

FNET's Responsible Recruitment Working Group

Notes and Actions from the Workshop

Alignment of Employer Pays Principle EPP

29th February 2024, 10-4pm – In Person

1. Attendees:

Name - Business	Name - Business
1. Andrew Nicholson - 2STG	12. Imogen Wright – Lidl
2. Ed Smith – Aldi GB & Ireland	13. Leighton Hughes – MWW
3. Rebecca Fitchet– Angus Soft Fruit	14. Deborah Johnson – M&S
4. Rachel Dickens – Asda	15. Jo Speed PDM
5. Fiona Wheatley - Bakkavor	16. Joanne Gouldbourne - Princes
6. Emma Henry – Berry World	17. Rosie Iron – Sainsbury
7. Aisha Aswani –Co-op	18. Courtenay Forbes – Tesco
8. Lynsey Gill for Sharon Cross – G's	19. Carl Cooper – Westbridge Foods
9. Julia Black – Hilton Group	20. Rachel Munns – World Wise Foods
10. Barney Smyth – JLP	21. Louise Nicholls - FNET
11. Estelle Brennan –Labeyrie Fine Foods	22. Linda Beresford - FNET
Apologies Beth Leeman – Morrisons Sadia Mustafa – LaDoria Ginette Ferri - NES	Guest Speaker Laura McManus – Woolworth Au Neil Wilkins – IHRB Rosey Hurst – Impactt David Rousseau - Impactt Hannah Newcomb – Stronger Together-RRT

Meeting recording link: By agreement, this in person meeting was not recorded

Passcode: [Agenda slide deck here.](#)

2. Welcome – Courtenay Forbes

CF welcomed all participants and introduced our guest speakers. Each attendee gave a short introduction of name and company for the speakers. The reason to call the meeting as a result of commitment to EPP from FNET retailer members being inconsistent and resulting in confusion to suppliers. The workshop to determine how we can achieve alignment on the commitment and what does it practically mean to be 'committed'.

3. Setting the Scene – Why does EPP Matter – Rosey Hurst-Impactt

RH facilitated a compelling Q&A discussion with AW, sharing his experience of his recruitment in country, the fees and costs he had paid along the way to get a job to work in the UK as part of the SWS (Seasonal Worker Scheme). AW shared how the job was advertised and how it was described with the earning potential over the 6months of the scheme. He then shared his arrival in UK and the issues with the number of hours he was able to work due to the lateness of his arrival, i.e. the season nearly over and additional fees paid in UK for accommodation which he had not prepared for and costs of transport to get to another part of the UK to find further work. The lack of support to help him navigate the transport system and lack of access to medical facilities here. AW shared how the Government agencies added extra costs to all the admin steps to fast track the process of recruitment and Visa, "Speed money," thus at every step the costs had increased from the initial numbers.

The resulting indebtedness causing a risk to his family home in the sending country as this had been used as collateral for his recruitment fee. As a result of the irregular working hours and pay being

inconsistent and the inability to freely move to other more reliable work, but still having to cover accommodation costs, AW debt increased further. This prevented him being able to return home as the original debt had not been paid off and if he had returned home, the average rates of pay in his own country would never have been sufficient to cover the now impossible debt.

On paper despite there being some known costs to travel to UK for work, AW believed with the earning potential it was the right decision as the calculation appeared to suggest he would easily recover these based on the numbers he had been provided.

The events shared were a compelling summary of the misinformation from recruiters in terms of fees, loans, costs, and accurate earnings, together with the lack of support in both sending country and working country has left many International migrant workers arriving in the UK for work in a vulnerable position open to further exploitation.

The attendees at the session asked questions to further their understanding as well as what would he changed and what more could be done to prevent future issues.

4. EPP Survey Results - [Retailers](#) for detailed summary see slide deck and Appendix 1

5. EPP Survey Results – [Suppliers](#). For breakdown of comments for each Qu see Appendix 2

Summary

The results indicate for both Retailers and Suppliers despite a commitment to the principles of EPP, there are challenges with implementation in areas where there is little or no control of the recruitment process by the business and geographies with emerging issues.

Europe and SE Asia are the biggest challenges to implementing EPP. Businesses are keen to work with suppliers as long as the principles are in place and will continue to work with supply chains despite to support better understanding of issues.

Both retailers and suppliers were unable in general to commit to a timeline to comply with EPP and are unlikely to stop buying from a site where workers are paying fees with the caveat that these should be repaid.

Education and better understanding where key themes to make commitment to EPP

6. Group Discussion 1 – Facilitated by Rachel Munns

- What are the key learnings from the discussion
- How will this Impact your business
- What does commitment to EPP mean and can FNET members align around this.

Discuss what Commitment to EPP means and how it impacts your business			
Table 1	Table 2	Table 3	Table 4
Language could be easier	Commitment is the right thing to do	Clarity of definition is needed: fees and costs, who is responsible?	There are 2 parts to EPP -No Fees -Employer pays (burden of proof a risk)
No common definition between members – legal v illegal	We need to recognise the “Journey” and the Ambition – acknowledgement of this by customers	How do we create a level playing field? Rewarding those who are committed & compliant – lack of competitiveness	-Need effective Due Diligence - Document checks alone are not enough i.e. invoices
No level playing field – being Responsible has	Lead by example and look at own operations first - SCOPE	Priority List – which tiers, countries and industries?	How do we demonstrate we have not contributed

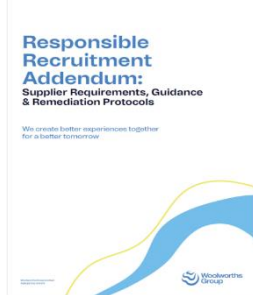
competitive disadvantage			to exploitation through lack of DD?
<p>Fear – to own the EPP challenge – but why is this different to living wage?</p> <ul style="list-style-type: none"> - Extent of the cost and scale -Historical Accountability -Lack of transparency -Illegality -Complexity of who is responsible -Migrant worker motivation to come to UK for citizenship so willing to pay the fee & take the risk 	<p>Three phases to commitment: -</p> <ul style="list-style-type: none"> -Understand the financial implications of, scale, where is the fees incurred -Remediation – only a short-term solution, need to address root cause -Implementation via collaboration 	<p>EPP has complex challenges to justify and identify what the fees are (ILO simple graph)</p> <p>What about the countries that don't have legislation or a definition</p>	<p>Is commitment to EPP also a long-term commitment to suppliers</p>
<p>What is reasonable Remedy?</p> <ul style="list-style-type: none"> -Highest severity (those that arrive late and cannot recover the cost, stuck in UK with family being threatened. <p>Average earnings less than the fees – hardship fund</p> <p>Advocacy</p>	<p>Applying as per the full ILO definition</p>	<p>Who is Responsible?</p> <p>Labour for the cost of EPP?</p> <ul style="list-style-type: none"> -Labour Provider/Buyers/Retailers/Farming/Processor 	<p>Advocacy with others to effect change i.e. Leadership Group Responsible Recruitment (LGRR)</p>
<p>Summary of all groups following feedback and discussion</p>			
<ul style="list-style-type: none"> - Need a clear definition of EPP - Businesses need to prioritise actions based on highest risk/vulnerability - Agree who is responsible for the recruitment cost and remedy payments - Ensure we develop a commercially level playing field - Commitment includes a clear timeline AND reporting - Commitment to the Journey/Ambition is more realistic– will help us align for FNET whilst we understand the issues - Fees – How do we get evidence of these for businesses to remedy? What about the “cash” where there a likely to be no receipts for verification - How do we balance the vulnerable workers - We need to consider the Commercial pressure on buyers and impact on supply chains - Buyers need to understand how their behaviour impacts EPP - Concern on Audit reliability on this topic. - How can we use the SMETA audit when it is applied inconsistently for suppliers. Is fees a Critical or major N/C (based on auditor view of management controls) can we check? - What is reasonable remedy – learnings from living wage - What is Effective Due Diligence? (Ref OECD) - Does long term supplier commitment help EPP - We must move away from repayment of fees being normalised and address root cause - Advocacy with others (Peers, Government, Agencies) - Lead by example – focus on own operations first, then supply chains to share the learnings. - Stages of Implementation and commitment. The journey to EPP <ul style="list-style-type: none"> - Map the Process - Visibility - Gather the impacts - Transparency - Action Plans 			

- Short term remediation
- Long term root cause
- Full Implementation of EPP

7. A perspective from Australia – Laura McManus, Woolworths

See slide deck for the insights from Laura from her experience in Australia in operationalising EPP there. Key lessons shared from Woolworth's remediation: -

During remediation:




- Affected workers must remain at the centre of decision making, so they are supported and do not experience further harm
- Directly engage with the CEO, both internally and at the supplier site
 - Immediately set clear expectations of next steps, timeframes for completion of individual action items, as well as set an overall timeline to complete remediation
- Build supplier capability by facilitating external advice and providing resources
- Consider leverage from multiple perspectives

Making a start in other parts of your supply chain:

- Apply the UNGPS salient risk lens to prioritise EPP focus areas
- Develop a government advocacy strategy with insights from your work

8. Barriers to Implementation of EPP – Neil Wilkins, IHRB



Responsible Recruitment – Barriers to implementation of the Employer Pays Principle

Recruiters

- System of worker pays is very embedded and entrenched
- Cash flow – many recruiters cannot function without up-front payments
- Small scale operators
- Lack of leverage
- Corruption in Govt processing centres
- Lack of trained staff

Suppliers

- Cash flow – up-front payments
- Potentially paying for staff for whom they may have insufficient orders / Seasonal workers
- Hiring managers – demanding payments to award contracts
- Insufficient visa allocation
- Fear of workers absconding

Brands

- Lack of oversight
- Output at suppliers – if you only own 5% output why would you pay full recruitment costs?
- Purchasing practices
- Price competition

9. Group Discussion 2 – Facilitated by Hannah Newcomb, Stronger Together/RRT

- Identify barriers in own operations
- Share any examples of Good Practice and Progress
- How can FNET& others support commitment to EPP

Identify barriers to implementing EPP		
Group 1	Group 2	Group 3

Fear of costs – currently unknown	Lack of knowledge of the true costs paid.	Financial Implications are unknown Fear of setting precedent.
Reputational Risk	Politics, legal ramifications, risk of enforcement	Fear of Transparency as leads to criticism from NGO's and others. Better not to commit than be challenged
Power Dynamics impacting workers	Power dynamics – limited worker voice and discrimination	
Challenges in transferring knowledge across the business	Disconnect between ethical teams, commercial teams and priorities	
Remoteness of the supply chains		Need to get our own house in order first in UK before applying to supply chains
Cost of Due Diligence Activity		Lack of repercussions in the UK – no regulation specific to fees
Fear of customer response & repercussions	Trust and comfort levels to share openly any issues with customers	No defined customer requirement of fair remedy – Alignment needed
Fear that remedy and costs covered is abused by those who aren't victims	Inflated costs with limited capacity for oversight in Labour Supply Chains	Fear of funding corruption
Identifying Responsibility	Need shared responsibility	
Examples of Progress		
Vulnerability assessments x 2		
Increased identification of cases leading to improved understanding and prioritisation		SMETA auditor competency is improving in this topic
Fees are being remediated when identified		Greater collaboration
How can FNET & Others support?		
Can FNET help facilitate internal conversations?		Seasonal Worker Scheme - development of minimum expectations for recruitment from a new country
Develop a common approach to remediation of issues in audit		Provide a template for vulnerability assessments
Engagement in 'Fair & Transparent' recruitment		Support to identify saliency
Encourage suppliers to share labour supply chain mapping information		Develop a roadmap for implementation

10. Agree the Roadmap for FNET & Members – Summary Next Steps from Courtenay Forbes

What does taking one step forward on EPP look like?

1. Creating safety for suppliers to raise fee issues to customers:
 - a. reassurance around protection from de-listing
 - b. fear of ownership and 'opening pandora's box'- shared responsibility
 - c. incentives for looking for fees/implementing zero fees
2. Creating a phased approach proposal:
 - a. definition of 'excessive fees' overlaying with vulnerability of workers

- b. Defining tiers of the severity of types of fees and costs from the ILO list - amount, type, legality, impact on worker, average length of debt, level of vulnerability
 - c. Developing best practice around how members can approach identifying and remediating costs based on severity
 - d. members can then agree on this tiering which would create roadmap for which fees to prioritising finding, remediating and eradicating
3. Remedy
 - a. develop guidance for FNET members on what good remedy looks like, analogous to the 5 criteria of effective grievance mechanisms
 - b. i.e. theme of not letting perfect prevent good: e.g. % of most serious fees remediated
 - c. % of workers provided with financial support to pay off 'most serious fees
4. Consider:
 - a. key labour sourcing countries
 - b. what is a reasonable recruitment fee in each country - Impactt 2022 analysis!!
 - c. Verité cost calculator (SE Asia)
 - d. use existing resources!

Appendix 1- Retailer Responses

1. Do you have a set timeline in which you expect all your Tier 1 sites to comply with EPP

7 Responses

ID ↑	Name	Responses
1	anonymous	no- former ambitions for this removed once established the industry would not be setting same expectations
2	anonymous	No
3	anonymous	No timeline yet
4	anonymous	No. EPP compliance is noted as a fundamental expectation in our Standards for Suppliers, as is compliance with the full ETI Base Code. We are aware that both are breached throughout the supply chain (e.g. working hours, overtime premiums etc.). Our expectations are for suppliers to demonstrate continuous improvement but we have not assigned a timeline to this.
5	anonymous	We are members of IHRB's LGGR and its collective public commitments and timelines
6	anonymous	Not at this stage
7	anonymous	No

2. In 2024 will you continue to source from Tier 1 sites that are not compliant with EPP and where there is evidence of workers paying recruitment fees and costs?

7 Responses

ID ↑	Name	Responses
1	anonymous	yes- we have talked in our modern slavery statement on the need to allow time for the industry and suppliers to move towards this.
2	anonymous	Yes - we have not yet embedded EPP into Buyer decision making
3	anonymous	We will continue to source from tier 1
4	anonymous	Yes probably, although where instances are identified we would expect that supplier, and relevant involved parties, to investigate and remediate. Terminating business with a supplier is considered a last resort.
5	anonymous	We will work with sites and workers in our supply chain to understand the nature of any recruitment fees and costs, how they sit with the ILO definitions etc. NB to the best of my knowledge, there is no widely used assessment for whether or not sites are 'compliant' with EPP?
6	anonymous	If this is picked up in a SMETA audit, we will ask the supplier to remediate the issue within the timelines given by the auditor (we manage it as other NCs). There are challenges around when the fees are legal, but not in line with EPP.
7	anonymous	No

3. To date have your purchasing decisions been influenced by EPP compliance? Please provide examples, where appropriate eg choosing to source from a complaint site in...

7 Responses

ID ↑	Name	Responses
1	anonymous	de-listing two sites in Thailand in 2022 for refusal to comply with policy responsible recruitment requirements .
2	anonymous	No - we have not yet embedded EPP into Buyer decision making
3	anonymous	This currently does not influence our purchasing decision. However, we do have a requirement that suppliers employ the EPP principle.
4	anonymous	No. If prior to sourcing we are made aware of an outstanding audit non-compliance/incident for recruitment fees, we may require closure before approving for supply depending on the context of the situation. We do not currently assess specifically for EPP compliance during onboarding.
5	anonymous	In tender processes, we factor in T1 suppliers visibility of issues and plans to address, not 'compliance' per se. Transparency and willingness to engage is important - we will typically favour a 'carrot' rather than 'stick' approach in our work on the topic
6	anonymous	If there is a critical NC, the site will need to close it before any progress can be made with onboarding. We rely on it being reported via SMETA.
7	anonymous	No

4. In 2024 will you onboard new sites that are not compliant with EPP?

[More Details](#)

Yes	2
No	1
Depends	4



5. If you answered Depends, please explain what factors are influencing this?

4 Responses

ID ↑	Name	Responses
1	anonymous	areas where specific requirements are in place
2	anonymous	We are focusing on certain issues with workers paying recruitment fees in Asia. However, the issue in the SWS is slightly harder to remediate. We need to gather some more information and gain a better understanding of the issue before we stop sourcing from suppliers that don't employ EPP.
3	anonymous	Level of visibility, supplier willingness to engage etc.
4	anonymous	what other due diligence is in place

6. Do you take a consistent position on EPP across regions, eg European, SE Asia, Other geographies? If So, Explain Why?

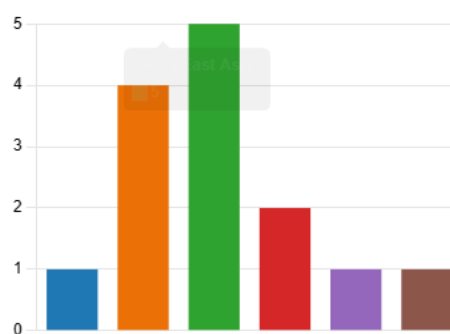
7 Responses

ID ↑	Name	Responses
1	anonymous	no, specific requirements for Thailand and Malaysia
2	anonymous	Yes, based on finding and addressing risk
3	anonymous	SE Asia
4	anonymous	Our current position is consistent across sourcing regions as we want to recognise EPP as a fundamental expectation in our Standards for Suppliers. We appreciate however that there are nuances specific to geographies that must be considered for delivery of this. Our ultimate goal is that all suppliers, regardless of location apply EPP fully, in the same way that we expect that all suppliers comply with the full ETI Base Code (of which we know there are breaches and geographic variation).
5	anonymous	Our Global Sourcing Principles are applicable everywhere
6	anonymous	Yes. We use the same process. However, the challenge we have is that NCs are not raised consistently across audits. We find issues particularly in the UK and Thailand.
7	anonymous	n/a

7. Which geography has your business recognised recruitment fee issues proving difficult to remedy?
Tick all that apply.

[More Details](#)

● South America	1
● Europe	4
● South East Asia (Thailand, Malay...	5
● South Africa	2
● North America	1
● Other - please provide details	1



9. How are you monitoring compliance to these commitments eg are you implementing zero fees and how is this monitored, or are you remediating where fees have been paid? or...

7 Responses

ID ↑	Name	Responses
1	anonymous	Yes to both - and monitoring through independent third party worker and site assessments
2	anonymous	Including EPP into supplier contracts (first step)
3	anonymous	We are working on remediating fees in certain areas that recruitment fees are prevalent.
4	anonymous	We encourage remediation of fees where they have been paid and engage with industry collaborations (e.g., SWS Taskforce, SEA Alliance) which are actively working on this topic. We do not currently monitor compliance beyond review of audit findings for those in scope of our audit requirements.
5	anonymous	As above
6	anonymous	We don't implement zero fees (the SWS requires workers to pay fees). In our Responsible Sourcing Manual, we say that the costs of recruitment should be born by the employer. this is monitored through SMETA. We expect them to have due diligence on their labour providers to make sure that workers are not paying recruitment costs. In the example of the SWS, we have worked with growers to reinforce their due diligence and have remediation in place where there is evidence of recruitment fees being paid (above visa and travel costs). We refer to the guidance developed by the SWS Taskforce.
7	anonymous	Not yet monitoring

10. What in your opinion are the two key principles in establishing multi-stakeholder partnerships to address the EPP?

7 Responses

ID ↑	Name	Responses
1	anonymous	- commitment to reimburse fees where identified - commitment to review recruitment practices and cost structure to ensure zero fees model can be established moving forward
2	anonymous	Very early in the journey in understanding how to address EPP, keen to learn from others
3	anonymous	full transparency and a better understanding in the potential cost implications for all businesses within the supply chain.
4	anonymous	Prioritising objectives to provide evidence based studies that detail the actual cost of implementation, establishing a best practice framework for remedy, and supporting internal conversations with procurement functions. Bringing the right people in to the conversation - diverse representation across stakeholders, including rights holders.
5	anonymous	Agreed principles, common (consistent) tools leading to information sharing
6	anonymous	Involving all actors across industry (growers/employers/labour providers/worker representatives) to come to an agreed approach across industry of what we should do and who should pay for fees. We also need a consistent way of monitoring and raising the issues (e.g. a SMETA methodology to facilitate this).
7	anonymous	n/a

11. What is the biggest lesson you have learnt to date in establishing a policy and/or implementing the EPP?

7 Responses

ID ↑	Name	Responses
1	anonymous	the sheer amount of time needed to change mindsets and sustainably implement a process that is truly zero fees, rather than a continual process of 'find, reimburse, repeat'.
2	anonymous	Very early in the journey in understanding how to address EPP, keen to learn from others
3	anonymous	This issue is really hard to mitigate as the issue mainly happens even before the worker gets to labour providers. Suppliers can have all the checks and systems in place; however, they are still at risk of workers having paid illegal recruitment fees.
4	anonymous	Any review/activity to address non compliance with EPP has to consider impacts of sourcing and purchasing practices.
5	anonymous	Piloting is key for context specificity / relevance
6	anonymous	Having a black and white approach - it's challenging to implement. In some circumstances it's hard to see how it can be implemented (e.g. SWS requiring workers to pay fees). It is unfair to request suppliers to reimburse fees that are out of their control (becuase labour providers are the ones recruiting workers). Lack of protective legislation and due diligence by governments has made it even more challenging.
7	anonymous	n/a

Thank you to the following retailers who completed the survey who are listed in Alphabetical order to provide no link to the answers above to protect anonymity.

Aldi GB
Asda
Lidl GB
M&S Food
Ocado
Sainsbury's
Tesco

Appendix 2 – Supplier Results

1. Do you have a set timeline in which you expect all your Tier 1 sites to comply with EPP

15 Responses

ID ↑	Name	Responses
1	anonymous	Currently forms part of sourcing requirements.
2	anonymous	No not formally
3	anonymous	yes
4	anonymous	No
5	anonymous	No
6	anonymous	We expect all T1 sites to comply already
7	anonymous	No
8	anonymous	No
9	anonymous	NOthing set it is a preference
10	anonymous	No we do not
11	anonymous	No, the rules are not clear
12	anonymous	No
13	anonymous	Princes fully support the EPP, however have not committed to eliminate all recruitment fees by a specific deadline as we recognise the challenges in identifying where the fees may exist. Princes launched their Responsible Recruitment Migrant and Contract Worker Policy in 2020 which supports the EPP, and details Suppliers responsibilities, principles and suggested checks for Suppliers who use Migrant or Contract Workers.
14	anonymous	Not for all
15	anonymous	We expect all our Tier 1 and their labour providers to adhere to the EPP, this is checked through audits and if any non-compliance is found, the supplier is expected to solve it until the next audit, at the latest. This requirement is in place since several years.

2. In 2024 will you continue to source from Tier 1 sites that are not compliant with EPP and where there is evidence of workers paying recruitment fees and costs?

15 Responses

ID ↑	Name	Responses
1	anonymous	Supply chain geography has very low risk of recruitment fees therefore unlikely to source from these sites.
2	anonymous	Depends, we will not support suppliers who are charging recruit fees and related costs, however it is not always the supplier themselves who are involved in the charging of fees, e.g. UK seasonal worker scheme.
3	anonymous	no
4	anonymous	No, although we may not be in the position to ensure all are complaint with EPP we would not be sourcing from businesses with evidence of workers paying recruitment fees or costs.
5	anonymous	Yes
6	anonymous	96% of our direct suppliers (representing >99% of our procurement value) responded to a Bakkavor questionnaire and confirmed they support EPP.
7	anonymous	Two questions - Yes we will source but not if there is evidence of workers paying fees
8	anonymous	Yes
9	anonymous	Yes if workers are going to be repaid fees.
10	anonymous	Yes we will, but any ethical audit N/C's relating to recruitment fees must be closed out.
11	anonymous	Yes. If a worker does come to a growers with illegitimate costs then we will work with the SWS Operator to remediate
12	anonymous	Yes
13	anonymous	We are not aware at this stage of any suppliers not compliant with EPP. However our approach would be to support and educate any such suppliers to adopt EPP.
14	anonymous	Yes with condition
15	anonymous	We expect all our Tier 1 and their labour providers to adhere to the EPP, this is checked through audits and if any non-compliance is found, the supplier is expected to solve it until the next audit, at the latest. We support our suppliers to solve issues and remediate in case any non-compliance is found. The relationship with the supplier will only be terminated if we see no commitment to improve over the years.

3. To date have your purchasing decisions been influenced by EPP compliance? Please provide examples, where appropriate eg choosing to source from a complaint site in...

15 Responses

4	anonymous	No
5	anonymous	No
6	anonymous	Not been needed
7	anonymous	No
8	anonymous	No
9	anonymous	No examples yet as not easy to find out
10	anonymous	No, this does not influence purchasing decisions.
11	anonymous	N/a
12	anonymous	Yes We will no longer on-board supplying sites that are not taking steps to comply with EPP. We will however work with sites that are in the process of reaching compliance as we believe full compliance is complicated/takes time and we should reward sites that are 'on the journey'.
13	anonymous	Yes, this has influenced decisions. We worked closely with a supplier and retailer to provide visibility and the on-cost to remediate and back date EPP compliance. Sadly the retailer pulled away due to commercial reasons but we continue to work with the supplier.
14	anonymous	Yes
15	anonymous	EPP compliance is part of supplier evaluation. We have banned labour providers (Tier 2 suppliers) due to this issue and no will to remediate.

4. In 2024 will you onboard new sites that are not compliant with EPP?

[More Details](#)

Yes	3
No	2
Depends	10



5. If you answered Depends, please explain what factors are influencing this?

10 Responses

ID ↑	Name	Responses
1	anonymous	ability to meet quality, volume and shipping dates. This is important and then we can work on the issues that need sorting
2	anonymous	we may not be in the position to ensure all are complaint with EPP at this time, we need to look at our internal processes. we would not be sourcing from businesses with evidence of workers paying recruitment fees or costs.
3	anonymous	They will be given time to understand the detail & scope of EPP and to implement compliance mechanisms
4	anonymous	Contingency purchasing but no EPP policy in place
5	anonymous	SUPpier. COuntry amount of fees and if workers are repaid
6	anonymous	Guidance, governance of EPP
7	anonymous	We will only onboard sites that are at least partially compliant. For example, we would make an exception for walk-in recruitment but would expect all fees for MOU recruitment to be covered - Thai sites.
8	anonymous	Although we do not encourage non-complaint sites to work with us
9	anonymous	Conditional approval with agreement on a timeline to drive progress
10	anonymous	Magnitude, impact on worker, will to remediate, where the cost has taken place in the supply chain.

6. Do you take a consistent position on EPP across regions, eg European, SE Asia, Other geographies? If So, Explain Why?

[More Details](#)

[Insights](#)

15
Responses

Latest Responses

"Yes. Same standard across sourcing regions."

"Yes "

"Yes, to ensure a consistent message is communicated"

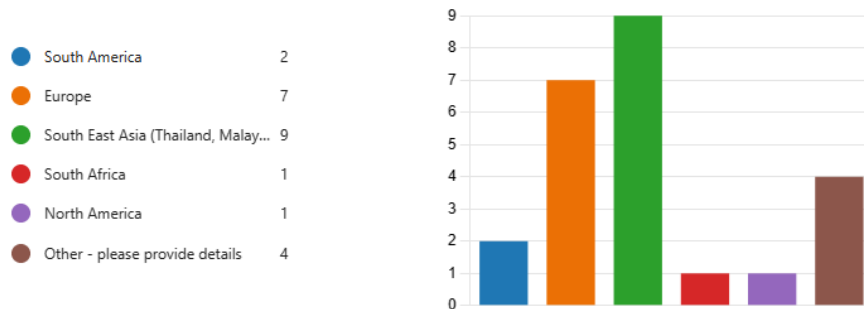
3 respondents (20%) answered **Yes** for this question.

Word cloud content:

- No policy
- local cultures
- place
- consistent message
- supplier
- blanket approach
- job
- internal standards
- No - recruitment
- retail
- UK
- regions
- recruitment maps
- standards
- EPP
- maps are different
- no workers
- requirements
- sites

7. Which geography has your business recognised recruitment fee issues proving difficult to remedy?
Tick all that apply.

[More Details](#)



9. How are you monitoring compliance to these commitments eg are you implementing zero fees and how is this monitored, or are you remediating where fees have been paid? or...

15 Responses

ID ↑	Name	Responses
1	anonymous	Internal SAQ's, social audits and commitments to sourcing requirements
2	anonymous	Audits. Updating our supplier ethical responsibility policy this year and this will be explicitly mentioned in the new version.
3	anonymous	SMETA overseas along with regular visits from management and compliance staff. Agency audits in the UK
4	anonymous	From a business perspective we take the payment of fees seriously, we are currently rewriting all 2024 SLA for agencies whom we use personally as a business. for our suppliers of goods, the technical team are currently issuing a supplier code of conduct. however it has become a hot discussion point recently as to who is their to support suppliers if they find an issue and whom is responsible for investigating and who takes responsibility when a fee was potentially paid many layers down the recruitment line, also what level of evidence is enough to ensure recruiters take responsibility.
5	anonymous	N/a
6	anonymous	Our supplier code of conduct has a clause requiring suppliers to support the Employer Pays Principle whereby no worker should be required to pay for their employment. We ask all suppliers to complete an SAQ to confirming they comply with our EPP requirements
7	anonymous	Our only options are external audits but no formal policy in place
8	anonymous	NO
9	anonymous	AUDits
10	anonymous	We have a zero fee policy and expect suppliers to have the same.
11	anonymous	Remediation where illegal fees paid
12	anonymous	I spend a huge amount of time in the field engaging HR teams directly to understand their recruitment processes and procedures. We also regularly interview migrant workers. We do not rely solely on SMETA audits as we deem these ineffective on this topic.
13	anonymous	Worker Voice Programmes, with recruitment fee questions built on. For example the Just Good Work App was launched in our PTM sites in Winter 2023.
14	anonymous	Remediating when fees had been paid
15	anonymous	Mentioned above.

10. What in your opinion are the two key principles in establishing multi-stakeholder partnerships to address the EPP?

15 Responses

ID ↑	Name	Responses
1	anonymous	Trust and communication
2	anonymous	A full understanding within industry of who is responsible for remediating/ reimbursing fees paid. A working-together-to-improve-conditions approach rather than a blame culture.
3	anonymous	agreement on remediation.
4	anonymous	? I do not feel that my knowledge is yet enough to form an opinion
5	anonymous	Transparency and consultation
6	anonymous	There is a need to align U.K. government legislation and industry expectations in relation to recruitment fees for migrant labour
7	anonymous	N/A
8	anonymous	Engagement with all involved. Establishing a process for investigations and remediation that all can accept
9	anonymous	Get global agreement especially in countries where is expected and/or legal
10	anonymous	Long term relationship with suppliers. Clear unambiguous policy addressing EPP.
11	anonymous	1. We need to understand internally how far we should go on EPP before setting standards for our suppliers For growers to pay flights, passports, visas at this stage it is not possible as there is no governance or guidance. If a worker is dismissed for inappropriate work conduct or request transfer after small number weeks. Then who is responsible for EPP? Where does SWS operator come in?
12	anonymous	Creating a level playing field where members all agree to the same principles and timelines.
13	anonymous	raising awareness of the policy / approach and building our understanding of where fees are paid
14	anonymous	Collaboration is key- one voice from the buying community
15	anonymous	Definition of cost / fee; responsibility.

11. What is the biggest lesson you have learnt to date in establishing a policy and/or implementing the EPP?

15 Responses

ID ↑	Name	Responses
1	anonymous	Have had very few challenges with EPP due to nature and location of raw material sourcing
2	anonymous	Very hard to establish where fees have been paid as some workers do not understand the issue due to cultural norms and therefore do not report this.
3	anonymous	We do not appear to have a problem as recruitment overseas is from within the community. Using Stronger Together compliant agencies in the UK
4	anonymous	Still learning, and need lots of advise and guidance.
5	anonymous	N/a
6	anonymous	EPP is well understood by companies that supply UK food retailers and large FMCGs, but less well understood beyond that and international markets
7	anonymous	N/A
8	anonymous	it is difficult to get a consensus on where responsibility lies If fees are found, you cannot establish a thorough investigation process
9	anonymous	Not black and white
10	anonymous	Engagement from senior management within the business.
11	anonymous	There are too many variables and grey areas
12	anonymous	Detail is key! We have had sites confirm they will comply with EPP but later realise you have different definitions of EPP.
13	anonymous	lack of awareness and clarity within the supply chain as to what constitutes a 'fee'
14	anonymous	One size doesn't fit all- and ensuring the same message is shared at all level of your organisation
15	anonymous	You have to investigate; it is a lengthy and resourceful process to establish the remediation.

2 respondents (13%) answered **Foods** for this question.



13. What is the nature of your business?

[More Details](#)

● Importer	8
● Manufacturer	6
● Packer	6
● Other	5



[End]