



# HUMAN RIGHTS DUE DILIGENCE TOOL

## **Purpose:**

This document guides high-level human rights due diligence, informed by key concepts contained in the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#). Depending on context, use of this tool should be accompanied by more detailed due diligence.

## **Accompanying Resources:**

This tool can be used alongside the following resources:

- List of human rights
- Vulnerable groups framework
- Modules 1 and 3 of the GIFCT human rights training

## **Process:**

STEP ONE:	STEP TWO:	STEP THREE:	STEP FOUR:
Describe the Context	Consider Policies, Processes, and Procedures	Consult Externally	Take Action

## STEP ONE: DESCRIBE THE CONTEXT

These questions help clarify the human rights challenge.

Question	Answer
<b>What is the situation?</b> Provide a short description of the challenge.	
<b>Who are the affected stakeholders in this situation?</b> Examples include users, members of a particular community, non-users, workers.	
<b>What human rights impacts could occur?</b> Review the accompanying list of internationally recognized human rights (e.g., restrictions to freedom of expression if we remove content; bodily security risk if we do not remove content). Note: not all rights listed will be relevant in every case.	
<b>Are vulnerable populations potentially impacted?</b> Review the accompanying list of groups or populations that may be at heightened risk of becoming vulnerable or marginalized.	
<b>What is the severity of the human rights impacts?</b> Consider how many people may be impacted, the gravity of the harm for those impacted, and how easily the impact can be remediated later.	

## STEP TWO: POLICY, PROCESSES AND PROCEDURES

These questions help clarify the relevant company policies, processes, and procedures that apply and therefore ground your due diligence in existing approaches.

Question	Answer
<b>What is the company policy?</b> Is there a policy, process or escalation procedure describing what to do in this situation? What does it say?	
<b>What does previous human rights due diligence say?</b> Was this situation anticipated in previous human rights due diligence or other similar risk assessment exercise? What does that due diligence say about the approach that should be taken now?	
<b>Who at the company am I required to call? Who should I turn to for assistance?</b> Examples include the public policy team, human rights team, privacy team, product policy team, legal team.	

### STEP THREE: EXTERNAL CONSULTATION

These questions help identify allies who may be able to provide advice.

Question	Answer
<b>Are there people outside the company I can call for advice?</b> Examples include civil society organizations, subject matter experts, governments / embassies (e.g., if related to a crisis situation in a specific country), academics, other companies, and human rights consultants	
<b>Is it appropriate to contact them in this case?</b> What is your relationship with the external organization or expert? Do you have a trusting relationship based on previous interactions? What are the risks and opportunities of making contact now to both you and them?	

## STEP FOUR: ACTION PLAN

These questions help create a plan of action.

Question	Answer
<b>What can we do to avoid, prevent, or mitigate the human rights impacts?</b> Consider whether the number of people impacted can be reduced / impact made less severe.	
<b>What influence or leverage do we have to avoid, prevent, or mitigate the human rights impact?</b> Consider collaboration with other companies facing a similar challenge or with civil society organizations or other stakeholders with shared priorities.	
<b>What transparency should we provide?</b> Can we notify affected stakeholders, such as users? Can we issue a customer notice or public statement? Are there legal, business, or human rights reasons to restrict transparency, such as putting people at risk?	
<b>If we can't be transparent, what alternatives exist?</b> Can we be transparent at a later date? Are there individuals or organizations we should communicate with (eg., who should be aware of our approach, even if we are not able to communicate publicly)?	
<b>What records should exist?</b> What written record should we keep (e.g., of a government demand)?	