, assessed and handled helps build confidence in the process. At the same time, addressing complaints within a reasonable timeframe and, where possible, providing feedback to the person who raised the concern demonstrate that the mechanism is being treated seriously.

Feedback and complaints mechanisms should be seen not only as tools for resolving individual problems, but also as structures that support organisational learning and continuous improvement. The information generated through these mechanisms can help update risk assessments and strengthen preventive and remedial measures.



In the textile sector, as in many others, workers may hesitate to raise concerns because of fears related to job security, dismissal, or possible harm to their working relationships. This can allow human rights issues to remain hidden for long periods and delay timely intervention. For this reason, it is essential that complaints and feedback mechanisms be designed in a way that workers find trustworthy and usable.

In practice, particularly in sectors such as textiles where small and medium-sized enterprises are common, an effective complaints mechanism should not be understood as limited to written complaint channels alone. In workshop-based production settings in particular, combining different methods—such as face-to-face reporting, communication through trusted individuals, or simple feedback channels—can make the mechanism more accessible. It is important that these channels be designed so that workers are not excluded because of language barriers, literacy levels, or working arrangements. What matters is that complaints and feedback are properly recorded, addressed in a systematic manner, and appropriately followed up, so that the mechanism functions effectively and credibly.

▶ Step 6

Reporting and Disclosing Steps Taken Under Due Diligence Obligations

The sixth and final step in the due diligence process is to document and report the steps taken, the decisions made and the results achieved in relation to human rights. The purpose of this step is to make the business's approach to human rights visible, to ensure that its actions can be traced, and to support the further development of the process.

What matters at this stage is to record clearly and consistently what has been done under due diligence, why it was done, and what results have been achieved. This documentation is expected to cover the business's human rights policy commitment, the risk assessments carried out, the preventive and remedial measures taken, the feedback and complaints mechanisms established, and the overall outcomes generated through those mechanisms.

The documentation and reporting process is important not only for providing information to external stakeholders, but also as a tool for the business to review and improve its own practices. By bringing together the information generated in the previous steps, feedback received through complaints mechanisms, and monitoring results, this stage makes it easier to identify the strengths and weaknesses of the process.

This step strengthens the transparency and accountability dimensions of human rights due diligence. Documenting and communicating what has been done helps ensure continuity in the business's approach to human rights and supports its improvement over time.



In the textile sector, documentation and reporting often come to the fore through business relationships with buyers, audits or contractual requirements. However, within the scope of due diligence, documentation should not be treated merely as an exercise undertaken to meet external demands. It should also be understood as a tool that enables businesses to track and improve their own practices.

Since production conditions, business relationships and order structures in the textile sector can change over time, documentation and reporting also provide businesses with an opportunity to review past practices and identify emerging risks. In this sense, record-keeping is not simply a retrospective obligation, but also a learning tool that supports the continuity of the due diligence process.

▶ 6

Due Diligence Checklist

A Quick Self-Assessment Tool



When preparing a **policy commitment**, particular attention should be paid to the labour-intensive production structure of the textile sector, subcontracting relationships, and the effects of time pressure on human rights.

1. Do you have a policy commitment on due diligence? Yes No

If yes, when preparing your policy commitment, did you:

Consider international standards? Yes No

Consider national standards? Yes No

Consider the policy documents of the companies in whose supply chains you operate? Yes No

Identify and prioritise the standards relevant to your company? Yes No

Does your policy commitment:

Bear the signature of your company's highest-level manager or governing body? Yes No

Cover your entire supply chain? Yes No

Include company and employee responsibilities for preventing adverse human rights impacts, the management structure responsible for implementation, and the company's expectations of its supply chain? Yes No

Regarding the implementation of your policy commitment, have you:

Prepared an action plan, including targets? Yes No

Designated a team/person responsible for implementation? Yes No

Conducted regular training for your own employees? Yes No

Provided information to all relevant parties, including suppliers, institutions with which you have business relationships, sector stakeholders and public authorities? Yes No



When conducting a **risk assessment**, due consideration should be given to factors such as the different stages of production in the textile sector, workshop-based production arrangements, multi-layered supply chain structures, and the presence of migrant labour.

2. Do you conduct a risk assessment regarding adverse human rights impacts? Yes No

If yes, when preparing your risk assessment, did you:

Receive support from independent experts? Yes No

Seek the views of potential risk groups and all relevant stakeholders? Yes No

Does your risk assessment:

Cover all current and potential risks affecting company workers, consumers and the wider community? Yes No

Cover all tiers of the supply chain and all stages of production? Yes No

Pay particular attention to vulnerable groups that may be more affected by risks? Yes No

Include a detailed assessment for each identified risk, including its cause, its link to company activities, its scale and the stakeholders concerned? Yes No

Is it reviewed and updated regularly, or is there a plan in place for regular review and updating? Yes No



When planning **preventive measures**, particular attention should be given to the impact of order pressure, short delivery deadlines and production planning on working conditions in the textile sector.

3. Do you take preventive measures against potential human rights violations? Yes No

If yes, do you have a risk prevention plan? Yes No

If yes, does your risk prevention plan:

Include a prioritisation strategy for the risks identified during the risk assessment? Yes No

Include specific, measurable, achievable, realistic and time-bound targets? Yes No

Include the preventive actions to be carried out? Yes No

Include a timeline? Yes No

Include the roles and responsibilities of all relevant parties, including company management, employees, supply chain stakeholders and other relevant actors? Yes No

Include a monitoring plan with indicators, methods and frequency? Yes No

Include a plan for securing the financial and human resources needed to implement preventive measures? Yes No

Is it monitored, reviewed and updated regularly? Yes No



Remedial measures should address not only individual violations, but also the production and work organisation practices specific to the textile sector that give rise to such violations.

4. Do you take remedial measures to address actual human rights violations? Yes No

If yes,

When determining the measures to be taken, do you take into account the severity of the impact and the company's level of responsibility for its occurrence? Yes No

Do you assess the effectiveness of the remedial measures you have taken? Yes No



It is important that **complaints mechanisms** be genuinely accessible in workshop-based production settings and that verbal complaints are also properly recorded.

5. Do you have a feedback and complaints mechanism in relation to human rights impacts? Yes No

If yes,

Is the identity of the complainant kept confidential? Yes No

Have measures been put in place to protect complainants from any form of retaliation? Yes No

Is it easily accessible to all relevant stakeholders, including those who may face barriers to access? Yes No

Is there a clearly written and easy-to-understand description of how feedback and complaints can be submitted, how they will be handled, and when and how they will be resolved? Yes No

Are incoming feedback and complaints taken into account during risk assessment and the preparation of the risk prevention plan? Yes No

Is the effectiveness of the feedback and complaint mechanism monitored and assessed regularly? Yes No

Are incoming feedback and complaints, and their outcomes, shared transparently with relevant parties and the public? Yes No



Documentation, reporting and communication should be seen not only as a way of responding to audit requirements, but also as regular tools for review and learning, particularly in the context of changing production conditions in the textile sector.

6. Do you report on your due diligence activities? Yes No

If yes, does your report:

Cover all activities carried out as part of due diligence, including risk assessment, the preparation of prevention plans, and related measures? Yes No

Describe potential and actual adverse human rights impacts? Yes No

Cover all preventive and remedial measures taken in relation to potential and actual adverse human rights impacts? Yes No

Include the results of assessments of the effectiveness of the measures taken? Yes No

Include information on feedback and complaints received, and how they were addressed? Yes No

Include lessons learned for improving the due diligence process? Yes No

Is it shared publicly on a regular basis? Yes No

▶ Conclusion

Human rights due diligence is not, for businesses operating in the textile sector, a one-off compliance exercise or simply a means of responding to external audits. Rather, it represents a holistic management approach that extends from production planning and supplier relationships to work organisation and grievance mechanisms. The effectiveness of this approach is directly linked to an institutional mindset that recognises the existence of risks, does not limit responsibility to a company's own facilities, and is grounded in a preventive perspective.

The steps, checklists and guiding questions presented in this note are intended not to impose an expectation of “perfection” on businesses, but to support a realistic assessment of current practice and a systematic approach to areas for improvement. For small and medium-sized enterprises in particular, it is important to see due diligence not as a burden that exceeds their capacity, but as a tool that makes risks more manageable and helps strengthen business continuity and commercial relationships.

Strengthening a rights-respecting approach to production in the textile sector will not be possible through the efforts of individual businesses alone. It depends equally on dialogue and cooperation among buyers, suppliers, professional associations, trade unions and public institutions. This note has been prepared in the hope that it will help businesses better understand their own areas of responsibility and approach human rights due diligence as an ongoing process of institutional learning and improvement.

