



# Responsible Recruitment Working Group

The Food Network for Ethical Trade – Friday 23<sup>rd</sup> May. 2025



# Competition Law and Safe Space Statements

## Participant Identity:

*Please display your **name** and the **business name***

## Competition Law Statement

*“We are meeting to discuss issues raised in the forum of the Food Network for Ethical Trade.*

*We take competition compliance seriously. Whilst discussions can cover matters of interest to our industry, we cannot discuss or exchange sensitive commercial information.*

*If at any time during this meeting, you think our discussions may be in breach of competition rules, please inform the Chair. The Chair may close the meeting at any time if the chair believes that discussions are in breach of competition law”*

## Safe & Brave Space Statement

*The fortnightly members call is a **safe & brave** space for members to discuss and exchange ideas on human rights risks and improvement actions and all are reminded to please always respect this principle.*

# Introducing our Guest Speakers

**Laura McManus – Woolworths  
Group & Churchill Institute**



**Anna Norgett –  
Stronger Together**

# Responsible Recruitment Working Group – 23/05/2025, 10am

Time	Topic	Speakers
10.00-10.05	Welcome	Courtenay Forbes, Tesco Rachel Munns, Worldwide Foods
10.05 – 10.15	Phased Approach to Responsible Recruitment: next steps	Courtenay Forbes, Tesco Rachel Munns, Worldwide Foods
10.15-10.55	Examining best practices in responsible recruitment to reduce forced labour risks among migrant workers in Australia	Laura McManus
	5 min break	
11.00-11.20	Resources on Responsible Recruitment	Rachel Munns, Worldwide Foods Anna Norgett, Stronger Together
11.20-11.30	Planning – Q2 onwards	All



# Responsible Recruitment Roadmap 2024/5



## Considerations

- Key labour sourcing countries
- What is a reasonable recruitment fee in each country Impactt 2022 analysis!!
- Verité cost calculator (SE Asia)
- Use existing resources!

## Slide 5

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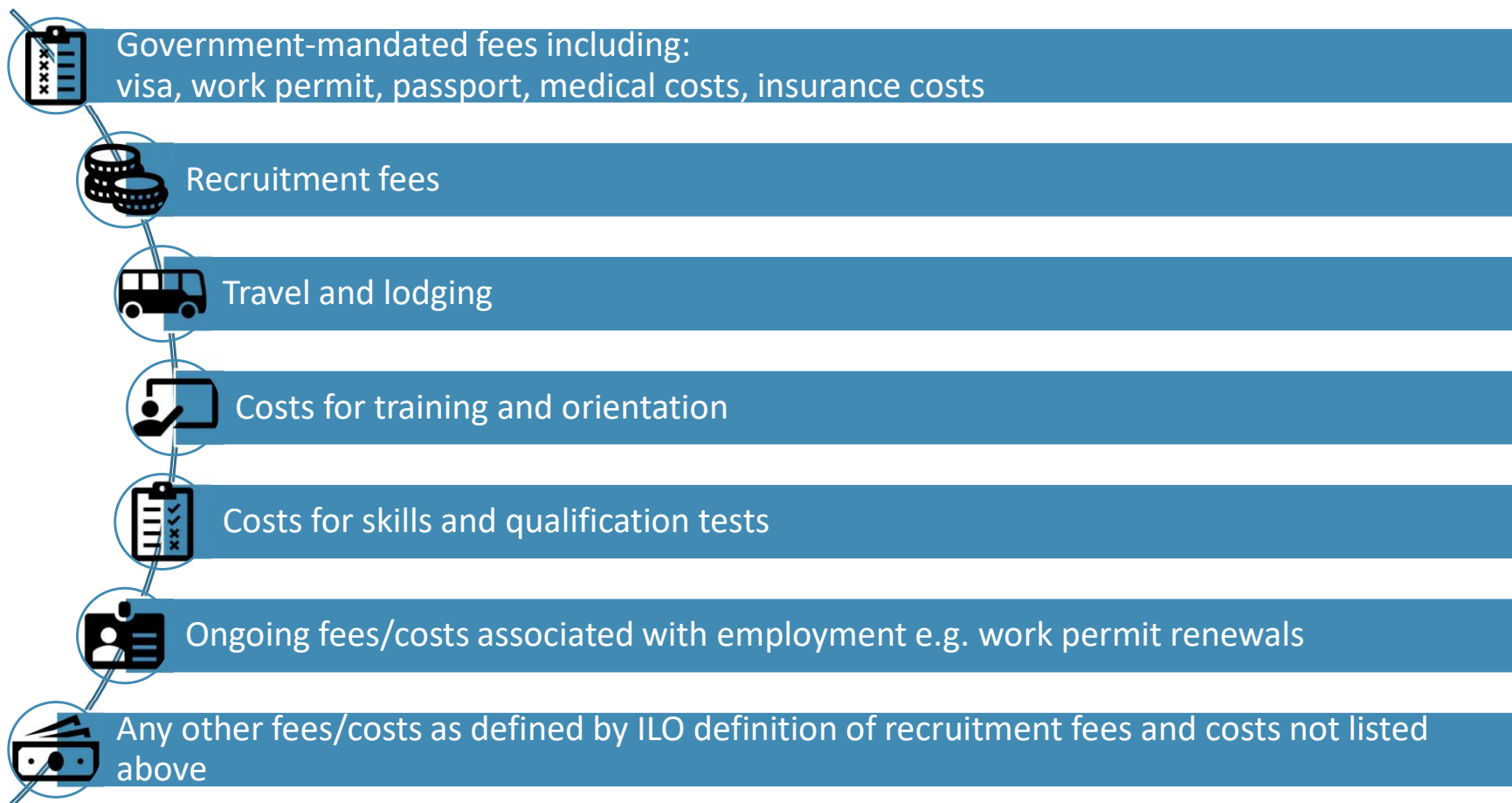
**ST0**

Does this need updating for 2025-6?

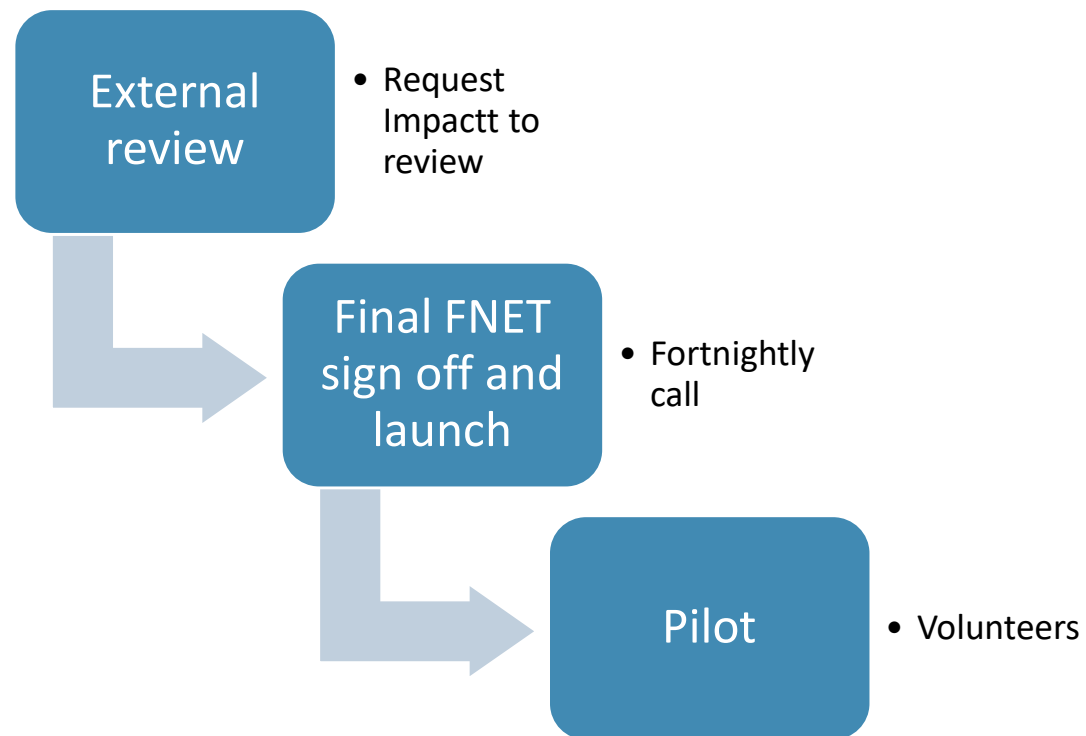
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# Phased Approach



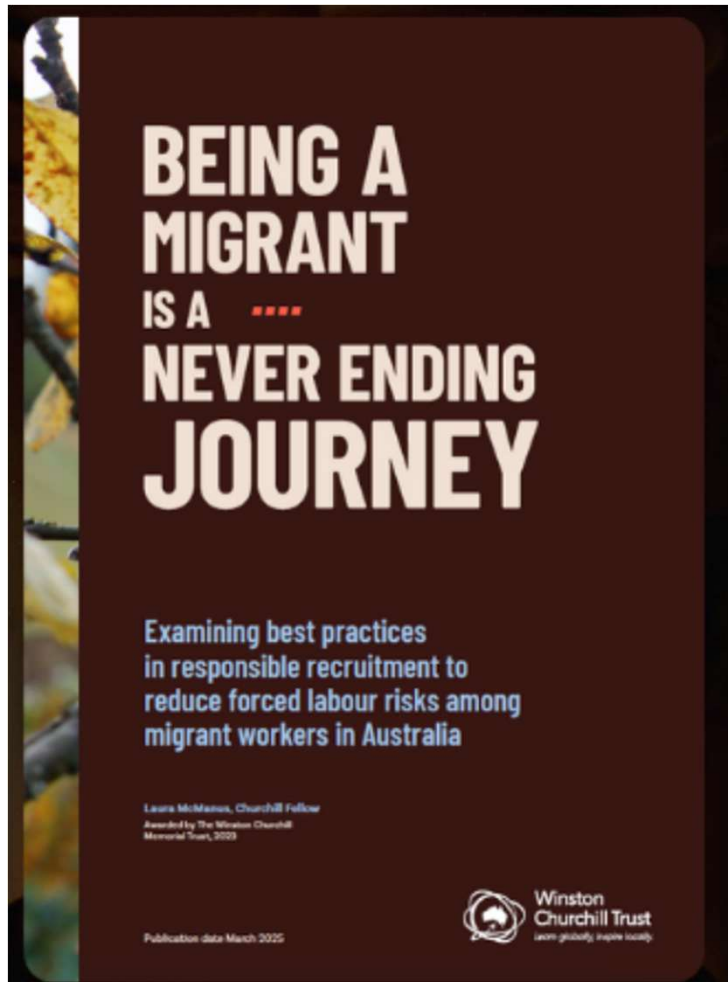
## Next steps





## Member questions in Teams poll

- Can you see your business using this?
- What other support do you need?



# Recruitment Practices in the Pacific

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Laura McManus  
2023 Churchill Fellow



# Research Objectives

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1. To understand current recruitment practices in key Pacific Island Countries and map these against best practice principles in responsible recruitment
2. To explore models of effective sector-based collaboration that address forced labour risks related to migrant worker recruitment



# Recruitment landscape variations

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- **Fiji:** Centrally managed by the government's National Employment Centre with minimal private sector involvement
- **Samoa:** 70% government-managed with 30% recruited informally through networks
- **Tonga:** Mixed model balancing government work-ready pools and direct recruitment
- **Vanuatu:** System of over 70 licensed private recruitment agents with limited due diligence





# Reviewed against the Dhaka Principles and ILO Forced Labour Indicators

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## **Equal Treatment/Non-discrimination Risks**

- Selection bias based on family status in both government and agency-led recruitment
- Informal "blacklisting" of workers who don't conform to community expectations
- Use of pregnancy testing by some actors despite this being discriminatory



# Reviewed against the Dhaka Principles and ILO Forced Labour Indicators

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## Recruitment Fees and Hidden Costs:

- While outright recruitment fees were rare, "related costs" were common
- "Gesture money" for recommendation letters from community leaders
- Community fundraising creates an unspoken expectation of repayment
- Unclear roles and compensation for "team leaders" acting as informal intermediaries



# Reviewed against the Dhaka Principles and ILO Forced Labour Indicators

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## Contract Clarity and Transparency Issues:

- Workers often receive contracts only days before departure
- Limited explanation of deductions, especially when contracts are only in English
- Undeclared or unexpected salary deductions appearing after arrival





# Reviewed against the Dhaka Principles and ILO Forced Labour Indicators

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## **Freedom of Movement Limitations:**

- Opaque governance around passport retention, particularly regarding team leaders holding documents for extended periods
- Employer-tied visas increasing vulnerability
- Cultural monitoring outside of work hours by team leaders
- Excessive restrictions framed as "pastoral care"





# Cultural context is a primary influence

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- Family and community pressures can create invisible constraints
- Communal fundraising for pre-departure costs creates social obligations
- Cultural deference to authority may prevent workers from raising concerns

These cultural dimensions can create conditions where certain forced labour indicators exist, but in ways that are less visible than in other migration corridors.



# Systemic issues and governance gaps

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- **Governance gaps** in recruitment oversight, particularly regarding informal actors like team leaders
- **Unclear cost structures** with limited transparency about what workers must repay
- **Inadequate pre-departure information** about working conditions and deductions
- **Cultural factors** that complicate traditional forced labour detection approaches

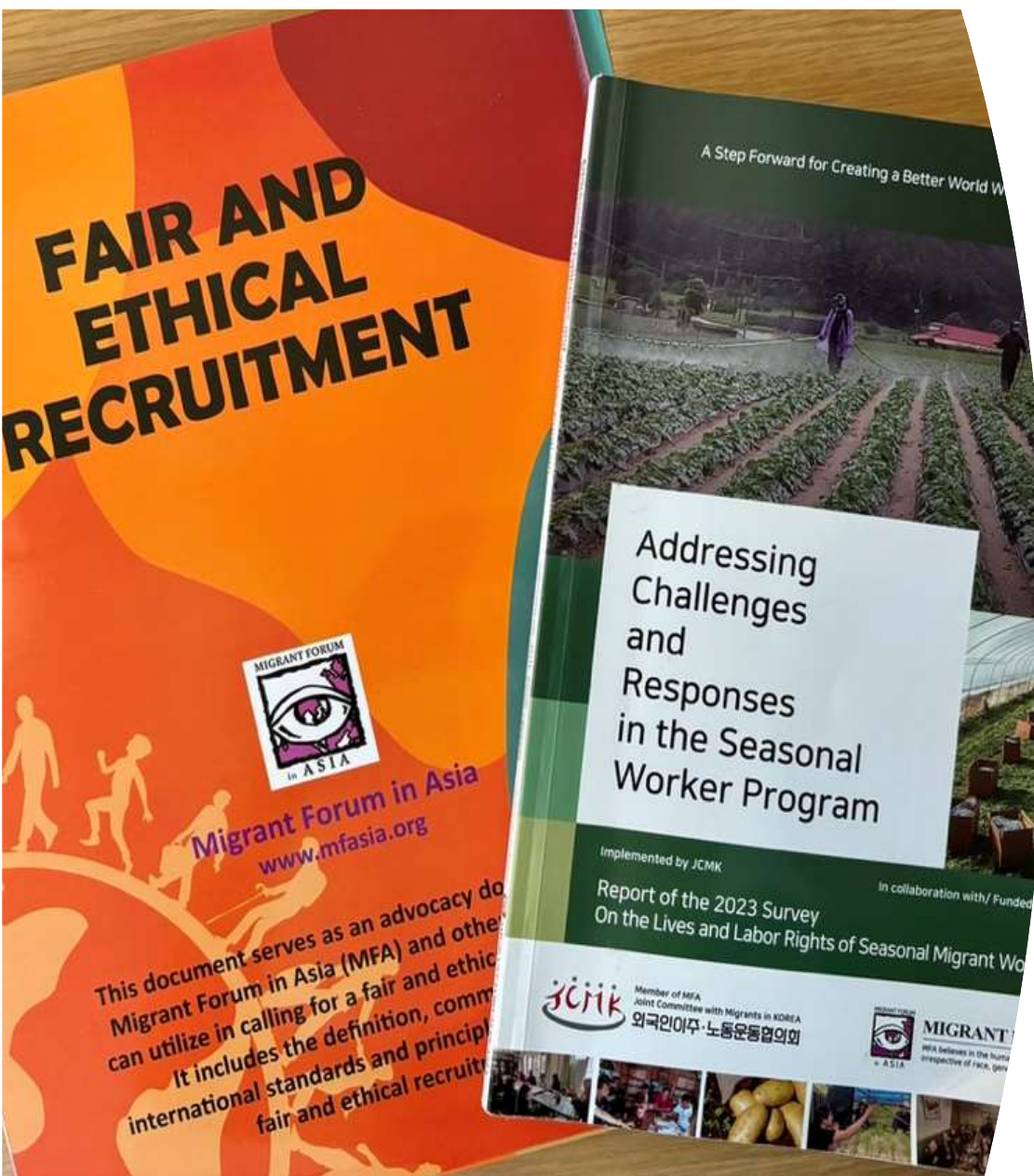




# Key Policy Recommendations

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- **Enhanced pre-departure governance**, with clearer regulations around team leaders and informal intermediaries
- **Standardized cost transparency** with itemised receipts for all worker-borne expenses
- **Improved contract timing and accessibility** in languages workers understand
- **Strengthened grievance mechanisms** accessible during the recruitment stage
- **Cultural context training** for companies and auditors assessing recruitment practices



# Key insights for business

- **Risk awareness:** Understanding the nuanced ways recruitment risks manifest in different sending countries and labour migration corridors is essential for effective due diligence
- **Adaptation:** Responsible recruitment approaches need to be contextually appropriate, not one-size-fits-all
- **Collaboration opportunity:** We need more buyers contributing to the norm setting on ethical recruitment



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Responsible recruitment | Fair work | Free from exploitation

# Responsible Recruitment Resources

Anna Norgett, UK & ROI Programmes Manager  
May 2025



Responsible recruitment | Fair work | Free from exploitation

**Our Vision** is a world where all workers are recruited responsibly and have fair work free from exploitation.

**Our Mission** is working together to enable organizations to embed responsible recruitment and employment practices and mitigate labor exploitation in their operations and supply chains





#### Consumer Goods Programme



#### Construction Programme



#### Italy Programme



#### Responsible Recruitment Toolkit Programme



#### South Africa Programme



#### UK Apparel and General Merchandise Programme (Fast Forward)




#### Supporting Partners




**stronger  
together**

# Driving impact at scale and continuous improvement: Building capacity across your operations and suppliers


## Motivate and inform via training




**Introduction to Responsible Recruitment**




**Fair, Equal & Dignified Opportunity and Treatment**



**Eliminating Worker-Paid Recruitment Fees**



**Labour Supply Chain Due Diligence and Partnerships**



**Safe Work for Agency/Contract Workers**

Practical steps to ensuring that work is safe for agency/contract workers.

## Support implementation via practical resources (offline or online)

This resource is prepared by ResponsibleRecruitmentToolkit.org for the use and benefit of RRT Subscribers. It is for information only and should not be taken as, or as a substitute for, specific legal advice on any area.

This template is intended to provide a base set of terms which must be amended to align with the specific statutory requirements of your territory and the needs of your business.

This resource is applicable to: Labour Providers and Direct Employers

**TEMPLATE CONTRACT OF EMPLOYMENT**

**OVERVIEW OF THIS RESOURCE**

The Responsible Recruitment Toolkit Template Contract of Employment is a document that when used properly:

- Formalises a recognised employment relationship
- Defines the contractual terms between the employer and the worker, ensuring transparency
- Reflects the reality of the worker's working arrangements

It is imperative that the Contract reflects the reality of the worker's working arrangements and no care must be taken to ensure the template is appropriately edited.

Different countries and territories will have statutory requirements that need to be included within the employment contract. In order to make it compliant with local legislation, please ensure that you add these requirements to the contract, along with any additional benefits or requirements that are specific to your business.

All the information, guidance and resources needed to implement and maintain the standards within the agreement can be found in the Toolkit.

**Definitions (delete if not applicable)**

Labour User  
Assignment  
Assignment Schedule

**SI USTED ESTÁ VIVIENDO O SUFRIENDO ALGUNAS DE ESTAS CONDICIONES, PUEDE ESTAR EN UNA SITUACIÓN DE TRABAJO FORZADO.**

**¿Usted tiene derechos y hay ayuda?**

En línea: [www.strongertogether.org/la](https://www.strongertogether.org/la)  
Llamada: 1-888-372-7888  
Envía un mensaje de texto: 233583  
Chat: [www.strongertogether.org/la](https://www.strongertogether.org/la)

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## Assess, progress and demonstrate via tools (online and offline)



**stronger together US**

**Labour Provider/Recruitment Business Good Practice Implementation Checklist**

Download this checklist as an interactive PDF form at [www.strongertogether.org/la](https://www.strongertogether.org/la).

Company Name: \_\_\_\_\_ Size: \_\_\_\_\_  
Country: \_\_\_\_\_ Email: \_\_\_\_\_  
Date: \_\_\_\_\_

Good Practice	Score
1. Conduct a needs-based risk assessment for your business	1
2. Develop a recruitment policy	2
3. Adhere to the rules of forced labour and other labour exploitation within your business	3
4. Adhere to the rules of forced labour and other labour exploitation within your business	4
5. Adhere to the rules of forced labour and other labour exploitation within your business	5
6. Adhere to the rules of forced labour and other labour exploitation within your business	6
7. Adhere to the rules of forced labour and other labour exploitation within your business	7
8. Adhere to the rules of forced labour and other labour exploitation within your business	8
9. Adhere to the rules of forced labour and other labour exploitation within your business	9
10. Adhere to the rules of forced labour and other labour exploitation within your business	10

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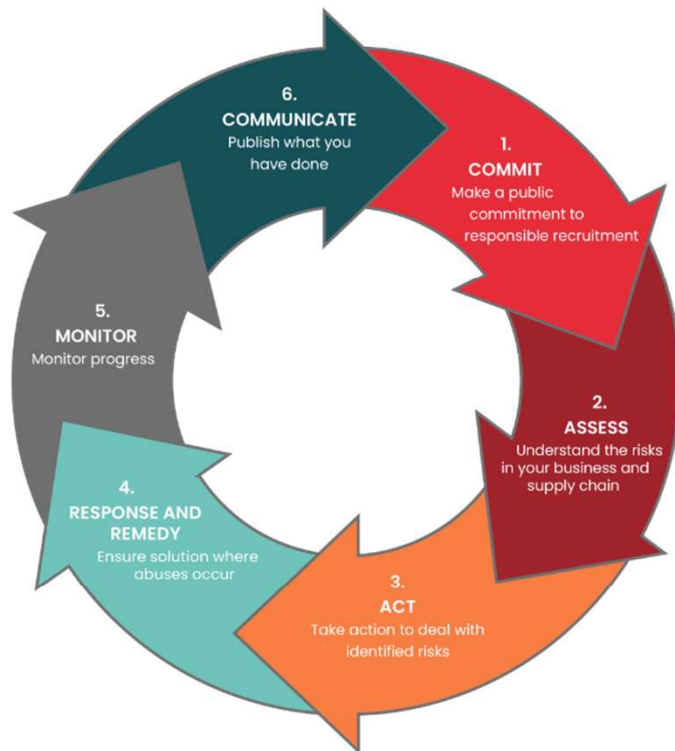


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Responsible recruitment | Fair work | Free from exploitation

# Motivate and inform

# Organisational responsible recruitment standards



**1. NO FORCED LABOUR**



**2. NO CHILD LABOUR**



**3. NO RECRUITMENT FEES**



**4. TRANSPARENT RECRUITMENT**



**5. ELIGIBILITY TO WORK**



**6. WAGES AND BENEFITS**



**7. REGULAR WORK AND WORKING TIME**



**8. SAFE WORK CONDITIONS**



**9. ACCOMMODATION AND TRANSPORT**



**10. FREEDOM OF ASSOCIATION**



**11. FAIR TREATMENT**



**12. TERMINATION RIGHTS**



**13. REMEDY AND WORKER-CENTRED CULTURE**



**14. BUSINESS CONDUCT**



**15. EFFECTIVE MANAGEMENT SYSTEMS AND DUE DILIGENCE**



# International responsible recruitment standards

**Dhaka Principles**  
for migration with dignity



**Sedex**



International  
Labour  
Organization

WORLD  
EMPLOYMENT  
CONFEDERATION



**IRIS**  
ETHICAL RECRUITMENT



UNITED NATIONS  
GUIDING PRINCIPLES  
ON **BUSINESS**  
& HUMAN RIGHTS



Gangmasters &  
Labour Abuse Authority



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together



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# Support implementation

# Our resources



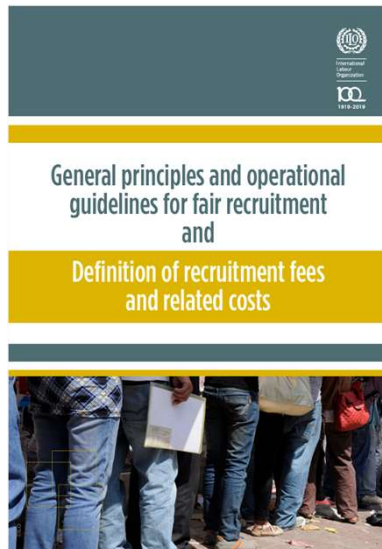
- **Toolkits** and **Checklists** with clear step by-step guidance steps to support businesses to embed what they learn in our training
- **Template policies** (Responsible Sourcing, Anti-Discrimination, No Child Labor etc.) and procedures (Response procedure etc.)
- **Worker information posters** in multiple languages
- Award winning, awareness raising **videos**
- Bespoke resources can be developed

Find out more and download **for free** here: [www.stronger2gether.org/resources](http://www.stronger2gether.org/resources)

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together**



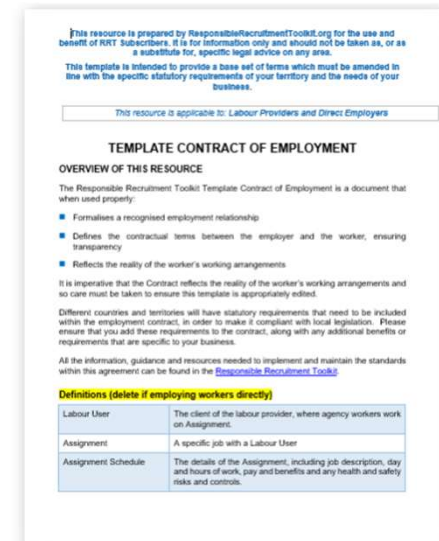
# Resources – Responsible Recruitment and Fair Work



[General Principles and operational guidelines for fair recruitment](#)



[Responsible Recruitment and Fair Work Policy Template](#)



[Contract of Employment template](#)

# Resources – Recruitment Fees and Wages

**IRIS**  
International Recruitment Integrity System

**ILO Definition of Recruitment Fees and Costs: For employers to cover**

**Recruitment Fees** Covers recruitment, referral and placement services that can involve advertising, disseminating information, arranging interview, submitting documents for government clearances, confirming credentials, organising travel and placement into employment.

Medical Costs	Insurance Costs	Skills & Qualifications	Training and Orientation	Equipment Costs	Travel and Lodging	Administrative Costs
<ul style="list-style-type: none"> <li>Medical examinations</li> <li>Tests</li> <li>Vaccinations</li> </ul>	<ul style="list-style-type: none"> <li>Mandatory government insurance</li> <li>Health and safety of workers</li> <li>Enrolment in Migrant Welfare Funds</li> </ul>	<ul style="list-style-type: none"> <li>Language proficiency tests</li> <li>Skills and qualifications tests</li> <li>Certification or licensing</li> </ul>	<ul style="list-style-type: none"> <li>Mandatory training</li> <li>Pre-departure and post-arrival training</li> <li>On-site training</li> </ul>	<ul style="list-style-type: none"> <li>Tools</li> <li>Uniforms</li> <li>Safety gear</li> </ul>	<ul style="list-style-type: none"> <li>Including for training, interviews, consular appointments</li> <li>Relocation</li> <li>Return or repatriation</li> </ul>	<ul style="list-style-type: none"> <li>Application and service fees</li> <li>Employment contracts, passports, IDs, visas, background checks, security &amp; exit clearance, banking services, work &amp; residence permits</li> </ul>

**IOM**  
U.S. Department of Homeland Security

1 / 2

ILO Definition of Recruitment Fees and Costs for employers to cover.

Reasonable costs for workers to cover

**RECRUITMENT FEES POLICY TEMPLATE FOR THE U.S.**

This is a template to be modified as required. It is for information purposes only and should not be a substitute for specific legal advice in any area. Any resources should be reviewed and adjusted to each business and aligned with their overall management system before use. Pay particular attention to reviewing and updating the highlighted text. There may be provisions that do not apply to your business.

**[ON HENT BUSINESS NAME] RECRUITMENT FEES POLICY TEMPLATE**

**[Insert Business Name]** is committed to ensuring no recruitment fees or related costs are paid by workers, and where evidence of fee-charging is discovered, effective remediation is ensured, including repayment.

We define recruitment fees and related costs according to the ILO Definition as set out in Appendix 1.

**SCOPE**

This policy applies to the application, recruitment, and subsequent employment/engagement of any worker recruited by **[Insert Business Name]** and its business partners in the supply chain, including **[This may define related businesses that are not relevant]**

- Suppliers and Service Providers
- Labor Providers (for example, a Farm Labor Contractor (FLC) may recruit and/or manage labor)
- Labor Recruiters (for example, a foreign labor recruiter that only recruits)
- Recruitment intermediaries and sub-agents
- Organizations that provide services for workers during recruitment and employment, e.g., health centers, insurance providers, visa processing providers, travel agents, housing providers, dormitory providers, translation agencies, accommodation agents and any other relevant business partners
- Labor/Client/employer clients

**[Insert Business Name]** will include the principles and terms of implementation of this policy in all contracts and service level agreements with all supply chain business partners, with sanctions in case of violation.

**POLICY PRINCIPLES**

- Employer Pays Principle:** No worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer
- Remediation of Recruitment Fees:** If it is discovered that workers have paid recruitment fees effective remedy is ensured, including compensation, rehabilitation and satisfaction and guarantee of non-repetition as appropriate

**POLICY COMMITMENTS**

**Employer Pays Principle**

**[Insert Business Name]** and its business partners commit to:

- Directly paying recruitment fees or related costs where possible. Where not possible, or where the worker is legally required to pay a fee or cost directly, helping the worker as soon as practicable or required. See Appendix 2 for M24 guidance
- Ensuring effective systems are in place to maintain records demonstrating that all recruitment fees and related costs have been paid by our business and any business partners involved at every stage in the recruitment process and not by the worker
- Ensuring recruitment fees or related costs are not charged directly or indirectly to workers. "Indirectly" in this context means not:
  - Charging workers for purportedly optional services, which are, in fact, integral to the recruitment process.
  - Making providing recruitment services conditional on the worker using other services or hiring or

No Recruitment Fees Policy Template

**FORUM** **AIMprogress**

**Guidance on the Repayment of Worker-paid Recruitment Fees and Other Related Costs**

Dynamic Draft Developed by the Human Rights Coalition – Working to End Forced Labour and AIM-Progress

[www.tcgfsocial.com](http://www.tcgfsocial.com)

OCTOBER 2022

Guidance on the Repayment of Worker-paid recruitment feed and Other Related Costs

**Impactt**

About Services Industries Reports Insights Get

**Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs**

Over the last four years Impactt has worked with partners to facilitate the repayment of recruitment fees to over 88,000 migrant workers employed by 210 companies, across 12 countries. We've used this experience to develop a set of Principles and Guidelines for the Repayment of Recruitment Fees and Related Costs.

Click below to jump to a specific section of the document

Introduction	Key Considerations
Guidelines	Further Resources

**Principles and Guidelines for the Rectification of Non-Payment of Wages**

June 2023 Version 1

**Impactt**  
making a world of good for everyone and not just some

Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs

Principles and Guidelines for the Rectification of Non-Payment of Wages

# Spotlight – TISC Statutory Guidance

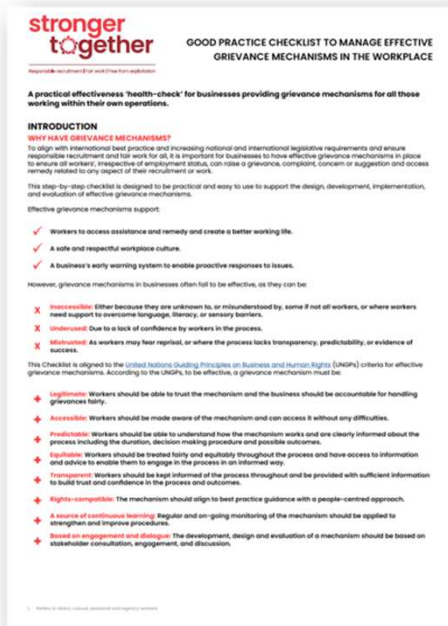


**"Companies should follow the Employer Pays Principle: No worker should pay for a job. The costs of recruitment should be borne not by the worker but by the employer and prohibit the charging of recruitment fees to workers across their operations including supply chains".**

It lists a range of due diligence measures to tackle irresponsible recruitment practices:

1. Prohibit the charging of recruitment fees to workers in their supply chains or operations, in line with the Employer Pays Principle
2. Integrate safeguards into company policies and procedures
3. Raise awareness and build capacity of staff responsible for recruitment and buying teams to understand the risks of debt bondage connected to recruitment
4. Screen and evaluate key recruitment agencies/labour providers
5. Monitor recruitment processes throughout the company's supply chains and operations
6. Undertake corrective action plans, including repayment of fees to workers, when issues are identified
7. Develop an action plan to make system improvements in recruitment practices
8. Participate in multi-stakeholder initiatives to make a wider impact on responsible recruitment

# Resources – Grievance Mechanisms



Good Practice Grievance Mechanism Effectiveness Checklist

**INVESTIGATION CHECKLIST** **RRT RESPONSIBLE RECRUITMENT TOOLKIT.ORG**

Investigator name: \_\_\_\_\_ Job title: \_\_\_\_\_

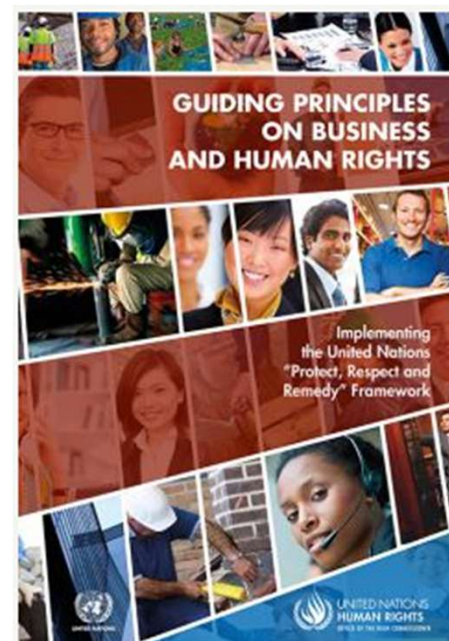
Investigation title: \_\_\_\_\_

Investigation description: \_\_\_\_\_

ACTION	STATUS
<b>Prior to commencement of investigation</b>	
1. The Investigating Manager confirms that they have the knowledge and skills required to carry out the investigation in a timely, professional and unbiased manner.	
2. Review appropriate business policies and procedures e.g. Health and Safety, Responsible Recruitment, Grievance, Worker Representation. To determine whether they offer guidance or direction to the investigation. Consult with HR specialist if required.	
3. Identify what evidence might need to be gathered and how to get it e.g. CCTV footage or recordings, emails or other documents and witness statements.	
4. Identify the 'Deciding Manager' who will receive the investigation Report and who will determine the outcome and remediation based upon the findings.	
5. Identify all witnesses and others (such as technical experts) who are not directly involved but can add insight; who will need to be interviewed and in which order and prepare an outline of questions to ask each individual.	
6. Make out a timetable for the investigation and report writing to ensure that the process is conducted in a timely manner that best serves the particular circumstances of the matter.	
7. If an individual is under investigation, inform them of the issue they are under investigation for, the date on which the investigation meeting will take place, their right to be accompanied and ensure they have a copy of the relevant procedures.	
<b>Handling an investigation meeting</b>	
8. Arrange interpretation to support communication, where necessary. Any interpreter should have the knowledge and skills and/or have received training to provide accurate interpretation (playing only what has been said by each party) and remain independent (in no way influencing conversations).	
9. Invite HR staff member or other manager to the meeting to take notes and assist with investigation.	
10. Prepare a set of questions based on evidence and information available.	
11. Interview individuals in a location free from interruptions, e.g. phone calls, where the interview will be kept confidential and others individuals feel comfortable.	
12. Introduce those present and outline their roles.	
13. Inform the interviewee of the incident under investigation for which the investigation is necessary.	
14. Confirm that copies of the statement and/or notes will be issued to the other parties involved in the case.	
15. Where appropriate, offer the witness the opportunity to write a statement of events (or write on their behalf using the investigation Statements/Notes form (see appendix)). Ensure completion is in ink, that amendments are initialed (do not use correction fluid), close a line through unused parts of the form and ensure each page is signed and dated.	
16. Where a statement of events is not appropriate, conduct the meeting asking relevant questions and noting answers.	
17. If necessary, adjourn the meeting. Review the evidence highlighting any issues that are vague or incomplete. Update the prepared list of questions and recommence the meeting. Repeat the step until you are satisfied that you have all the relevant information from the interview.	
18. Ask any final questions and allow the interviewee to add any other comments to the investigation.	
19. Summarise the discussion, gain agreement to this and conclude the investigation meeting.	

Website: [responsible-recruitment-toolkit.org](http://responsible-recruitment-toolkit.org) Email: [info@responsible-recruitment-toolkit.org](mailto:info@responsible-recruitment-toolkit.org) Phone: +44 (0) 1276 953090

Internal Investigation Checklist



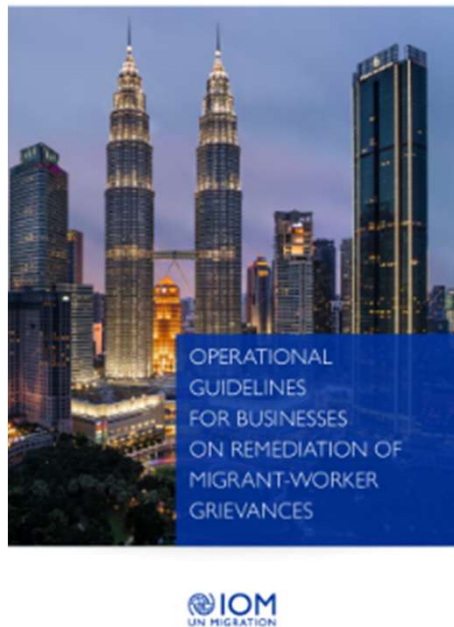
Guiding Principles on Business and Human Rights

UNGP's Effectiveness Criteria:

- ✓ Legitimate
- ✓ Accessible
- ✓ Predictable
- ✓ Equitable
- ✓ Transparent
- ✓ Rights-compatible
- ✓ Source of continuous learning
- ✓ Based on engagement and dialogue



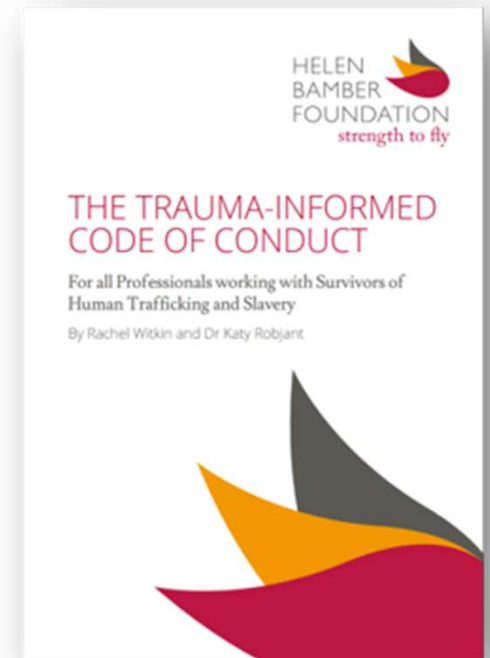
# Resources – Response and Remediation



[Operational guidelines for Business on Remediation of Migrant Worker Grievances](#)



[Modern Slavery Core Outcome Set](#)



[The Trauma-Informed Code of Conduct](#)



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Responsible recruitment | Fair work | Free from exploitation

**Assess, progress and  
demonstrate**

# Our **Assessment and Verification** tools



The RRT Online Tool is an unparalleled online capacity building tool to help businesses understand, achieve and demonstrate responsible recruitment.



Stronger Together's Fast Forward programme is a next-generation audit and improvement programme that works for all suppliers and service providers, in all sectors, at all stages of their social compliance journey.



## **Organisational Progress Assessment**

An OPA is a two-day supportive and participatory assessment analyses gaps, reports your business' strengths and provides you with detailed recommendations and action plans to support your organisational improvement.



# Self-assessment and checklists

**stronger together**  
Building modern slavery in supply chains

**Employer Good Practice Implementation Checklist**

The following good practice form a number of the steps an employer may take to ensure that slavery and human trafficking is not taking place in its own business and include in their statement for the Modern Slavery Act Transparency in Supply Chains reporting provisions.

Company Name   
Completer Name  Email

**Scoring System**  
0 = If not implemented/don't know, 1 = If partially implemented, 2 = If fully implemented, N/A = Not applicable

**1. COMMIT to tackle modern slavery risks in your business**

**Score requirement and risk definition**

1. A member of the most senior management level within your business has been ensuring robust slavery standards are applied and for protecting the human (direct and agency workers). This includes a specific responsibility for prevention risks.

2. A multi-departmental team has been appointed to coordinate and oversee the diligence steps to address the risks of modern slavery and hidden labour exploitation.

3. A site "Modern Slavery Lead" has been appointed to lead the implementation address the risks of modern slavery and hidden labour exploitation.

4. Your site has established a "Workforce Incident Management Team" including are able to respond to such issues during all operating hours.

5. A remediation team has been appointed to deliver the remediation programs include representations from the workforce, managers, trade unions (if active in NGOs with expertise in modern slavery where available).

6. A "Modern Slavery Champion" has been appointed to maintain peer engagement modern slavery and hidden labour exploitation within the general workforce.

7. The individual roles and responsibilities of HR and payroll team, Department/ Management team members, Investigating Managers, Trade Union / Employee support operational due diligence steps addressing exploitation risks have been defined and communicated.

8. The role and responsibilities of supervisors and team managers in spotting the handle and report suspected cases have been explicitly defined and communicated.

**Section 2 - Good Practice Implementation Checklist**

9. Your business has developed and implemented a "Tackling Modern Slavery in which details the processes it will take to prevent these practices and the steps (see Appendix 1).

10. Your business has developed and implemented a "Responsible Recruitment Policy" (see Appendix 2).

11. Your business can demonstrate that its anti-slavery and corruption policies are robust.

12. Managers, supervisors and recruiters have been issued written notification that to recruit or source workers or to control any form of physical or mental work harassment is prohibited and will be investigated as a potential gross misconduct.

13. A "Workforce Incident Reporting Procedure" has been developed for senior managers to report suspected cases of exploitation and unfair treatment. This is abusive behavior, bullying, bribery, corruption, discrimination, harassment, a hidden labour exploitation. Your business can demonstrate that colleagues are management record and deal with reports appropriately.

14. There is an established system in place to be able to rapidly conduct background checks.

**Labour Provider/Recruitment Business Good Practice Implementation Checklist**

The following good practice form a number of steps a labour provider or recruitment business may take to ensure that slavery and human trafficking is not taking place in its own business and include in their statement for the Modern Slavery Act Transparency in Supply Chains reporting provisions.

Company Name  Site   
Completer Name  Email  Date

**Scoring System**  
0 = If not implemented/don't know, 1 = If partially implemented, 2 = If fully implemented, N/A = Not applicable

**1. COMMIT to tackle modern slavery risks in your business**

**Score requirement and risk definition**

1. A member of the most senior management level within your business has been made explicitly accountable for ensuring robust slavery standards are applied and for protecting the human rights of those working in the business. This includes a specific responsibility for preventing and addressing modern slavery risks.

2. A senior manager has been appointed as the business "Modern Slavery Lead", to lead the implementation of operational due diligence steps to reduce and address the risks of modern slavery and hidden labour exploitation throughout your business.

3. A multi-departmental team has been appointed to coordinate and oversee the implementation of operational due diligence steps across your business to address the risks of exploitation.

4. Managers of each branch and site where agency workers are deployed, have been appointed to lead the implementation of operational due diligence steps to address the risks of exploitation.

5. A "Workforce Incident Management Team" has been appointed, including "Investigating Managers", that is ready to respond to serious workforce issues during any hours agency workers are deployed.

6. A remediation team has been appointed to deliver the remediation programme for your business. The team should include representatives from the workforce, managers, trade unions (if active in the workplace), specialists and local NGOs with expertise in modern slavery where available.

7. A "Modern Slavery Champion" has been appointed to maintain peer engagement and raise awareness of modern slavery and hidden labour exploitation within the general workforce.

8. The individual roles and responsibilities of HR and payroll, Department/Functional Heads, Workforce Incident Management team members, Investigating Managers, Trade Union / Employee Reps, and Welfare Officers, to support operational due diligence steps addressing exploitation risks have been defined and communicated to the senior colleagues.

9. The role and responsibilities of recruiters and consultants in spotting the signs of exploitation and how to handle and report suspected cases have been explicitly defined and communicated to them.

**Section 2 - Good Practice Implementation Checklist**

10. Your business has developed and implemented a "Tackling Modern Slavery and Hidden Labour Exploitation" policy which details the processes it will take to prevent these practices and the steps it will take where they are identified. (see Appendix 1).

11. Your business has developed and implemented a "Responsible Recruitment Policy" (see Appendix 2).

12. Your business can demonstrate that its anti-slavery and corruption policies are agreed, applied, and complied with.

13. Your business charges clients a sufficient rate to cover statutory wage factors, overhead costs, account servicing costs plus a sustainable net margin that allows your business to meet its obligations with regard to achieving robust labour standards practices and for reducing and addressing modern slavery and hidden labour exploitation risks.

14. Your business can demonstrate that it has issued its managers, supervisors and recruiters with written notification that recruiting brokers or intermediaries to recruit or source workers or to control any form of physical or mental work harassment, corruption, bribery or harassment is prohibited and will be investigated as a potential gross misconduct offence (see Appendix 2).

Employer Good Practice Implementation Checklist

Labour Provider Implementation Interactive Checklist

This resource is prepared by the Responsible Recruitment Toolkit for the use and benefit of RRT Subscribers. It is for information only and should not be taken as or as a substitute for, specific legal advice or any other.

This resource is applicable to users of labour recruitment/provision/intermediaries.

**RRT RESPONSIBLE RECRUITMENT TOOLKIT**

**LABOUR SUPPLY CHAIN DUE DILIGENCE CHECKLIST**

With a growing focus on human rights due diligence, labour supply chain due diligence is a critical component of managing risk and liability. By carrying out effective labour supply chain due diligence, a business can prevent exploitation during the recruitment process. By taking proactive steps to work ethically with labour supply chain partners, businesses can improve labour sourcing and retention and benefit from mutual reputational opportunities.

Use this quick checklist as a guide to conduct due diligence on labour recruiters/provision/intermediaries in your labour supply chain. The document is interactive. Click on the progress status column to update your status. Further guidance available on the [Responsible Recruitment Toolkit \(RRT\)](#) is appended throughout.

No.	Requirement	Guidance on how to implement	Progress Status
1-5	We have a responsible recruitment policy which includes commitments to labour supply chain due diligence. We regularly communicate to and train staff and our labour recruiters/provision/intermediaries on our requirements and standards for candidates.	RRT Step C3-E	N/A
6a	We have an on-site data team of our labour supply chain, identifying all businesses and individuals involved at all stages of recruitment and the relationships between them, including any providing indirect services such as insurance or travel arrangements.	RRT Step C4	N/A
6b	We interview workers to identify the supply chain partners that our about jobs and whether there is any evidence of hidden or unauthorised individuals/businesses involved in the recruitment process.	RRT Step C4	N/A
7a	Before authorising services from any labour recruiters/provision/intermediaries, we verify that they operate:	RRT Step C5	N/A
7b	As a legitimate business entity including that:		
	• They are appropriately registered and licensed with state authorities		
	• They have the necessary resources in place		
	• They are not being liquidated (declared bankrupt)		
	• Their directors are fit and proper i.e. they have no legal proceedings related to labour/human rights where against them, the business or any associated businesses, they have not been disqualified from business ownership and they are not connected to a pattern of irregular/illegal businesses.		
	• In accordance with legal requirements and our responsible recruitment policy through audits and/or self-assessments as part of the tender process.		
8a	Authorised labour recruiters/provision/intermediaries are added to a regularly updated Authorised Partners Register, which lists the verified businesses that relevant staff can use to recruit and/or supply workers or provide any other related services.	RRT Step C5	N/A
6	Before authorising services from any labour recruiters/provision/intermediaries, we negotiate and sign a written legal contract and operational service level agreement.	RRT Step C6	N/A
7	Before authorising services from any labour recruiters/provision/intermediaries we confirm written authorisation from the relevant client to use them.	RRT Step C7	N/A
8	We carry out appropriate ongoing due diligence with all labour recruiters/provision/intermediaries and take proactive steps to address issues where they are identified. Due diligence may include:	RRT Step C8	N/A
	• Regularly communicating our responsible recruitment expectations and requirements		
	• Regularly requesting the pre-appointment checks (see 6a)		
	• Requiring that they complete a self-assessment to demonstrate responsible recruitment practices and continuous improvement		
	• Independent audits of their responsible recruitment practices		
	• Overseeing the recruitment of workers undertaken by labour recruiters/provision/intermediaries		
	• Ensuring that workers can easily report confidentially any complaints or concerns related to our business		
	• Regularly interviewing a sample of workers to understand whether they have any complaints or concerns with the labour recruiter/provision/intermediary		

Labour Supply Chain Due Diligence Checklist

Good Practice Checklist to Manage the Impact of Extreme Heat in the Workplace- Indoor and Outdoor

**stronger together**  
Responsible Recruitment for work sector education

**Good practice checklist to manage the impact of extreme heat in the workplace Indoor and Outdoor Workplaces**

**INTRODUCTION**

Workers exposed to extreme heat can be at risk of heat stress, which can result in occupational illnesses and injuries, threatening responsible recruitment practices and the availability of hot work.

Heat stress happens when the body's internal regulation mechanisms can no longer maintain body temperature at a level required for normal functioning. Factors contributing to heat stress are air temperature, heat sources or contact with hot objects, work rate, high humidity, work clothing, PPE, and demanding physical activities.

Heat stress can occur indoors and outdoors, and it can be manifested in different symptoms, including muscle cramps, severe thirst, fainting, heat exhaustion, heat stroke, and, in extreme cases, death. In the long term, it can also worsen chronic conditions such as cardiovascular, respiratory, and endocrine/metabolic diseases, diabetes-related conditions, mental disease, stroke and mental health.

According to the [2021 IPCC report](#), with further warming, every region is projected to experience heat waves more frequently. Moreover, climate change is projected to increase the severity of heat-related health outcomes, leading to affect, above all, vulnerable workers.

Businesses that proactively manage the effects of heat on workers can benefit from higher productivity and reduced risk of occupational injuries and illnesses.

This good practice checklist provides practical steps to support your business in managing the impact of extreme heat in the workplace and to ensure that working arrangements and conditions keep workers safe, in accordance with relevant legislation and industry best practice.

Further guidance to embed responsible recruitment practices and to ensure work conditions are safe and hygienic are available on the [Responsible Recruitment Toolkit \(RRT\)](#).

**GUIDE**

1. Appoint a relevant team member to coordinate the checklist's completion and ongoing monitoring; where relevant, one checklist per operational site should be completed.
2. Assess your business's progress against each step, consult relevant colleagues, functions, and departments from across your business/site as necessary.
3. Develop a plan to implement the steps that your business does not currently implement or considers can be improved.
4. Review performance on an annual basis.

Note: This checklist has been designed to apply globally to various industries. For instance, it does not present industry/ country-specific elements and shouldn't replace other health and safety guidance.

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**stronger together**

 [info@stronger2gether.org](mailto:info@stronger2gether.org)

 [www.stronger2gether.org](http://www.stronger2gether.org)

 [/stronger-together/](https://www.linkedin.com/company/stronger-together/)

**Thank you!**

# Useful resources on Responsible Recruitment

Impactt

Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs



[Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs, Impactt](#)

<https://aim-progress.com/resource/guidance-on-the-repayment-of-worker-paid-recruitment-fees-and-related-costs>



General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs

[General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs, ILO](#)

[IHRB – Recruitment Fees – Remediating worker paid recruitment fees](#)

[Thailand Bound: An Exploration of Labor Migration Infrastructures in Cambodia, Myanmar, and Lao PD. Funded by Humanity United and Freedom Fund](#)

[A study into the implementation of responsible recruitment practices and the Employer Pays Principle \(EPP\) in the global tuna processing sector, Impactt](#)

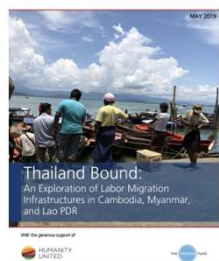


Responsible Recruitment: Remediating Worker-Paid Recruitment Fees



A study into the implementation of responsible recruitment practices and the Employer Pays Principle (EPP) in the global tuna processing sector.

Impactt



# FNET Business Case on Responsible Recruitment



## Responsible Recruitment – Business Case

V1

February 2023

The following document outlines the importance of implementing responsible recruitment principles in [insert company name] own-operations and supply chains.

### Context

According to the International Labour Organization, more than 252 million people across the globe live outside their countries of origin, and migrant workers and their families account for 90 percent of all international migration. Such movement of workers has become increasingly important to the prosperity of the global economy, and to the livelihood of individual workers seeking opportunity. Unfortunately, as more individuals move for work, and more employers seek global talent, many migrants find themselves entangled in a “gray” market run by unscrupulous recruiters and employers. As a result, they can face abusive conditions that amount to modern-day slavery<sup>1</sup>.

### Responsible recruitment principles

To prevent the risk of modern slavery occurring and ensure migrant workers are adequately protected, it is essential that we support our suppliers create fair and transparent recruitment supply chains. Known as responsible recruitment, this means ensuring:

- Migrant workers are supplied with the necessary information pre-departure to make an informed decision about a potential job opportunity.
- The job offered is the same as the job provided.
- Workers do not pay any recruitment fees and costs, in line with the ILO definition of recruitment fees.

### Our commitments/Customer requirements

[Insert name of company/our customers] are already committed to a number of international principles that promote responsible recruitment including:

- The ETI Base Code 1.1 that requires ‘There is no forced, bonded or involuntary prison labour’.
- International Labour Organization (ILO) Core Conventions which call for ‘the elimination of all forms of forced or compulsory labour’.
- The Consumer’s Goods Forum’s Priority Industry Principle that requires ‘No worker should pay for a job’.
- The “Employer Pays Principle that requires ‘that, no worker should pay for a job, the cost of recruitment should be borne not by the worker but by the employer.’

[Our customer’s requirements outline the expectation that we too align with these principles with compliance a condition of supply].

### Legal requirements

Under the UK Modern Slavery Act companies with a turnover of over 36 million are required to report annually the steps they are taking to mitigate the risk of modern slavery occurring in their business and supply chains. The most common indicator of modern slavery within our supply chains is the payment of recruitment fees. Although the UK law permits some fees and costs associated with recruitment, it is the expectation of [our customers/stakeholders] that we will work proactively to eradicate these fees.

<sup>1</sup> Source: Verite - <https://verite.org/project/responsible-recruitment/>



V1

February 2023

For UK companies which conduct a significant amount of business in the EU the EU Mandatory Environmental and Human Rights Due Diligence Law<sup>2</sup> also requires they carry out effective due diligence with respect to potential or actual adverse impacts on human rights in own operations and business relationships (supply chains).

From an international human rights perspective, the International Labour Organisation (ILO)<sup>3</sup> recognizes the principle that workers shall not be charged directly or indirectly, in whole or in part, any fees or related costs for their recruitment.

### Reputational risk

In recent years there has been increasing attention on migrant worker welfare in the UK media, this has particularly focused on excessive recruitment fees paid by migrants in Malaysia and UK fishing and agriculture. Those associated with these supply chains have been criticised for not only allowing these practices to occur while also benefiting from them. There is an increasing reputational risk for companies who are not seen to be proactively addressing this issue.

<sup>2</sup> EU mandatory due diligence [Corporate sustainability due diligence \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023L1013)

<sup>3</sup> ILO [General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](https://www.ilo.org/public/english/standards/declaration/1998/declaration.htm)

# Principles for Remedy

[DRAFT Dec 24 RR WG - Remedy Guidance.docx](#)

## **DRAFT – Criteria for remediating recruitment fees through reimbursement**

*Disclaimer: This document is intended for guidance ONLY. It is not intended to create a set of binding criteria that FNET and working group members are expected to adhere to. It is intended to suggest from criteria which members may choose to consider when implementing their own responsible recruitment approaches.*

*N.B This document is not intended to duplicate existing resources e.g. Impactt remediation principles, which offer a detailed guide on WHAT and HOW businesses should reimburse recruitment fees. It has been developed as part of a roadmap of activity requested by working group members to help them ‘take one step forward’ in their responsible recruitment journeys.*

*This document can be considered alongside the ‘safe space’ and ‘phased approach’ guidance also created by this group, but any of these documents can also be used by members individually in any way they see fit for their business.*





# Principles for Remedy

[DRAFT Dec 24 RR WG - Remedy Guidance.docx](#)

Developed last year

Independent verification?

Return to this

## Principles for Remedy

Timely	Prioritises the most vulnerable workers	Clearly communicated	Conducted in parallel with strengthening recruitment practices	Considers sharing good practice with industry
				

# Working Group 2025 Plan

# Responsible Recruitment Working Group

*Potential member commitment: Public commitment to responsible recruitment principles and transparently report progress on risks, approach and remediation.*

## Summary

- Align with other stakeholders to drive progress across the sector ensuring members have access to and knowledge of available resources and case studies. Use the resources to ensure members move forward on RR

## Outputs:

- Survey WG members to drive priorities for the Working Group Plan
- **Action** – Embedding Phased Approach and Principles for Remedy in FNET member operations
- **Knowledge Sharing** - Signpost members to the resources produced and available within FNET and other organisations. Share case studies where members have made progress. Members to provide the case studies
- **Data Gathering** - Align to reduce duplication and pool resources with other RR stakeholders including AIM Progress/IHRB and Stronger Together to drive a better view of risk
- **Contribute** - to research work with Johnson and Johnson/Impactt to provide data on high-risk Corridors with member input, to help them develop a risk assessment dashboard (external funding)
- **Guidance** - Develop CAR remediation plan for Responsible Recruitment issues from SMETA 7

### Working Group Leads



Rachel Munns,  
World Wise Foods



Courtenay Forbes,  
Tesco

### Board representative



Sam Ludlow-Taylor,  
Waitrose

PM: Jessica Turner

# Responsible Recruitment Working Group

**Group Objectives :** Support engagement and embed Guidance from FNET and beyond to what Commitment to Responsible Recruitment Means. Operationalise Effective RR. Share Good Practice Models of Remediation of Recruitment Fees, so members can make progress on adopting responsible recruitment principles

## Planned Activity and Outputs

### Q1 – FNET MEETING May 2025

- Share the WG activity for 2025/26
- Members start to Embed the Phased Approach with the Principles of Remedy
- Share case studies on Good Practice in RR
- Signpost members to existing resources

### Q2 – STAKEHOLDER MEETING

- Insights from FNET benchmarking
- Share SMETA CAR report issues and develop CAR Remedy
- Collaboration & Strategy alignment with other multistakeholder initiatives

### Q3/Q4 – FNET MEETING – Oct In person

- Members invited to share how use of the RR resources developed in 2024 has enabled progression towards Fair & Transparent recruitment, and business adopting Responsible Recruitment practices
- Members agree to reporting progress – Progress can take many forms.

**Expected member actions /Impact measures:** Members actively participate in Working Group and agreed to start monitoring progress of risks, approach and remediation for responsible recruitment practices. Members share best practice case studies to aid learning.

**Budget required - £3000**