

Effective Engagement with Technology Companies

A Guide for Civil Society

MAY 2024

Background

Civil society has long sought to influence the policies and practices of technology companies in order to address adverse impacts on people and society and advocate for user rights. However, it can be challenging for civil society organizations (CSOs) to engage effectively and make impactful recommendations.

Technology companies are often complex and opaque. CSOs may struggle to identify who to engage or find themselves engaging with a confusing variety of company points of contact, often without any indication of how their feedback was received and what outcomes were achieved. They may also lack the resources to engage companies as frequently and as deeply as both parties desire. At the same time, technology companies also struggle to effectively engage with civil society. The teams empowered to engage with civil society are often under resourced, and the rapid pace of product development and human rights risk mitigation makes it difficult for companies to engage regularly with CSOs and incorporate their inputs in a meaningful way.

There is also distrust on both sides. Companies may feel CSOs are too confrontational and unwilling to understand their point of view, or that their recommendations lack specificity and are therefore inactionable. CSOs may feel companies are extractive or not genuine in their engagement. These issues are magnified for global majority CSOs, who often receive less access to and attention from technology companies than their counterparts in Europe or the US, where most of the large companies are headquartered.

Technology companies should engage with affected stakeholders as part of their responsibilities under the UN Guiding Principles on Business and Human Rights (UNGPs), the authoritative global standard on responsible business conduct. Stakeholder engagement is also increasingly required as part of compliance with emerging regulation, such as the EU Digital Services Act (DSA).

Achieving meaningful stakeholder engagement in the technology industry also benefits both civil society and companies. CSOs can provide technology companies with insights that companies cannot attain alone, and meaningful stakeholder engagement can result in better risk management, better products and services, and better business strategies. Similarly, effective engagement with technology companies can help many CSOs achieve their missions by improving their understanding of new technologies, influencing corporate conduct, and fostering opportunities for collaboration.

BSR regularly works with technology companies to improve their stakeholder engagement strategies and practices. Although much work remains to be done, there are existing resources and initiatives focused on improving the practices of companies, such as the UN B-Tech Project and the Global Network Initiative (GNI). CSOs, however, have largely had to learn how to engage with companies through trial and error. While there are some introductory resources geared toward CSOs that are helpful starting points (for example, [see this guide](#) developed by Global Partners Digital and GNI), there is a need for detailed tactical guidance that draws upon this experience and that CSOs with varying levels of experience can learn from. The purpose of this guide is to provide just that.

Our Approach

This guide has been informed by one-on-one consultations with a wide variety of company representatives and civil society actors experienced in stakeholder engagement, a series of workshops with CSOs, existing resources on stakeholder engagement, and BSR's own experience facilitating dialogue between CSOs and company stakeholders. Over the course of our 20-year history working closely with technology companies to improve their human rights practices, BSR has developed in-depth knowledge of how these companies operate, which CSO engagement strategies resonate, what barriers exist, and what needs to happen to improve company engagement practices. Similarly, through extensive stakeholder engagement with civil society as part of conducting human rights due diligence (HRDD) for a wide range of technology companies, we are familiar with the many challenges and frustrations CSOs face when engaging with technology companies. However, there is a wealth of knowledge on this topic across both civil society and technology companies that has been crowdsourced and incorporated into this guide. In many ways this is not a guide by BSR, but rather a guide by the broader community of people working in the technology and human rights / responsible technology field.

How to Use This Guide

This guide is meant to be a practical resource for anyone seeking to engage with global technology companies on digital rights issues related to the development, deployment, and use of their products and services. It is not a guide about how to conduct public advocacy, although it does discuss the interplay between public advocacy and direct engagement. The guide also does not focus on engagement on supply chain issues or issues related to a company's direct operations; however, many of the tips and best practices are broadly applicable.

The guide is written from different perspectives at different times, sometimes from the standpoint of companies and other times from the standpoint of civil society. The primary audience for this guide is civil society; however, other stakeholders such as government entities, investors, and academics may find the contents helpful for better understanding engagement between civil society and companies. Additionally, the guide may be a helpful reference for technology companies looking to improve their engagement with civil society.

Finally, different parts of the guide may be more or less useful to different readers depending on prior experience engaging with companies and the companies they are targeting for engagement. Because the guide is focused on engagement with global technology companies that are largely headquartered in the US and Europe, the advice may not be pertinent or culturally appropriate for companies across all geographies, particularly those headquartered in authoritarian countries.

The guide consists of the following sections:

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Key Terms:

This section defines effective engagement and other key terms used throughout the guide and should be reviewed by all readers for clarity prior to proceeding.

2

P. 7

How Technology Companies Conduct Stakeholder Engagement:

This section describes why and how companies engage with civil society. It lists different purposes, formats, and roles or teams that are typically involved, describes how the type of company, size, and organizational structure impacts engagement, and discusses the current state of stakeholder engagement in the technology sector and where it is headed in the future. This section will be most helpful for readers who are less experienced in engaging with technology companies or who only have experience with select companies or parts of the industry.

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Achieving Effective Engagement:

This section identifies and describes common characteristics of effective civil society-company engagement and discusses the barriers to achieving it. It is important for all readers to review, but those with less experience engaging with companies are likely to find it more helpful.

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Practical Tips and Best Practices:

This section consists of a long list of practical tips and best practices for civil society in engaging with technology companies that have been crowdsourced from the consultations and workshops carried out to inform this guide. Readers of all experience levels are likely to find something valuable in this section.

Acknowledgments

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Disclaimer

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1

Key Terms

This section defines effective engagement and other key terms used throughout the guide and should be reviewed by all readers for clarity prior to proceeding.

Technology company

A **technology company** is any company focused on the research, development, or distribution of technologically based goods and services. For the purposes of this paper, that can include any company operating at the various parts of the ecosystem described in BSR and the GNI's [Across the Stack Tool](#). This includes anything from social media platforms to search engines, cloud service providers, telecommunications companies, enterprise software providers, hardware manufacturers, artificial intelligence companies, and online retailers. The term “company” is used throughout this guide as shorthand for technology company.

Stakeholder

A **stakeholder** is an individual, group, or entity who directly or indirectly affects or is affected by a company's operations, activities, products, or services, and can be either internal or external to the company. Common stakeholders include employees, customers, users, consumers, suppliers, business partners, investors, trade unions, CSOs, policymakers, regulators, and the communities impacted by operations. This guide is focused specifically on CSOs as company stakeholders.

Rightsholder and affected stakeholder

The terms **rightsholder and affected stakeholder** are used for individuals or groups whose rights are or could be directly impacted by business activities, products, or services. This is distinct, but not mutually exclusive, from other stakeholders (such as CSOs) who may have interest, insights, expertise, and awareness relevant for rightsholder interests, but who may or may not themselves be rightsholders. All rightsholders are stakeholders.

According to the UNGPs, companies should engage with potentially affected stakeholders (i.e., rightsholders) by consulting them directly. In situations where such consultation is not possible, companies should engage reasonable alternatives, such as independent experts, CSOs, and human rights defenders. In practice, this can often mean that companies should engage both large international or national organizations as well as grassroots or local organizations.

Stakeholder engagement

The [OECD](#) defines **stakeholder engagement** as an “interactive processes of company engagement with relevant stakeholders.” Stakeholder engagement guidance for companies generally anchors on the term “meaningful”—i.e., that companies need to conduct **meaningful stakeholder engagement**. The OECD defines meaningful engagement as characterized by two-way communication based on the good faith of participants on both sides. Meaningful stakeholder engagement is proactive, responsive, and ongoing, and is often conducted before business decisions are made.

Stakeholders that choose to engage with companies generally expect the interaction to generate change, so engagement should be treated as a dialogue, not a one-way information dissemination process. This means that the company engages with the genuine intention to understand how stakeholders are affected by its activities and is prepared to both pursue opportunities identified and address adverse impacts. For further exploration of meaningful engagement, check out the [UN Guiding Principles on Business and Human Rights](#), the [OECD Due Diligence Guide on Responsible Business Conduct](#), BSR's [FAQ on Stakeholder Engagement](#), and ECNL's [Framework for Meaningful Engagement](#).

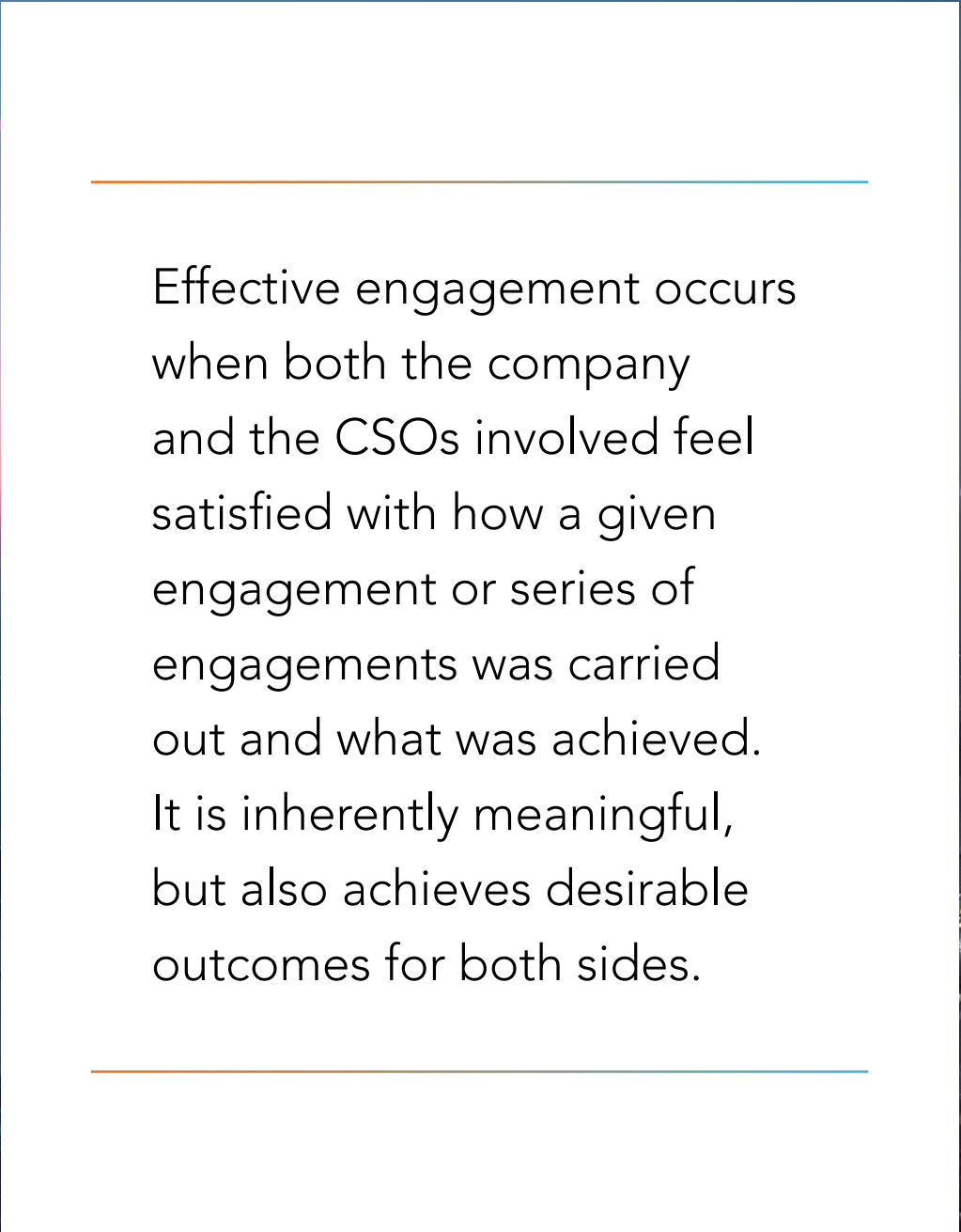
Effective engagement

Meaningful engagement is largely focused on the process of stakeholder engagement rather than the outcomes. Given their resources, position of power, and role in convening engagement, companies bear the primary responsibility for ensuring stakeholder engagement is meaningful. However, engagement is a two-way street, and civil society has a role to play and goals to achieve as well. That's why this guide uses the term **effective engagement**.

Effective engagement occurs when both the company and the CSOs involved feel satisfied with how a given engagement or series of engagements was carried out and what was achieved. It is inherently meaningful, but also achieves desirable outcomes for both sides.

However, assessing whether an engagement was effective can be challenging. Typically, CSOs engage technology companies with specific objectives in mind—a change to a policy, process, product, or other desired action. However, having visible impact on a company often requires time, relationship building, and significant shifts in the will and/or capacity of a company to act. Much like governments, companies are not monolithic and are often full of contradictions. Large companies are complex bureaucratic machines involving constantly shifting priorities and teams competing for resources. As with any advocacy goal, achieving everything is rare. Small or partial wins are most common, and consistent effort and messaging over time is often needed to build a case for change.

Because of this, it is helpful to think more broadly when defining what success means in a given engagement. Although advocacy objectives may not have been fully or quickly achieved, perhaps valuable relationships that create a foundation for progress inside a company were established or strengthened, or the company gained helpful guidance that informed future decision-making, or the CSO gained new information it had been seeking or received genuine acknowledgement or apology for an issue that was raised. As one stakeholder put it, “Not all battles can be won, but progress is often possible. It's not a zero-sum game.”



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2

How Technology Companies Conduct Stakeholder Engagement

This section describes why and how companies engage with civil society.

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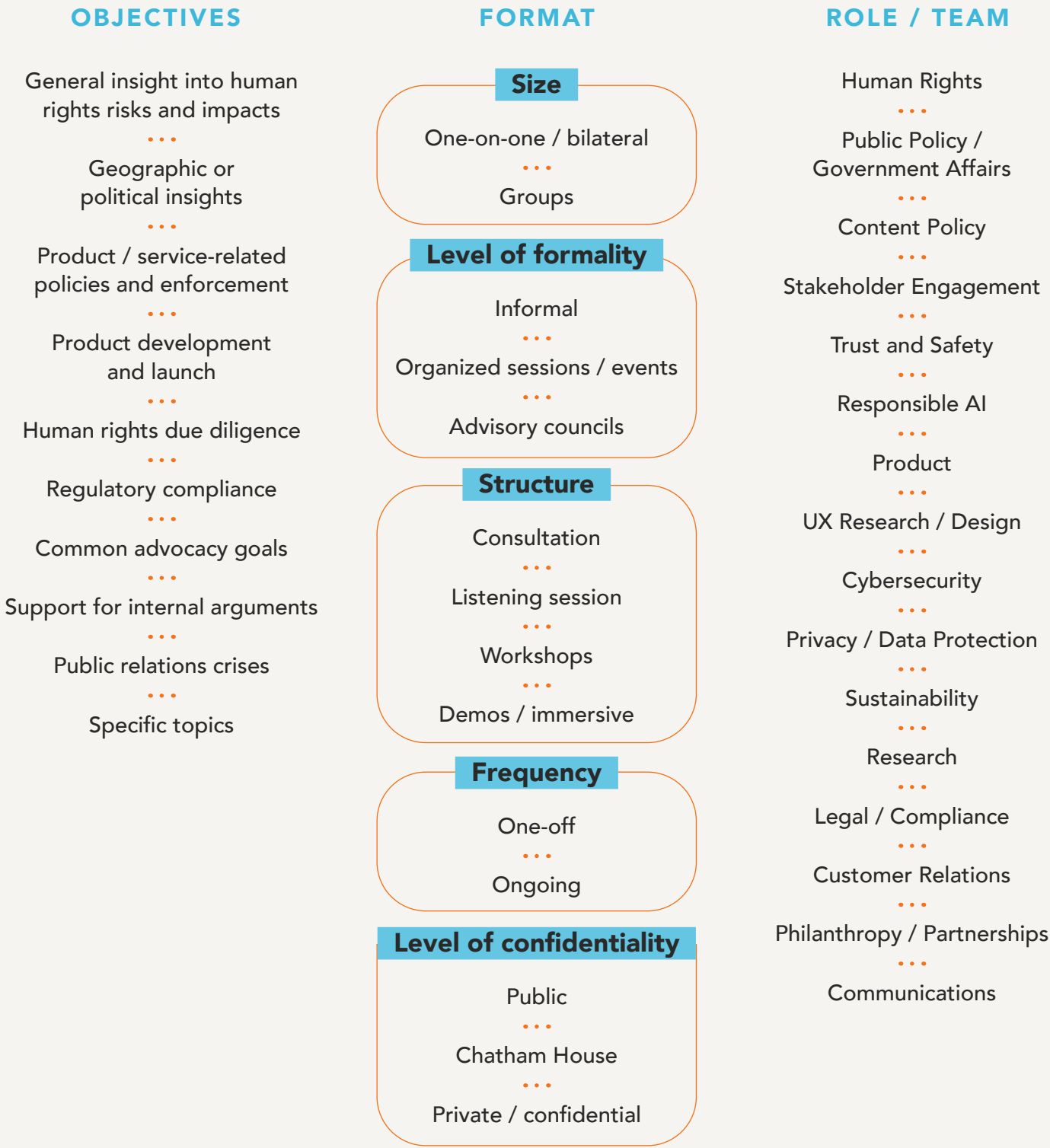
- » Objectives: Why Companies Conduct Stakeholder Engagement
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- » Roles and Teams: Who Conducts Engagement Inside Companies?
- » Understanding Company Structure
- » The State of Stakeholder Engagement

The first step to effectively engaging with technology companies is understanding why and how they conduct stakeholder engagement in the first place. The About This Guide section mentioned the overarching reasons companies engage with civil society — because it is the right thing to do, it is expected by global standards and emerging regulations, and it is important for identifying and addressing risks to people and society and maximizing positive impacts.

However, beyond these broader reasons, technology companies engage with CSOs for a wide variety of specific objectives, led by various teams or roles, and in a wide variety of formats. Engagement also varies significantly based on the size of the company, the type of company, and its exposure to human rights risk. In this section we explore why and how technology companies conduct stakeholder engagement and provide examples of what that looks like in practice. While engagement can also be initiated by CSOs, this section focuses on the company perspective for initiating or participating in engagement. With this information CSOs can place their engagement in the broader context and plan their approach accordingly.

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Why and How Technology Companies Conduct Stakeholder Engagement



Objectives: Why Companies Conduct Stakeholder Engagement

Technology companies engage with civil society stakeholders for many reasons, some of which are more relevant for certain types of companies than others. Some of the most common include:

- **General insight:** Gaining general insights into human rights-related risks or impacts associated with their products and services based on CSO's areas of expertise. Companies may seek general insight on principle—because they believe it's valuable and the “right thing” to do—or to address reputational concerns.
- **Geographic or political insights:** Securing expertise in particular geographies to inform market entry, exit, or strategies for ongoing presence, or to gain insight into geographically relevant political, legal, or regulatory trends.
- **Product / service-related policies and enforcement:** For online platforms this might involve engagement on various aspects of trust and safety, such as gathering feedback about content policies—what content and behavior is or is not allowed on their platforms—how those policies are enforced, issues faced by particular communities or geographies, and escalations or flagging of violating content or problematic accounts. For software or hardware companies, this might entail gathering information about abuse or misuse of their products and services.
- **Product development and launch:** Informing how the company develops and deploys their products and services, including about potential risks associated with products and how they can be addressed, as well as to assess how new product launches will be received. This also includes understanding needs and use patterns of particular user groups.
- **Human rights due diligence:** Conducting stakeholder engagement is an important part of implementing the UNGPs and is often conducted as part of human rights assessments, particularly to help companies understand impacts on individuals from marginalized or vulnerable groups.
- **Regulatory compliance:** Gathering stakeholder input as part of mandatory regulatory compliance processes related to corporate responsibility, which is becoming increasingly common within the technology sector.
- **Common advocacy goals:** Collaborating on common advocacy goals, often related to legislation that both the company and the CSOs oppose and therefore share a common interest in working together to advocate against.
- **Support for internal arguments:** Demonstrating external support for a decision in order to convince skeptical internal decision-makers that their proposed choice is the right one. In these cases the people engaging with CSOs do not need to be informed or convinced, but rather are seeking CSOs willing to “go on the record” for supporting their internal argument.
- **Public relations crises:** Meeting with relevant CSOs after being publicly criticized for harm caused by the company's products or services, both to address reputational risk and to gather input for how to address the harm.
- **Specific topics:** Leveraging expertise of CSOs on particular issues of relevance for the company. For example, issues with the company's privacy or security practices, how to address health misinformation, child safety practices, company connection to harm during an election period, what their user reporting system should look like, or how they can protect the accounts of human rights defenders.

Format: What Does Engagement Look Like?

Instances of stakeholder engagement carried out by technology companies can take a wide variety of overlapping forms depending on the purpose and context of the engagement. Different formats may be used throughout a broader engagement. For example, one-on-one meetings with stakeholders could be held to gather initial feedback on a new content policy, followed by a group engagement to present and discuss the final version.

Size

- **One-on-one / bilateral:** The most common engagement format is a one-on-one or bilateral meeting between a single civil society stakeholder and the company or representative of the company. One-on-one meetings are most amenable to building relationships with key company contacts, for companies to share private or insider information, and for the CSO to feel most comfortable speaking freely.
- **Groups:** Companies will also engage with groups of different civil society stakeholders. This occurs when CSOs are working together in a coalition with a common agenda, or when a company wants to share or present information.

Level of Formality

- **Informal:** Engagements with companies can happen very informally or opportunistically, such as meeting on the sidelines of a conference or over coffee, or doing an unstructured call.
- **Organized sessions / events:** Other engagements involve established, formalized processes and are highly organized when companies are seeking input on something specific like a product or policy, or as part of a human rights assessment.

- **Advisory councils:** External advisory councils are formal expert bodies that a company consults with regularly about a variety of issues. They often include civil society stakeholders with particular expertise or who represent key affected stakeholder groups, and typically have a rotating membership.

Structure

- **Consultation:** Consultations typically involve the company coming to CSOs to gather feedback on a particular topic with a particular set of questions. It might include a presentation of information or a preview of a product or policy launch. CSOs can also organize consultations with companies to ask questions or seek the company's perspective on an issue.
- **Listening session:** Listening sessions involve the CSOs sharing information, insight, or feedback or raising awareness with a company while company participants listen and ask questions. They can be led by both companies and CSOs.
- **Workshops:** Workshop-style engagements involve activities and co-creation and are used for purposes such as designing a partnership model or creating tools and resources for at-risk user communities. They can be organized and led by both companies and CSOs.
- **Demos / immersive:** Product demos, tabletop exercises, or other immersive experiences are designed to inform stakeholders about the features and capabilities of products or processes, or to enable stakeholders to provide specific or technical feedback. They are typically organized by the company.

Frequency

- **Ongoing:** Companies may maintain long-term relationships with a select number of CSO stakeholders and consult with them on an ongoing basis about relevant issues.

- **One-off:** Companies may engage with a given CSO just once. This often occurs when new, targeted, or time-bound issues arise, or when a company has immature engagement practices and does not yet understand the value of more structured, ongoing engagement.

Approach to Confidentiality

- **Public:** Engagements can be conducted with no expectation of confidentiality, and even in an open and public setting (e.g., a conference) that is widely accessible. These are generally geared toward awareness-raising around something a company is comfortable sharing widely—such as publicly available resources or tools or a major product or policy announcement.
- **Chatham House:** Engagements are often conducted under the “[Chatham House Rule](#),” which means that participants are free to discuss and utilize the information they received, but the identities or affiliations of speakers and participants may not be revealed. This approach is often used in group discussions to create a level of trust among participants and make participants feel more comfortable sharing opinions.
- **Private / confidential:** Engagements are also conducted with an expectation of confidentiality to enable companies to share relevant internal information. This is sometimes simply requested in good faith and is known as the Vegas rule—what happens in the meeting, stays in the meeting. It may also be formalized in a non-disclosure agreement (NDA).

Roles and Teams: Who Conducts Engagement Inside Companies?

With the growth of human rights awareness inside technology companies and public policy trends pushing companies to identify and address risks to people and society, a wider range of teams and roles inside companies are engaging with civil society stakeholders. Below are several of the most common.

- **Human Rights:** Human rights teams are horizontal teams in charge of overseeing a company’s implementation of international human rights standards, like the UNGPs and the OECD guidelines. They create human rights policies, commission and carry out human rights due diligence, and communicate publicly about the company’s efforts. They coordinate closely with relevant teams (such as those below) as part of their efforts. When technology companies have human rights teams, these teams tend to lead on engaging and maintaining relationships with human rights stakeholders, connecting them with other roles or teams as relevant.
- **Public Policy / Government Affairs:** Public policy or government affairs teams are in charge of engaging on public policy issues (e.g., setting out the company’s view on emerging legislation) and interfacing with government actors and regional or international authorities (e.g., the EU, the UN). They may work at the national or international level and may also focus on certain public policy issue areas (e.g., data protection, mis/disinformation). Public policy or government affairs contacts often develop and lead relationships with CSOs in their geographic or policy jurisdictions. Some engage on a wide variety of issues relevant for the company as lead points of contact for CSO stakeholders, whereas others engage specifically on legislative, regulatory, or product-related issues.

- **Content Policy:** Some online platforms have teams dedicated to developing and updating their content policies, which describe what content and behavior is or is not allowed on their platforms. Members of these teams may engage with relevant CSO stakeholders to inform their content policies—for example, to gather insight into where they should “draw the line,” to understand how particular communities could be adversely affected by a new policy, or to identify issues with current policies.
- **Trust and Safety:** Trust and safety teams manage the implementation and enforcement of the content and conduct-related policies of online platforms. They anticipate, manage, and mitigate the risks and harms that may occur through using a platform, including everything from spam and copyright infringement to harassment, hate speech, and child sexual exploitation. Content policy is a part of trust and safety at many companies. Trust and safety teams are largely operational and internally facing but may engage CSO stakeholders on targeted issues, such as via trusted flagger programs. As regulation emerges that involves trust and safety teams and requires external stakeholder engagement, such as the DSA and the UK Online Safety Act (OSA), trust and safety roles are increasingly engaging with civil society.
- **Stakeholder Engagement:** Some technology companies have individuals or teams with “stakeholder engagement” in their title, whose primary responsibility is to engage with external stakeholders—including civil society—to gather input and insight into relevant issues. In some cases, these individuals will be the primary company point of contact for CSOs. They may also carry out formal consultations (e.g., Meta’s content policy stakeholder engagement team).
- **Responsible AI:** Many technology companies have responsible AI teams charged with implementing their AI principles and otherwise ensuring the company is developing and deploying AI responsibly. These teams may engage civil society

stakeholders to inform their work, often as experts on particular issues and to understand risks to particular communities.

- **Product:** Product teams consist of the engineers, product managers, designers, and legal advisors involved in developing and maintaining a product or service. They may be involved in engaging with civil society stakeholders to inform the product development process or to gather feedback and understand issues after a product has been launched. These roles typically do not have experience in engaging with civil society, so engagements involving product teams are often facilitated by someone from a team with this experience, such as human rights or responsible AI.
- **UX Research:** UX researchers study the end users of a product or service to understand what they need or want, how they use their products, and the issues or challenges they face. The insights they gather are then used to inform the product and policy development processes. UX researchers use sophisticated research methods and may engage CSOs in interviews, focus groups, or demos / immersive exercises on issues of relevance, such as the experiences and issues faced by vulnerable user groups, or views on a product’s privacy and security protections while using it.
- **Cybersecurity:** Cybersecurity teams are charged with keeping a company’s assets and customers/users safe from cyberattacks or other digital threats. They develop policies and technical security architecture, conduct threat assessments, and detect, deter, and respond to attacks or intrusions. They may also focus on identifying and deterring misuse and abuse of products and services by coordinated actors. Cybersecurity staff may engage with CSOs on topics of mutual interest, such as securing the accounts of human rights defenders or understanding the security threats CSOs face using their products.

- **Privacy / data protection:** Privacy and data protection teams create and implement a company's privacy and data protection principles and policies. They oversee compliance with legal requirements (e.g., national privacy laws, the GDPR) and advise product teams on privacy practices associated with products and services. They can work horizontally across the company at the international or national level, and at some companies they are embedded within project teams and empowered to address broader risks to people and society. They may engage with CSOs to gather feedback into organization-wide privacy and data protections policies and practices or on privacy issues of specific products.
- **Sustainability:** Sustainability teams are in charge of identifying and addressing the company's adverse impacts to people and the environment and engaging in opportunities for positive impacts. They typically include staff who focus on environmental and climate impacts, supply chain sustainability, social impact, and sustainability reporting. Human rights issues are a component of social impact element of sustainability. In some technology companies—notably telecommunications, hardware, and software companies—the human rights function sits within the sustainability team. In technology companies without a human rights or other team that might naturally engage with civil society, members of the sustainability team may lead engagement.
- **Research:** Some technology companies have research arms that conduct and publish academic-style research. This is especially common in the AI field, where research teams tend to operate relatively independently of the company and often develop the models and approaches the company then utilizes in products and services. This is known as the “research-to-product pipeline.” Research teams may engage or even collaborate with civil society stakeholders as part of conducting research.
- **Legal / Compliance:** The legal and compliance teams within companies are responsible for a wide range of issues, including analyzing and securing compliance with relevant laws and regulations (e.g., on data protection, online content,

competition, and consumer protection), reviewing a company's proposed changes to relevant laws, scrutinizing government legal requests (e.g., for user/customer data, content removal, or service shutdowns), drafting and supervising contracts and service terms with suppliers, users, and other actors, and protecting company trade secrets, intellectual property, and other confidential information. At some technology companies, legal staff may approve or deny the CSOs that companies can engage with on certain topics, and staff may participate in sensitive or confidential engagements with CSOs to oversee and monitor the sharing of company information. With increasing regulatory requirements involving stakeholder engagement, legal and compliance staff are likely to participate more frequently in engagement related to these requirements.

- **Customer relations:** Customer relations teams within technology companies carry out the day-to-day interaction with customers and users seeking to gain access to a product or service or problem-solve issues. Although these teams do not typically formally participate in stakeholder engagement with CSOs, they may be the first point of contact at a company for a CSO reporting issues, which may be escalated to other teams.
- **Communications:** Communications teams are tasked with engaging with the media and generally communicating with external stakeholders and the broader public. They typically include staff who manage marketing, media relations, crisis communications, and other external communications functions. Communications teams organize product launches, media interviews, write copy and press releases, monitor news and public sentiment about the company, and create plans to address unfavorable coverage or crisis situations. Some technology companies involve their communications teams in engagements with civil society, particularly when that engagement involves something with official company communications, such as a product or report launch or a policy change.

- **Philanthropy / Partnerships:** Philanthropy or partnership teams fund and partner with external entities, including civil society, as part of the company’s positive social impact agenda. Sometimes these teams are called “social impact.” While they interact with the CSOs they fund or pursue partnerships with, they may also engage with CSOs as part of their broader work—for example, as part of a consultation to inform a public resource or internal initiative.

Understanding Company Structure

No two technology companies engage with civil society stakeholders in the same way. How engagement occurs can be influenced by (1) the type, size, and organizational structure of a company and (2) the overall capacity and resourcing for stakeholder engagement.

Type of Company

The ways in which technology companies can benefit as well as adversely impact people and society and the scale of the potential for harm depends on the type of company and its place within the broader technology ecosystem. For example, the impacts of a social media platform are different than those of telecommunications companies (telcos), which are different from those of a software-as-a-service (SaaS) company. The Across the Stack tool from BSR and the GNI provides a resource for exploring this.

Not all CSOs are priorities for all companies. Factors they may increase the prioritization of a given CSO for engagement are both logical and political or reputational and include: the nature and scope of risks, the breadth and decision-making influence the CSO has in its company contacts, and the influence the CSO has among key stakeholder groups and on the broader public narrative.

The nature and scope of risks directly impact what kinds of stakeholders are relevant for companies to engage and how often. For example, the nature of user-generated content on social media platforms can make nearly any topic in the world a relevant issue for stakeholder engagement. This is different than with other types of technology companies, and social media platforms thus benefit from more regular engagement with civil society on a wide variety of topics. Software and hardware companies, on the other hand, tend to have more static risks associated with the development and use of their products and services by enterprise and government customers, so they may not need to engage with such a large and diverse mix of stakeholders nor engage as frequently.

Size

The size of a company significantly impacts the resources available for stakeholder engagement, including what teams or roles are involved and how often engagement occurs. According to the OECD, a company that employs more than 250 people is considered large. While nearly all the tech companies that CSOs will engage with are large by this definition, there is significant variation. For example, as of 2023, X (formerly Twitter) had around 1,000 employees, Reddit around 2,000, Telenor around 16,000, Meta around 67,000, Cisco around 85,000, Google around 180,000, Microsoft around 220,000, and Amazon around 1.5 million.

Larger technology companies typically have significantly more resources—both financial and human—devoted to stakeholder engagement and are therefore able to handle a larger and more regular volume of engagement than smaller companies. Larger companies also often have more staff from different teams or roles who are empowered and equipped to engage and maintain ongoing relationships. Smaller companies, on the other hand, may only have a few staff and therefore tend to only maintain ongoing relationships with a small group of CSO stakeholders, often as part of an external advisory council (see, for example, Twitch’s Safety Advisory Council), and otherwise

pursue one-off engagement when new issues arise. In addition, larger companies often have more oversight and bureaucracy related to stakeholder engagement, which can lead to slower responses. Smaller companies, on the other hand, may have more freedom to engage with and form relationships with new CSO stakeholders and therefore have a higher likelihood of engaging senior decision-makers and achieving the desired influence quickly.

Organizational Structure

A company's own organizational structure also impacts how they engage with stakeholders. Companies with distributed, horizontal, or function-based structures often engage across a broader range of roles (e.g., trust and safety, philanthropy/partnerships, human rights, and responsible AI teams all independently lead their own engagement), and engagement is often more diffuse and less coordinated. In these cases, CSOs can find themselves fielding outreach for several different contacts at a company at any given time. Conversely, companies that have centralized, vertical, or integrated structures often conduct more centralized engagement overseen by a core team (e.g., human rights), although this team may not be directly involved in decision-making on the issue at hand. Companies that are organized according to markets, such as telcos, often conduct engagement at both the headquarters (HQ) and market levels.

Understanding the overall type, structure, and culture of a company is more helpful than knowing the details. Most companies do not have publicly available organizational charts, and in fast-moving parts of the industry these are constantly in flux. To understand how a company is organized and what that means for how it engages with civil society stakeholders, the best approach is to ask company contacts how the company is structured and where their teams sit and then cross-reference information with other civil society stakeholders.

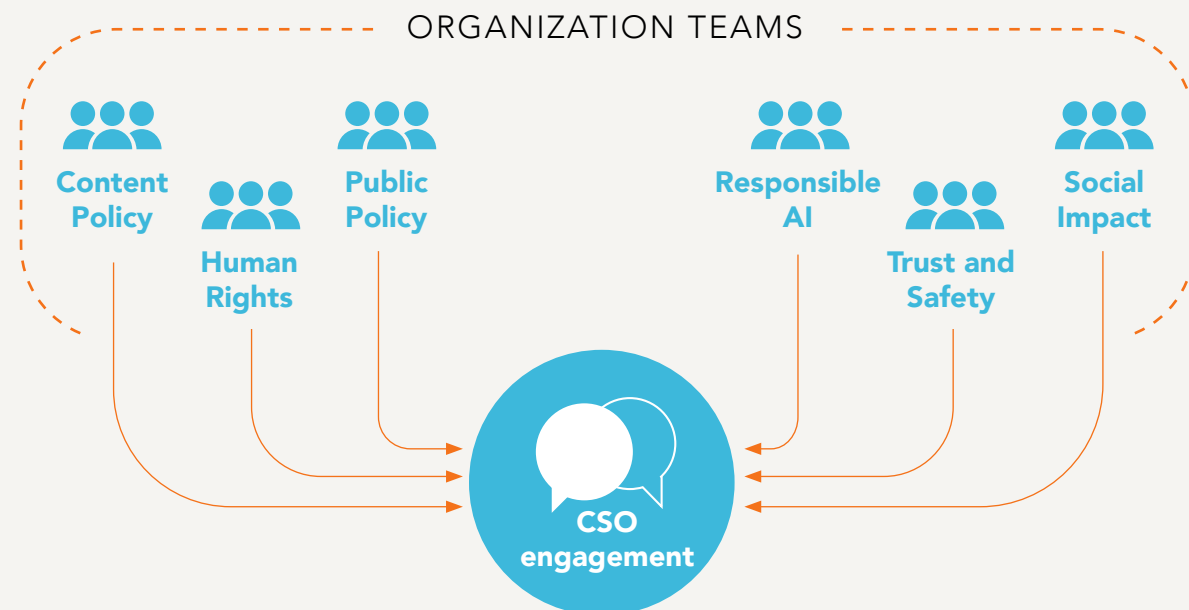


Example Stakeholder Engagement Structures

The diagrams below show common civil society engagement structures of different types of companies. Note that these are illustrative—not all companies are structured this way.

Large Online Platform

This large online platform is horizontally structured and takes a distributed approach to stakeholder engagement across functional teams who engage on the issues relevant to them. Engagement is not centrally coordinated or managed across the company, and different teams may approach it differently.



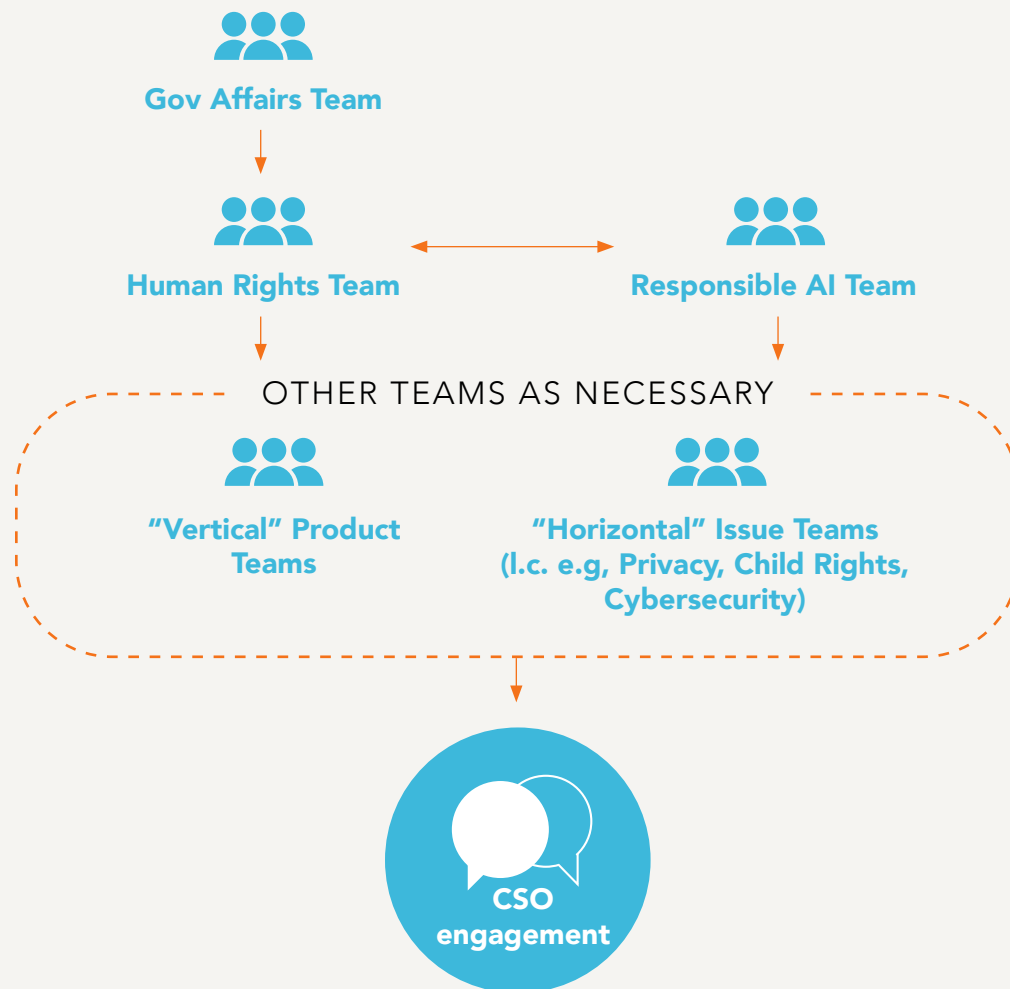
Small Online Platform

Small online platforms often lack human rights teams or other centralized teams charged with overseeing engagement. Therefore engagement with civil society stakeholders is frequently coordinated and lead by designated individuals on the trust and safety team who bring in other colleagues as relevant. In this example, the company also has an external advisory council with CSO members that it consults with on an ongoing basis.



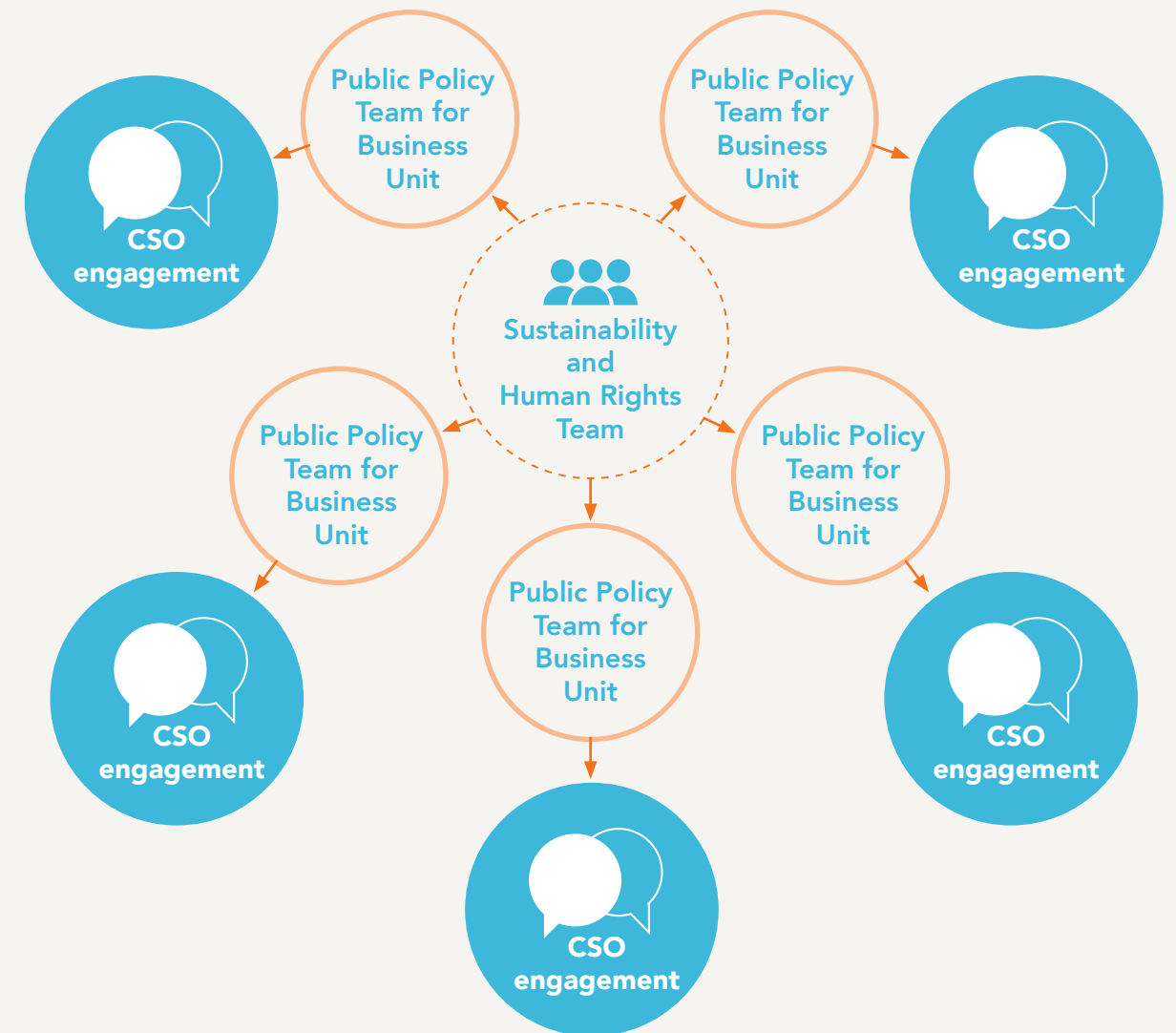
Large Company with Vertically Managed Products

In this example of a large company that is vertically structured, CSO engagement is largely overseen by a central human rights team, which is part of a broader government affairs team. The human rights team serves as the primary point of contact for civil society and other teams are sometimes brought in to engage as relevant. It also coordinates with the centralized responsible AI team, which also engages with civil society.



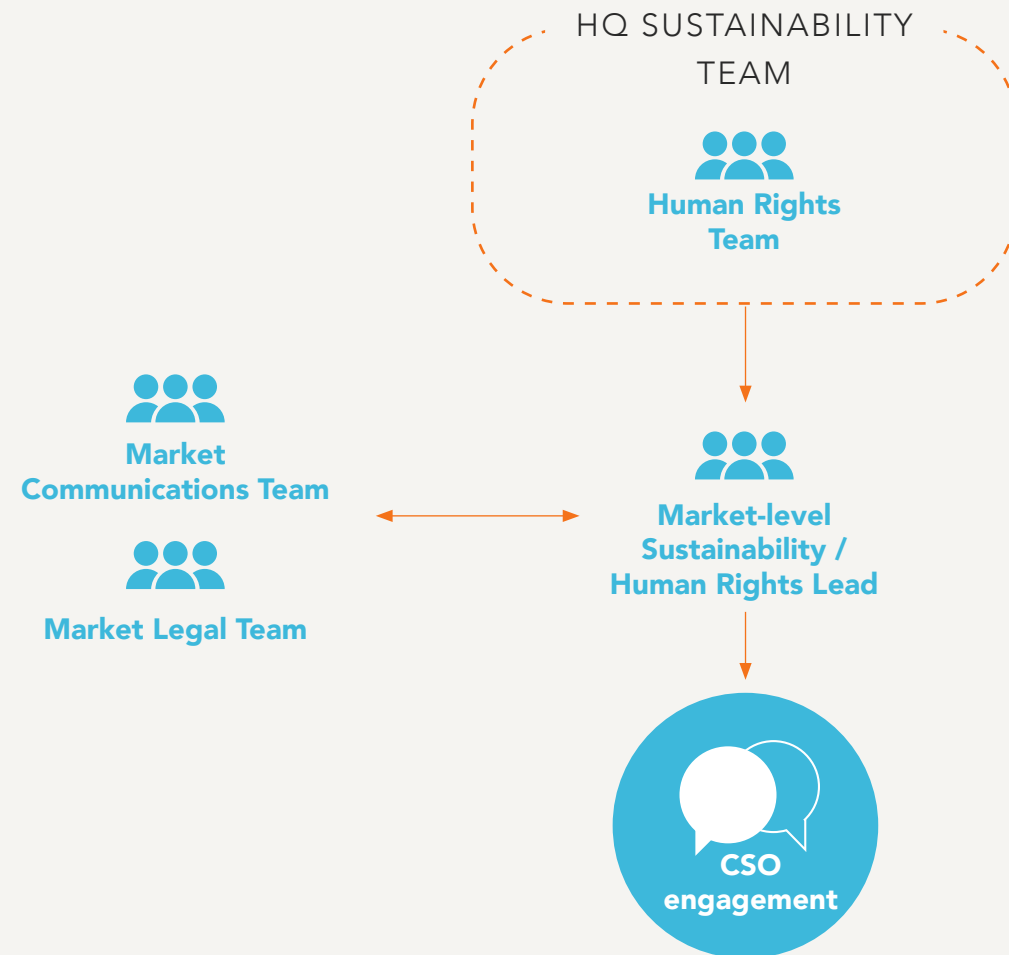
Large Company with Vertical Business Units

In this example company, engagement is conducted using a hub-and-spoke model. Engagement is primarily conducted by designated leads on the public policy teams for each business unit, with a centralized sustainability and human rights team providing support and conducting engagement on cross-company issues.



Telecommunications Companies

Telcos tend to take a centralized approach to stakeholder engagement, where the global sustainability or human rights team oversees and sometime leads CSO relationships and engagements, with participation from market-level teams. There may also be market-level sustainability or human rights leads who manage relationships with CSOs in their markets. Other market-level functions may be involved depending on the topic of engagement.



Hardware Company

Hardware companies often have simple centralized engagement structures. CSO engagement is typically overseen and conducted by a central human rights or sustainability team. They may then bring in other teams as relevant, such as market teams or issue teams.



The State of Stakeholder Engagement

Technology company engagement with civil society stakeholders has evolved significantly over the past decade, growing in frequency and sophistication along with the scope of tech-related harms and the increase in the number and expertise of CSOs focused on these issues. However, as both the need and demand for stakeholder engagement has grown, significant challenges and structural barriers have arisen, and regulatory requirements are likely to lead to continued growth and change. Stakeholder engagement in the future is likely to look different in many ways than it does today.

Where It's At

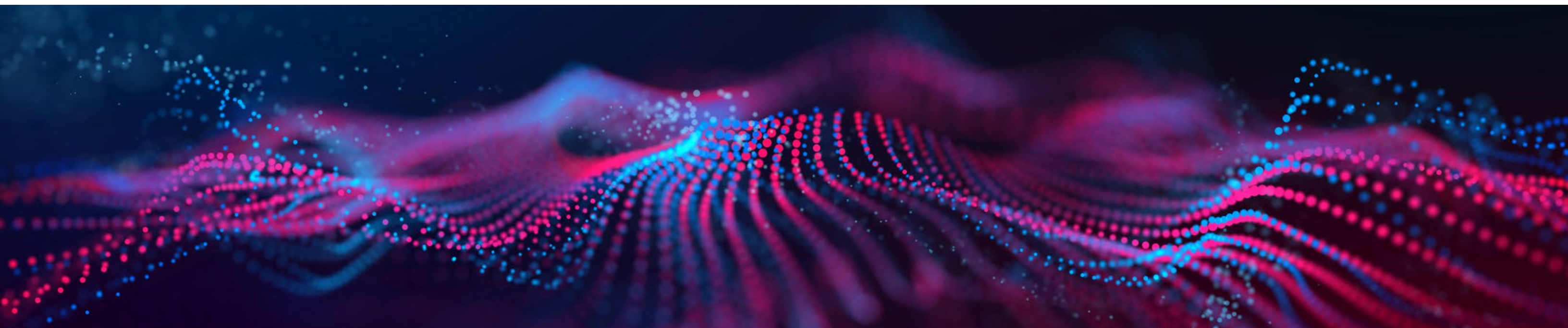
- **Expected of all technology companies:** Stakeholder engagement has become a baseline expectation of all companies, pushed by civil society, investors, and policymakers, and required by international standards (e.g., the UNGPs and the OECD Guidelines).
- **Wide variety of practices and approaches across companies:** Stakeholder engagement has largely been an iterative and informal experience that looks very different at different companies due to the size, structure, and type of company and the resources devoted to engagement.
- **Noticeable improvement, yet a lot of work still to do:** Stakeholder engagement is much more extensive and meaningful today than it has been in the past, but there is still room for significant improvement.
- **Ad hoc and inconsistent:** Engagement by most technology companies has been ad hoc in response to issues as they arise or pressure from specific groups. Few companies engage proactively, consistently, and strategically.

- **Engagement fatigue:** With the growth of stakeholder engagement needs and demands, some CSOs find themselves receiving more requests to engage than they can handle and are disillusioned with the lack of response or impact. Similarly, the teams within companies empowered to engage with civil society are often under-resourced and can be exhausted by the volume of engagement demand.
- **Focus on geographic risks and content issues:** Stakeholder engagement by technology companies has largely focused on market risks (risks associated with geographically defined markets for the company, which could be regional, country-specific, or subregional) and content issues. There has been much less engagement on other topics such as product development or sales due diligence.
- **More engagement in certain countries and regions than others:** Certain countries and regions tend to receive disproportionate attention from global technology companies based on factors including market size / business relevance, severity of risk to people, legal or regulatory risk, language capabilities and resourcing of staff, and public profile / media attention. Although international human rights standards expect companies to focus engagement on locations where risks are most severe, this may not happen unless one of the above factors is also present. Where this prioritization does occur, CSOs from countries and regions presenting less severe risk may have fewer opportunities to engage.

Where It's Going

- **Formalization and documentation for regulatory compliance:** Increasingly, companies are expected to engage with affected stakeholders to achieve regulatory compliance (see, for example, Recital 90 of the DSA). As a result, companies are likely to formalize and better document their stakeholder engagement processes. This presents an opportunity for stakeholder engagement to become more relevant, but it also poses a risk that space for informal and off-the-record conversations is closed and that dialogue becomes constrained by companies seeking to mitigate legal risk.

- **Increased involvement of legal, compliance, and trust and safety teams:** Another result of regulated stakeholder engagement is that different functions (notably, legal and compliance and trust and safety teams) are becoming involved in stakeholder engagement that were not always involved in the past. This may also lead to engagement becoming more formal and less organic and may reduce the ability of companies to engage in informal dialogue. It may also result in more information being designated as legally privileged and not able to be shared during CSO engagements.
- **Wide adoption of external advisory councils:** Smaller companies have already created external advisory councils to enable them to conduct ongoing engagement in a sustainable way. Larger companies are also beginning to take this approach, finding that by building trust and company-specific expertise among a select group of stakeholders, they can go to them with sensitive and/or technical questions that require significant background knowledge. However, participation in these councils is quite exclusive—rarely are small and lesser-known local or grassroots organizations invited to participate.
- **More multi company group engagements:** Many technology companies face common risks and engage with CSO stakeholders on similar topics, and given increasing engagement fatigue we may see more companies engage a group of CSOs together on common issues. This could occur as part of intentional convenings or as part of existing trusted multi stakeholder spaces, such as the GNI.
- **More engagement on products:** With the growth of human rights and responsible AI teams inside companies who are building out internal product risk assessment processes, as well as regulation mandating companies carry out HRDD across their business, we are likely to see more external stakeholder engagement to inform the development and deployment of products and services.
- **Increased engagement with investors:** The past few years have seen an increasing acknowledgement by institutional investors, and more recently venture capitalists (VCs), of their role in ensuring that the companies they invest in are operating responsibly. As investors begin to carry out human right due diligence themselves, they are increasingly engaging with CSOs to understand their perspectives and concerns and the impacts their portfolio companies have on people and society.



3

Achieving Effective Engagement

This section identifies and describes common characteristics of effective civil society-company engagement and discusses the barriers to achieving it.

IN THIS SECTION

» [Characteristics of Effective Engagement](#)

» [Barriers to Achieving Effective Engagement](#)

As defined in the key terms section above, **effective engagement occurs when both the company and the CSOs involved in a given engagement or series of engagements feel satisfied with how it was carried out and what was achieved.**

Effective engagement is inherently meaningful—and thus the characteristics of effective engagement below also reflect principles for meaningful engagement—but also achieves desirable outcomes for both sides. To achieve effective engagement, it's important to define what success looks like for each organization and engagement. While not all approaches need be the same, this section provides a helpful framework CSOs can utilize to figure out what effective engagement looks like for them by exploring the key characteristics of effective engagement, as well as the barriers to achieving effective engagements.

Characteristics of Effective Engagement

BSR has identified the following as the key characteristics of engagements that are effective. These are drawn from widespread consultations with both company and civil society representatives who are experienced in stakeholder engagement in the technology sector, as well as BSR's own insights conducting stakeholder engagement as part of human rights due diligence and similar processes. While not every effective engagement will exhibit these characteristics, they are something to aim for and require intentional action by both companies and civil society to achieve.

The scope and goals are clear.

1

Everyone involved should have a clear understanding of the scope of the engagement and the goals both sides are hoping to achieve. There may be prep material shared ahead of time when relevant to help build this mutual understanding. There should also be clarity about the ground rules and parameters for discussion, as well as any constraints or barriers the company may have, such as what information it is or is not allowed to share, and any regulatory, legal, or technical issues.

2

There is a mutual understanding of the people and the process.

Everyone involved in the engagement should have a mutual understanding of who is in the room, including their roles, expertise, capacity, and limitations, the history of engagement, and the roles and level of involvement expected on each side.

3

Discussion is respectful and in good faith.

Discussions should be mutually respectful and free of antagonistic approaches. Ground rules and parameters should be respected. The focus should be on discussing company practices, not disparaging the individuals participating in the engagement. CSOs should recognize that companies are not monoliths, and the people leading engagement with CSOs are internal allies with similar goals and backgrounds. Conversely, companies should understand the role of civil society and be comfortable with criticism.

4

Both sides learn from each other.

Both company representatives and CSOs have relevant knowledge and expertise to bring to the discussion and should learn from each other. Not everyone can be experts on everything, and specialists inside both CSOs and companies have a lot to share that their counterparts may not be familiar with. Both sides should seek to learn from each other to better understand how the other thinks and operates and how that contributes to their point of view on a given issue.

5

It is focused and applied.

While wide-ranging discussions can still be useful and important for relationship building, the most effective engagements with technology companies are typically focused on specific questions, issues, products, or features and include discussion of proposed solutions. They also stay on topic, even if the CSO has other engagement goals with the company. While it can be tempting to raise other priority issues when a company representative is listening, the people in the room for one issue may not have knowledge or influence over the other issues, particularly at large companies where roles tend to be more clearly bound.

6

The right format is used.

Effective engagements should use appropriate formats for the goals and issue at hand. For example, some CSOs may not feel comfortable being candid about certain topics in a group setting, making one-on-one engagement the better option. Similarly, using product demos or table-top exercises when relevant can enable stakeholders to better provide detailed feedback that is helpful to companies. It's also important to have experienced facilitators leading group engagements or engagements involving a variety of company participants. Facilitators are important for translating between civil society and tech company participants to ensure mutual understanding, as well as to address any tensions or conflicts that may arise.

7

It is appropriately inclusive.

The right company representatives should be in the room to discuss the topic at hand, not just those gatekeepers with public-facing roles. While these people may have experience in engaging respectfully with CSOs, they may not have all the answers CSOs desire. Other roles that might be relevant to include are product managers, engineers, UX researchers, data scientists, trust and safety practitioners, policy leads, market leads, and subject matter experts. Group engagements should involve a broad range of CSOs with relevant expertise and perspectives on the topic, be appropriately diverse (e.g., geographic diversity when relevant, not only involving large, influential organizations) and account for the different starting knowledge levels of different organizations.

8

It is timely.

Engagement should be conducted in a timely manner to ensure that the perspectives of stakeholders can inform the outcome of business decisions that might affect them or provide insight on critical events (e.g., at relevant points in a product or project lifecycle, prior to potential political shifts, at regular intervals during crisis periods).

9

There are feedback loops.

When engaging on specific topics, companies should follow up with stakeholders to inform them of the outcome of the engagement. CSOs should feel free to ask for this up front, and follow up themselves if needed. This can require a shift in mindset for staff at technology companies who may see the engagement as the end in itself and move onto the next thing quickly. Processes for identifying outcomes of an engagement and following up often must be created.

10

It is sustained over time.

Although one-off engagements may be necessary, the most effective engagements between technology companies and CSOs are sustained over time. This allows time to build mutual trust and for companies to understand the CSO's experiences and point of view. It also gives CSOs a chance to gain helpful insight into how the company operates and how to make specific and helpful recommendations that will resonate.

Barriers to Achieving Effective Engagement

There are many barriers to achieving effective engagement, which have been widely discussed and documented by both companies and CSOs. While many of these can be overcome (including by utilizing some of the tips and best practices explored below), they are systemic issues that require continued, concerted effort.

→ Volume and fatigue

Most global technology companies have a huge number of relevant issues and organizations they could engage with and limited allocated resources. They therefore have to constantly prioritize (often based on business and risk factors described previously), which can result in things falling through the cracks and excessive gatekeeping.

Although sustained and long-term engagement is most effective, not all CSOs have the necessary capacity to achieve this goal and many companies don't have the bandwidth to manage long-term relationships with all the CSOs that desire one.

CSOs regularly express desire to engage with more companies on more topics, while simultaneously feeling fatigue themselves. They may only have funding to work on an issue for a limited period of time, limiting their ability to build capacity. They may also lack the funding or resources to engage with companies at all, making even beginning to engage a challenge.

Although sustained and long-term engagement is most effective, not all CSOs have the necessary capacity to achieve this goal and many companies don't have the bandwidth to manage long-term relationships with all the CSOs that desire one.

→ Power dynamics and extractiveness

There is often an inherent power asymmetry between CSOs and companies, where a company's greater resources and access to expertise and insight can lead to inequitable dialogue. Companies generally decide the what, where, when, and how of engagement, and when CSOs try to reach out or lead engagement themselves, companies may not respond, show up, or send the right representatives. This dynamic can lead to engagement feeling extractive for civil society, where they regularly provide companies with information and insight and don't receive anything in return.

→ Compensation for engagement

CSOs often feel they provide free consulting to companies, with companies regularly extracting unpaid labor from often under-resourced and overworked organizations. However, many also feel that accepting compensation from companies for engaging would compromise their independence. This issue is exacerbated by the fact that funding for CSO engagement with companies has historically been insufficient. For CSOs that choose to take company funding, there is sometimes a fear that saying the wrong thing could result in funding being pulled or not renewed in the future. This can result in self-censorship for the sake of meeting funding requirements.

Companies and CSOs often use different terminology and fail to understand each other even when there is clearly common ground.

→ Speaking the same language

Companies and CSOs often use different terminology and fail to understand each other even when there is clearly common ground. CSOs often speak the language of human rights or social justice, whereas technology companies speak in the language of business, engineering, product, or trust and safety. CSOs and companies also often have different mental models for solving problems. CSOs often approach problems from the top down—utilizing high-level principles to define and argue for certain actions related to a problem they have identified. This can clash with companies' tendency to think short term and from the bottom up, identifying problems to be solved as they arrive and looking for a solution.

→ Company complexity

Large technology companies can be organizationally complex and difficult for external stakeholders to understand. Organizational charts are generally not public, and the structure can change regularly, leaving CSOs guessing about who to contact, who to request to participate in engagements on what issues, and where decision-making power lies. It can even be challenging for company stakeholders to understand, particularly in large companies.

→ Lack of company comfort with criticism

If company representatives do not have a background in civil society or experience with engagement, they are often fearful and uncomfortable with criticism and do not understand that the role of civil society is often to criticize as part of advocacy. It takes time and exposure to engagement—along with guidance from experienced colleagues—to build that comfort, and early engagements can be poorly handled.

→ HQ vs. regional dynamics

It can be challenging for CSOs to understand and navigate the dynamics between headquarters and regional staff when companies have a strong regional presence. There can be an imbalance of resourcing on engagement between the two, lack of organizational oversight of engagement by HQ, and tensions or risks at the regional or local level. For example, local public policy leads may be sympathetic to or previously worked for repressive local governments, and some companies may even be required by law to hire government employees. Furthermore, not all technology companies have regional staff who can engage with local stakeholders, which risks reinforcing Western-centric echo chambers and constraining opportunities for civil society in the global majority to engage.

→ High turnover

There is high employee turnover within many technology companies and CSOs. This can make maintaining relationships challenging and lead to regular loss of institutional knowledge. Companies and CSOs sometimes need to regularly rebuild relationships from scratch, and opportunities for engagement can disappear quickly and unexpectedly due to turnover.

→ Non-Disclosure Agreements

Some companies require or request CSOs to sign NDAs to participate in an engagement, particularly when related to a product launch or on a topic with legal risk. Seeking to protect intellectual property and sensitive commercial information is a legitimate business interest, and NDAs applying to all parties can create space for more information sharing and candid dialogue. However, NDAs can be overbroad and limit the ability of CSOs to do their work by preventing them from sharing insights with colleagues or from publicly advocating on similar issues. Some CSOs therefore have a policy of refusing to sign NDAs.

→ Increased legal risk

Technology companies are facing increasing legal and regulatory risks that are leading to constraints on their ability to engage frankly and openly with CSOs. According to one company stakeholder, “legal risk trumps all else internally.” Engagement with civil society is increasingly seen as creating rather than helping mitigate risks. This can prevent companies from sharing information before engagement to help CSOs prepare, and can also mean that they are not allowed to present or share sufficiently detailed information. Companies increasingly face internal pushback on engaging with CSOs that carry out highly critical public advocacy campaigns, and are also typically not allowed by their legal teams to engage with any CSO involved in active litigation against the company.

Technology companies are facing increasing legal and regulatory risks that are leading to constraints on their ability to engage frankly and openly with CSOs.

→ Antitrust risk

There is an antitrust risk for any companies seeking to come together to share information and collaborate. While this risk can and has been overcome in the past, growing antitrust action by regulators on company collaboration for positive ends is also having a chilling effect, and it can slow down or impede multi stakeholder engagement involving a group of companies and civil society.

→ Increasingly specific and technical needs

Companies that have been engaging with civil society for many years have largely identified their obvious problems. Increasingly, helpful engagement for companies is highly specific (e.g., the contours of a certain content policy) or technical (e.g., development of an AI product), and thus requires significant expertise from civil society to provide meaningful and impactful input. However, not all CSOs can be experts on every topic, and it takes time and resources to develop and maintain expertise on such a fast-moving industry. Additionally, many companies do not recognize the value of lived experience or the expertise of CSOs that can be critical for understanding a given issue (e.g., immigrant rights groups can provide helpful insight on the use of technology at the border, even if they may not be experts on the technology itself).

→ Creating reliable communication channels

Many forms of engagement between CSOs and technology companies rely on personal relationships and simply sending emails. This approach is often too fragmented for situations that require regular, ongoing communication, such as in the case of sharing on-the-ground intel to a company and receiving responses back. Trusted flagger channels can be more formalized, but there are often still a wide variety of company contacts, and information sharing and follow-up can be inconsistent.

→ Need for more CSO coordination

There has been significant growth in the number and capacity of CSOs around the world focused on engaging with technology companies on the impacts of their products and services. However, with this boom has come fragmentation, competition for funding, and a variety of legitimately different political and ideological perspectives on the issues. This has led to a lack of coordination among CSOs that are advocating on similar issues—whether intentionally, in order to maintain an advantageous position to attract funding, or unintentionally due to lack of awareness—which can result in CSOs undermining each other.

→ Reputational concerns

Sometimes CSOs are concerned that directly engaging with companies could tarnish their image or status among their peers—making them seem too friendly with companies or even compromised. They may therefore reject any form of direct engagement with technology companies, even if it may be helpful to achieving their objectives and they have valuable information and perspectives to share. There is also sometimes a lack of trust among CSOs, which can make people uncomfortable speaking up in group settings for fear of how they will be perceived by their peers.

→ Geographic-specific challenges

Some geographies have specific challenges for achieving meaningful engagement with global technology companies, such as security risks for both CSOs and company staff, constrained operating environments for civil society, or the presence of authoritarian government allies in company positions. In some places there may also be complicated relationship dynamics among CSOs that companies are at risk of exacerbating.

4

Practical Tips and Best Practices

The following is a list of practical tips and best practices for effectively engaging with technology companies.

IN THIS SECTION

- » [Strategy](#)
- » [Preparation](#)
- » [Tactics and Approach](#)

Below is a list of practical tips and best practices for effectively engaging with technology companies. Although these tips are aimed at CSOs, it's important to acknowledge that companies must also do their part to understand CSO stakeholders and meet them on their terms. They should therefore consider their role in achieving effective engagement, including related to the tips and best practices below. Further exploration of the roles and responsibilities of companies can be found in the resources section.

These tips and best practices have been sourced from BSR's consultations with civil society and company stakeholders, as well as BSR's own experience, representing collective wisdom across the responsible technology field. Ultimately, the way CSOs choose to engage with companies should reflect the mission and goals of the organization. Not all engagements should look the same, and not all these tips will resonate or be relevant for everyone.

Strategy

→ Be targeted in outreach when initiating engagement.

While in many cases the company initiates engagement, CSOs can also get in touch with company representatives to request engagement, whether it's an informal or introductory call to establish a relationship and identify further opportunities to engage, or to invite them to participate in a more structured engagement. When reaching out to a company, it is important to identify the "right" person to speak to—what role is likely to cover the issue you are interested in? Emailing an executive like a VP or the general counsel is not the best approach. Stakeholders at this high a level are not subject matter experts and do not lead engagement with CSOs, although they may sometimes participate when relevant.

The size and complexity of companies can make it challenging for CSOs to identify and get in contact with the right person inside a company if they do not already have contacts. There are several tactics that can help. Look at the common teams or roles listed above as often involved in stakeholder engagement and use web searches, company blogs or reports, and LinkedIn to see if those roles exist and who is involved. If a company has a human rights team, they are often a good first point of contact for triaging requests and can often loop in the relevant people. It is also helpful to consult with other CSO peers to gather insight about who to get in touch with and how.

→ Identify the goal of the engagement and choose the best approach to achieve it.

As one stakeholder put it, "decide whether you are trying to make a point—such as naming and shaming and raising public or policymaker awareness—or trying to make a difference inside a company." Direct change inside companies can eventually be achieved via public advocacy campaigns, but if the goal is to see specific changes to products and policies, trying direct engagement first is

Direct change inside companies can eventually be achieved via public advocacy campaigns, but if the goal is to see specific changes to products and policies, trying direct engagement first is usually more effective.

usually more effective. It's also important to consider the trade-offs associated with pursuing litigation against a company. While there may be legitimate reasons for litigation, CSOs should be aware of how it may impact engagement with the company. Companies are generally not allowed by their legal teams to engage with organizations that have threatened or are involved in litigation on any issue, and because litigation is seen as highly confrontational it can have a long-term impact on the likelihood that the company will engage with the CSO in the future.

→ **Work strategically with other CSOs.**

Working with other CSOs increases the likelihood of achieving everyone's goals. It allows organizations to leverage each other's expertise and approach, helping address capacity gaps and scarce resources, and makes a much stronger case to companies than if a single CSO engages alone. Coalitions are especially helpful when the goals are to simultaneously make a point and make a difference inside a company.

Identify which organizations are best suited to play which roles. Some may be better positioned to lead public advocacy, while others may be more successful at direct engagement with companies behind the scenes. Even if a CSO is not part of an organized coalition, peers can still be helpful resources. They may be able to make introductions to company contacts or have helpful insights to share.

→ **Try to engage with the company prior to taking public action.**

Reach out to relevant company contacts and try to have a conversation prior to sending a public letter or launching an advocacy campaign. This builds goodwill inside the company and can open avenues for productive conversation. It also gives allies within the company an additional opportunity and point of leverage to advocate internally. Even if it may seem necessary to accomplish an advocacy goal, not reaching out with a heads-up prior to taking public action can be seen as a betrayal by company contacts and make future engagement more challenging.

→ **Public campaigns and private engagement are possible in combination under certain conditions.**

Although it can be challenging, many CSOs are able to conduct public advocacy campaigns while simultaneously engaging with the company on the issue in private. For this strategy to work, it's best to first approach the company and try to resolve the issue via direct engagement before moving onto public advocacy. If the company is aware of the problem and has already identified a potential solution but has decided not to implement it, targeted public pressure can help convince previously skeptical company decision-makers to take action.

When pursuing a dual approach, messaging in the public campaign should generally avoid "this company is evil" framing. The company may simply dismiss the campaign out of hand and presume it will not be fruitful to engage. Public advocacy is also more effective if the messaging and recommendations supports the agenda of internal allies inside the company, which they can then leverage. It's also helpful to have a good relationship with key company stakeholders so that they are more understanding and tolerant of a public campaign.

When engaging companies privately as a part of the campaign, it's important to do so genuinely and with an understanding of the nuances and speed of development of the issue at hand. Be aware that with increased legal risk for companies, the space for a successful dual approach is swiftly closing, particularly for companies that are more frequent targets of legal action and political attention.

→ **Use letters intentionally.**

Both public and private letters do not work equally well for all companies. They are typically most effective as part of a broader advocacy campaign when the CSO is not expecting a response. They do help raise internal awareness or attention on an issue and can help generate buy-in to take action, particularly when the letter shows good preparation by referencing a company's commitments and what they have said publicly on the issue.

For companies that are the frequent targets of public criticism, responding to letters comes with significant legal risk and requires time and many levels of clearance. Therefore, it's important to be strategic about using letters with these companies and to be highly targeted. An extensive list of asks for action and information and tight deadlines for response can require a significant amount of people to review and sign-off, and therefore many companies simply won't respond. There is also a risk that responding to letters may take a company's attention away from other pressing or emerging human rights issues and result in other priorities being neglected altogether.

→ Build expertise strategically and focus engagement there.

CSOs cannot all be experts on every issue for every part of the technology industry. Choose focus areas as an organization and engage with relevant companies only on those issues. Only expand to new areas if the organization has the capacity to take them on. In choosing focus areas, it can be helpful to think of the organization's role, expertise, and lived experience expertise relative to peer CSOs. What is the value add? Are there gaps to fill? How can the organization complement rather than duplicate existing efforts?

→ Identify internal allies and invest in relationships with them.

There will always be internal allies at companies who have similar values and goals. They can often be found on human rights, trust and safety, responsible AI, and government affairs or public policy teams. Although they often do not have direct decision-making power on big issues, they work behind the scenes to raise awareness and gather support for change. They are also the subject matter experts executives turn to for advice.

Although [internal allies] often do not have direct decision-making power on big issues, they work behind the scenes to raise awareness and gather support for change. They are also the subject matter experts executives turn to for advice.

Target these people for engagement and invest in building relationships with them over the long term. Some of the most impactful engagements can happen simply from sending an email to a trusted contact. However, to get to that point relationships need to be built over time. Ask internal allies to speak on panels, check in with them at conferences and events, schedule informal catch-ups, and socialize at receptions. Find reasons to reach out regularly by sharing information and updates, such as new reports, blogs, etc. Collaborating on mutually beneficial issues (e.g., joint public policy advocacy) is also a helpful way to build trust. CSOs and companies don't need to agree on everything to work together.

Internal allies often advocate for CSO goals internally but are not able to share that information, so regularly sharing feedback can help support their arguments. As one civil society stakeholder said:

The majority of the issues that civil society wants dealt with are things that the company is likely already aware of, has likely researched internally, and has an identified solution that has been rejected by management on business grounds. A key goal of engagement from the CSO side should therefore be winning over internal advocates and providing them with the information and

winning arguments they need to convince leadership to change course or invest resources. When CSOs can tap into those internal company debates and help add pressure or shift the needle, that's effective advocacy.

→ Choose when decision-making power does or does not matter.

There is a perception that business decisions are only made at the executive and board level of companies, but many of the decisions that civil society cares about are made at the working level inside technology companies. Working level staff are most likely to be internal allies and are valuable to engage with because they are subject matter experts who can get into the nuances of a problem and are trusted by executives to make informed recommendations. In companies that are highly organized around geographic markets, CSOs can engage with both HQ and local staff to get more attention on an issue and leverage their hierarchical dynamics. Ultimately, each organization will need to assess the issue at hand and their time and resources constraints to decide whether decision-making power matters.

→ Establish and maintain institutional relationships.

Given the often high turnover at both technology companies and CSOs, it's important to establish multiple relationships with a company with multiple people in a given organization. This way, company contacts can stay in touch with the CSO and the CSO never loses all contact with a company if key contacts leave. There's also frequent movement of staff across technology companies, and maintaining relationships allows a CSO to follow them.

Invite colleagues to engagements with companies when possible and debrief regularly to share knowledge and ensure everyone is up to date on the state of engagement. Formally transitioning a company relationship to a colleague before someone leaves can ensure institutional relationships stay consistent, and using a database to manage company contacts can ensure that information is not lost in an inbox.

Although the diffuse, incoherent, and sporadic nature of stakeholder engagement at some technology companies is often frustrating, it also comes with the opportunity to seed a CSO's views across different parts of the company.

→ Take advantage of dispersed engagement.

Although the diffuse, incoherent, and sporadic nature of stakeholder engagement at some technology companies is often frustrating, it also comes with the opportunity to seed a CSO's views across different parts of the company. Horizontally structured companies tend to operate via a consensus model, so sharing views and asks with multiple people on multiple teams increases the likelihood they are heard and adopted. However, it is important to communicate about, coordinate, and prioritize dispersed engagement internally. In some cases, multiple people at a CSO may find themselves fielding outreach from several different people at a company at the same time, making appropriate use of time and resources key.

→ Work to maintain trust.

Trust is a two-way street, and while company representatives have a vital role to play in maintaining trust with CSOs, it is important for CSOs to be mindful of their role as well. First and foremost, always consider the broader organizational relationship during individual engagements. Violations of trust in one engagement

can have cascading impacts on future engagements. For example, while leaking information from a confidential stakeholder briefing to the media can be an effective strategy for raising public awareness of an issue and pressuring a company to make specific change, it can also come with long-term consequences that are important to consider. Leaks pose significant risk for internal allies and can be a dealbreaker for further engagement with the CSO, and they can also lead the company to constrain its engagement with civil society more broadly.

Always consider the broader organizational relationship during individual engagements. Violations of trust in one engagement can have cascading impacts on future engagements.

→ **Decide whether compensation is needed to engage.**

Many CSOs lack sufficient funding to engage at the frequency and level of depth desired by technology companies, however, companies are often happy to pay stakeholders for their time and effort. If they do not offer it, it is ok to ask. Many CSOs have a policy of not taking funding or any form of compensation from companies, while others regularly do so. It is wise to have a policy or approach to compensation from companies. Asking civil society peers about their approach and

rationale can be helpful in thinking through what is right for a given organization. If funding is off the table, think creatively about other ways the company could provide compensation—for example, by sharing information.

→ **Utilize media and political attention on an issue.**

Media and political attention are an indicator of opportunity. Take advantage of media cycles to help decide when to engage companies and with what approach. Issues that receive widespread media coverage or are the focus of government scrutiny have significant potential for impact because they are often escalated internally, and engagement can involve discussions with company representatives with more direct decision-making power.

→ **Engagement has a higher likelihood of success on issues a company is already investing in.**

Resources allocated for responsible technology-related work inside companies are precious, even at large companies. If the goal of your engagement requires the company to invest significant time and resources, it is more likely to be successful in areas where the company has already decided to invest, such as addressing risks in particular geographies that have been prioritized, in high-priority products and services, or in emerging regulation. Ask internal allies what is currently being prioritized internally to identify these areas.

→ **Don't ignore lesser-known companies / parts of the technology sector.**

The large online platforms and telcos receive the vast majority of attention from civil society. However, other parts of the technology sector have plenty of issues relevant to CSOs' diverse missions, and only focusing on big brands can lower an organization's impact. Look for companies elsewhere in the technology stack (see this [Across the Stack](#) for help) or with a public profile that is lower than their

impact merits. Many of these companies see little demand for engagement from civil society and sometimes may not know how to handle it, yet they would clearly benefit from improved dialogue with CSOs. CSOs should reach out to these companies if they are relevant to the issues the organization works on. Getting a foot in the door of these companies is often far easier than it is with more in-demand companies. One such stakeholder at a lower-profile company said, “We’d be thrilled to have a cold email asking for a meeting to explain what we do and how we think about our human rights risks.”

→ Acknowledge progress if it is warranted.

External acknowledgment of progress helps maintain momentum and buy-in for change inside a company. Only receiving criticism without any recognition of progress or positive action disincentivizes company executives from continuing to invest in progress because they see it as a lose-lose situation. Acknowledging progress also raises a CSO’s standing with company contacts because it shows they are not only focused on trying to critique the company or make it look bad. If you are known for being fair, the company is also more likely to respond to outreach in the first place. Acknowledgement of progress can come in whatever format is appropriate for the organization—from public acknowledgement of progress as part of a response to an issue to a brief email to a company contact that they can share with their executives. If you are uncomfortable with direct praise, you can discuss with internal allies an approach that resonates with the company but does not compromise your approach.

Preparation

→ Understand the whole technology ecosystem and the role of your target company.

The relevant human rights issues for companies and the leverage they have to address them varies considerably depending on where they sit in in the broader technology ecosystem. When engaging with new companies in parts of the technology ecosystem that are unfamiliar, do background research about their unique risks and how they intersect with other parts of the ecosystem (the [Across the Stack Tool](#) is a great starting point for this). Don’t simply repeat what has been said to other companies unless it’s relevant.

→ Think through the relevant background knowledge and expertise that will help achieve your goals.

When technology companies organize engagements they should provide CSOs with resources and relevant background knowledge to help prepare. However, this does not always happen, and it is often helpful to have a broader background on an issue than a company’s own version of events. Company representatives involved in an engagement will often be experts on the issue and expect to have a sophisticated conversation. Points that are vague and lacking in background will be discounted and can make internal stakeholders question the value of engagement. In most cases, feedback and recommendations need to be granular to resonate and be useful for companies.

For example, if a CSO is advocating for a company to change a policy, it’s important to know exactly what the policy states, what the desired changes are, and why. If a CSO is planning to contradict a company’s version of events, it’s

important to have clear examples with documentation and a compelling analytical framework. Avoid utilizing the same arguments from one company to another without ensuring they are genuinely relevant. Even competitor companies will have significant differences.

Think through the assumptions coming into the engagement and confirm them to the extent possible. Incorrect assumptions can make arguments less relevant and less likely to have an impact. Think also about the challenges that companies face (such as the massive volume of policy-violating content that large online platforms deal with) and make recommendations with those challenges in mind. Don't make recommendations that are impossible to implement because this may lower the credibility of other recommendations. For example, it is simply not possible for humans to review every single piece of potentially violating content on a large social media platform.

There is no ready-made package of information to help prepare, but there are several sources that are helpful to review, such as company blogs, reports, policies, and CSO reports. There is often a lot of detail behind company disclosures, and you can ask for a meeting to go through specific parts in more detail. Also, reference and share academic literature relevant to the topic—evidence-based claims go much further inside technology companies. Invest in learning technical details relevant to the company—e.g., how machine learning works, what performance metrics are, how internet infrastructure works, etc. This helps to understand many of the key issues in greater depth and make stronger recommendations. If a CSO wants to engage with product and engineering teams they need to be able to speak their language and have a baseline level of expertise. You can ask the company to provide a technical briefing or training to help with this.

There are several areas in which technology companies are regulated, and it's important to be aware of what the relevant laws and regulations require if they are relevant for an engagement.

Understand legal and regulatory constraints.

There are several areas in which technology companies are regulated, and it's important to be aware of what the relevant laws and regulations require if they are relevant for an engagement. For example, anything involving data will be subject to privacy and data protection laws, telcos have licensing constraints that often legally bind what they can do to address risks, and collaboration between companies comes with antitrust risks that have to be assessed.

Technology companies are increasingly constrained by laws and regulations that are at odds with international human rights standards. While companies still have a responsibility under the UNGPs to take steps to uphold international human rights standards to the maximum extent possible, local laws apply and can rarely be ignored, particularly if the company has local staff in-country who are vulnerable to hostage-taking by unfriendly governments. When engaging with a company about a particular country, it's important to understand the domestic legal context. CSOs can sometimes leverage pro bono law firms to help with this.

Finally, European policy is increasingly shaping the technology sector at a global level and is the major driver of action inside companies at the time of writing. There is a risk that companies divert attention toward EU rather than majority world concerns, so CSOs could seek to understand what these frameworks might mean for their countries and their issues and utilize them in engagement.

→ Understand the company's organizational dynamics.

As explored above, the size of a company and the way it's organized significantly impacts how it conducts engagement with civil society. To prepare for an engagement, it is helpful to understand what teams will be involved and what they do in relation to the topic. Try to find out how decision-making power works, whether the company is horizontal or hierarchical, whether decision-making is done via consensus, and whether certain teams are more amenable to the desired goals. One way to find this information is to look at company disclosures and begin to identify what teams exist and what they work on. Key word searches for these roles on LinkedIn can help identify specific people because they often are not listed on the company's website. Informal relationships with internal allies can also be highly valuable for mapping internal team dynamics.

As one company stakeholder said, "sometimes we are desperate for an external stakeholder to raise an issue or make a recommendation to strengthen our hand internally, and we can point them in the right direction."

→ Ask company contacts for guidance and information.

Company contacts can be helpful in preparing for engagements and are often happy to provide CSOs with more information. Company contacts will have a sense of what the barriers are, where buy-in is, where to push, and how. As one stakeholder said, "sometimes we are desperate for an external stakeholder to raise an issue or make a recommendation to strengthen our hand internally, and we can point them in the right direction."

Some things to ask company contacts about are: Do they have helpful disclosures they can share about specific topics? How is the company structured and what are the relevant roles and decision-making processes? What is their current perspective on a topic of interest? What kinds of recommendations would resonate or further progress inside the company? Are there any "triggers" or "red flags" for company representatives that can shut down conversation? Can they provide more detailed background about a disclosure (e.g., a policy or a report)? Can they provide a technical briefing or training to better understand how tools and products work?

→ Understand the business side and where incentives lie.

It is important for CSOs to remember that they are engaging with a business, and understanding how that business operates and what business incentives exist are important to making a successful case for change. In the technology sector, some companies follow [agile development](#) processes that move quickly and are therefore in constant change, whereas others are more static and move more slowly. Think about what kinds of asks can stick in these environments. Also be aware of the pace of change. It is generally much slower at large companies due to the distribution of decision-making power and the number of people required to approve something.

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Figure out what the business case is for recommendations and communicate that. Internal ally teams, like trust and safety and human rights, are some of the least resourced teams and regularly need to have strong business or technical arguments for their asks. Think about the incentives of different roles. For example, product teams are generally incentivized to ship products quickly and efficiently. Sales teams typically have quotas and are incentivized to sell as much as possible as quickly as possible.

Be aware of business constraints and where the business is going in the future. Even large companies do not have unlimited resources, and during times of financial slowdown they are less likely to implement recommendations that would require significantly more people or investment of resources.

Companies are often sensitive to what their peers are doing, so contrasting their performance with peers can be helpful. They also generally want to avoid bad press, so going to them with potentially damaging information privately can lead to change without needing to do a public campaign. CSOs can also build a business case behind their recommendations by explaining how they can improve the company's reputation, reduce political scrutiny, reduce legal risk, and improve compliance with emerging regulations related to corporate responsibility.

It's also important to remember that companies aren't people, and many issues arise because of systems and not individuals. Genuine malevolence and intentional bias are rare, and missteps tend to occur because of perverse business incentives, risk aversion, the challenges of doing business, such as legal risk, complying with laws and regulations, coordinating across disparate teams, and managing workflows with limited allocated resources. Most of the staff employed at technology companies, including many internal allies, see their work simply as a job rather than a higher calling or mission they would sacrifice themselves to achieve. Be wary of recommendations that could jeopardize their jobs or their safety.

→ Utilize global standards.

Most large technology companies have public commitments to adhere to global standards for responsible business conduct, especially the [UNGPs](#) and the [OECD guidelines for multinational enterprises](#). CSOs should understand these well and ground recommendations in them as much as possible. Particularly important concepts from these standards to keep in mind are:

1. All human rights are important, not just those that we most commonly associate with the technology sector such as privacy, security, free expression, or child safety.
2. Rights often are in tension with each other. Companies regularly have to make trade-offs, and these are justifiable if done in line with international human rights standards (i.e., the trade-offs do not involve absolute rights and are done in a way that is legitimate, necessary, proportionate, and non discriminatory).
3. Companies cannot always address all their risks at the same time, and so, where necessary, they will prioritize by first addressing those that are most severe, especially for vulnerable groups. Risks that CSOs identify as severe based on knowledge of how people are impacted can receive higher priority.
4. Companies cannot take on the role of governments. Think through the government duty to protect human rights vs. the corporate responsibility to respect human rights, and calibrate recommendations accordingly.

When advocating on specific human rights-related issues, it can also be helpful to reference more specific standards when relevant, such as the [Global Network Initiative Principles](#), the [Santa Clara Principles on Transparency and Accountability in Content Moderation](#), and the [Necessary and Proportionate Principles on Human Rights and Communications Surveillance](#). Arguments from relevant [UN Human Rights Council special procedures](#) can also be helpful. These are independent human rights experts with mandates to report and advise on particular human rights issues, and contribute to the authoritative development and interpretation of international human rights standards. A list of special procedures reports related to the technology sector can be found [here](#).

→ Come with consistent, specific, measurable asks.

Simply saying their approach is wrong is often less impactful with companies; more specific asks and documentation of issues have a greater chance of success. For example, when advocating with an online platform about issues certain users are facing, having screenshots and accounts from users that can be used as evidence and shared inside a company provides them with a helpful starting point to look into the issue. Attaching a clear solution or recommendation to a criticism also makes a critique more palatable and more conducive to sustained relationships over time. It is particularly helpful to include a measurement in the ask, such as “we will consider this recommendation implemented when ...”. This then justifies

Simply saying their approach is wrong is often less impactful with companies; more specific asks and documentation of issues have a greater chance of success.

future criticism of an issue if the expectations have not been met. It is also helpful if you organize asks into time-categories, which recognizes what is possible in the short-, medium-, and long-term and shows sensitivity to the potentially limited resource internal allies are working with. Strive to be consistent with asks of different companies, while ensuring they are tailored to the company. Avoiding copy-pasting exact recommendations made for other companies unless they are truly relevant.

→ The UN can be a helpful ally in engagement.

The UN has increasingly become involved in issues of corporate responsibility in the tech sector, including the [UN special procedures](#), the [Office of the High Commissioner for Human Rights](#) (especially via the [UN B-tech Project](#)), and the [UN Tech Envoy](#). UN stakeholders regularly engage with technology companies at high levels of seniority and can be particularly helpful in situations where a company is routinely non responsive to issues raised by CSOs or is playing a role in serious ongoing human rights abuses. Communication from the UN to a technology company on an issue can push them to engage with CSOs, where they hadn’t previously, and to allocate more resources to addressing an issue.

Tactics and Approach

→ Utilize relevant tactics from government engagement.

Although engaging with technology companies is not the same as engaging with governments, there are many standard aspects of advocacy with governments that also apply to technology companies. For example, it is important to understand that governments are not monolithic; you can oppose policies while still cultivating internal allies. Policies targeted for change should be analyzed in detail. It is important to know what teams or entities do what, and who to approach and how.

→ Understand the constraints of different formats.

One-on-one engagements are often more free flowing and informal, and are therefore a better format to use for back-channel communications and getting more specific, nonpublic information. Group engagements, on the other hand, are often more restricted and may require legal and comms approvals and result in formal feedback being communicated to senior leaders. Group engagements are therefore better for sharing overall thoughts and recommendations rather than expecting detailed insider information from the company. Additionally, unstructured time during formal engagements—such as a lunch hour or reception—provide good opportunities to follow up with company representatives with specific questions. You are likely to get more frank answers in casual environments.

→ Stay on topic.

Have a clear agenda with key points and stick to it. Although a CSO may have a wide variety of advocacy goals with a company or other grievances to raise, it's important to stay on the topic of the specific engagement. Other issues might involve entirely different teams and people, and raising off-topic issues can get in the way of the engagement at hand. Additionally, in many technology companies, meetings rarely extend beyond 30 minutes, so maintaining discipline on time management is key to getting your points across in a short time. Request a separate meeting to discuss other issues.

→ Be nuanced and specific with criticism.

Remember that CSOs are often engaging with internal allies who take their jobs and the complicated issues they face seriously. Nuanced and specific criticism that demonstrates time spent considering the complexities of the issues at hand is generally better received and can help internal allies push for change.

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→ Don't focus on perfection.

Not every engagement will result in a win. Achieving every single goal is highly unlikely, particularly in the most dynamic parts of the technology sector such as online platforms and consumer apps, where the technology, their role in society, and therefore the issues they face are constantly evolving. When engaging smaller companies or companies that are newer to civil society engagement, simply raising awareness of an issue internally can be a major success. Effective engagement with companies is typically a long game; don't get too caught up in the minutiae.

→ Be strategic about NDAs.

NDAs are generally not necessary for most engagements. However, they can be necessary for companies to engage with stakeholders deeply on a product, especially before it's launched, or on highly sensitive internal issues. NDAs can also

be required for long-term engagement because it comes with greater legal risk for the company. Default NDAs will generally be quite broad, so it is possible to ask for tailored and/or time-bound NDAs that are more limited in scope and do not constrain a CSO's ability to do advocacy or have open conversations with the company.

Effective engagement with companies is typically a long game; don't get too caught up in the minutiae.

→ **Adapt to the culture and language of the technology industry.**

This will look different depending on the type of company. For example, many of the newer technology companies are culturally open to learning, sharing, ideation, and creative approaches to problem-solving, whereas legacy companies can be slower moving and more traditional, and can shy away from recommendations that are outside of the norm or go beyond baseline expectations. Engaging with these companies can feel more akin to engaging with a government entity.

Culture can also differ across teams. Teams that are more accustomed to stakeholder engagement are likely to be more open to frank, free-flowing engagements and to be more comfortable with criticism, whereas less experienced teams may be more conflict avoidant and formal. CSOs should assess the culture of the company and the team they are working with and adapt their approach accordingly.

Human rights, social justice, and policy terminology may be inaccessible to company representatives who don't work directly in those areas, so you should try to adopt their terminology to the extent possible, while at the same time increasing company understanding of core concepts.

It's also helpful to speak the language of the people you are engaging with. Although teams such as product or research may be less experienced in engaging with civil society, they are often highly receptive to learning. However, human rights, social justice, and policy terminology may be inaccessible to company representatives who don't work directly in those areas, so you should try to adopt their terminology to the extent possible, while at the same time increasing company understanding of core concepts. For example, at online platforms trust and safety language is often more widely understood and is reflected in a company's policies. Reading company policies and disclosures (such as policies, blog posts, and reports) is a helpful way to learn how they discuss issues.

→ **Communicate your value to new contacts.**

Particularly for smaller companies or people in roles that do not typically do much stakeholder engagement and may not see its moral and business value, it's important for CSOs to communicate why and how engaging with them is helpful.

For example, an organization may have the ability to provide intel about on-the-ground risks, may represent a group the company doesn't directly engage with, or could help the company navigate complex local laws and political context.

→ Utilize shareholder resolutions.

Shareholder resolutions are effective at garnering executive buy-in and spurring action on an issue, even when they don't pass. Shareholder resolutions can be especially impactful in countries with higher thresholds for filing and/or more stringent requirements once resolutions are passed. In the US, companies typically pay attention to shareholder resolutions that get at least 20-30 percent of the vote and often choose to take some action on the issue. Engaging promptly on those issues can therefore be an effective tactic for spurring company action.

CSOs can work with activist investors to develop shareholder resolutions. However, they should not be the only tool used in a campaign because they can encourage publicly listed companies to go private to avoid such intense investor activism, and if the resolution fails by a significant margin it could embolden the company to continue undesired practices. For more information on how CSOs can utilize shareholder resolutions, check out Rights CoLab's [Fight Finance with Finance](#) guide, ShareAction's [resource hub](#), and As You Sow's [FAQ and resource page](#).

→ Follow-up with companies.

CSOs can ask for feedback loops if they aren't getting them. Sometimes follow-up from a company about the outcome of an engagement simply gets lost in the shuffle of work, and asking for it directly helps establish expectations. It is OK to be up-front about the information that should be received in return.

→ Demonstrate how geographic-specific issues are systemic.

Large global companies are not able to pay equal attention to geographic-specific issues in every country around the world. Therefore they prioritize based on a variety of factors, including severity of risks, legal/regulatory context, reputational risk, and market importance. If a CSO is advocating on behalf of a country that receives few resources and attention, it can be helpful to identify when country-specific issues and trends are more systemic, and leverage action that has taken place in other countries. For example, accurate content moderation of online platforms is a global issue—how do the dynamics in the specific country fit in with the broader picture? Similarly, responding to overbroad government requests for data or content removal is also a global issue. Are there dynamics in the country that are similar to others where the company has been devoting more resources? Using documented evidence and data to support these arguments also helps.

Conclusion

We hope this guide is genuinely helpful to CSOs seeking to engage with technology companies. Our goal is to provide actionable information and advice, marrying BSR's own experience with the vast knowledge and experience of civil society and company representatives experienced in stakeholder engagement. While we have endeavored to ensure the content in this guide will be relevant for many years to come, it's important to acknowledge that emerging regulation is likely to significantly impact how stakeholder engagement is carried out by technology companies. Strong stakeholder engagement is vital to ensuring the technology sector advances, rather than harms, the interests of people and society. All entities involved must do their part to ensure that this engagement is genuinely meaningful and effective and not unnecessarily constrained by regulatory requirements. We again wish to thank all those who contributed their time to sharing their knowledge and feedback on this guide. This was a true community effort!

Helpful Resources

There are several additional resources related to technology company stakeholder engagement with civil society that were referenced in this guide and may be helpful to review.

- [Engaging Tech Companies on Human Rights](#) by Global Partners Digital and the Global Network Initiative: This guide is an excellent introductory resource for CSOs just beginning to engage with companies.
- [Framework for Meaningful Stakeholder Engagement in AI](#) by the European Center for Not-for-Profit Law: A framework for tech companies about how to engage with external stakeholders on AI development, it applies to engagement in product development more broadly.
- [Five Practices to Improve Stakeholder Engagement in Tech Company Due Diligence](#) by the UN B-Tech Project: This paper reviews many of the challenges faced by CSOs in engaging with tech companies and recommends practices for companies to address them.
- [Dismantling the façade: A global south perspective on the state of engagement with tech companies](#) by the Business and Human Rights Resource Center: The report discusses the unique challenge CSOs from the Global South have faced in engaging with tech companies and provides recommendations to address them.
- [Stakeholder Engagement as part of human rights impact assessments by the Danish Institute for Human Rights](#) provides guidance to companies about how they should engage with stakeholders as part of conducting HRIAs.
- [Guide for conducting inclusive stakeholder engagement](#) is from Meta's content policy stakeholder engagement team, with input from other Meta teams as well as external organizations and engagement specialists. It provides an overview of how Meta conducts inclusive stakeholder engagement and provides recommendations for other companies interested in adopting similar practices.

About BSR

BSR is a sustainable business network and consultancy focused on creating a world in which all people can thrive on a healthy planet. With offices in Asia, Europe, and North America, BSR provides its 300+ member companies with insight, advice, and collaborative initiatives to help them see a changing world more clearly, create long-term value, and scale impact.

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