

STRONGER TOGETHER

RESPONSIBLE RECRUITMENT PROGRESS ASSESSMENT

GENERAL REGULATIONS

Issue 1

1. Introduction

1.1 Background

Stronger Together has developed a **Responsible Recruitment Progress Assessment (RRPA)** to enable labour providers/recruiters and the intermediaries in their labour supply chain, to independently verify progress in implementing responsible recruitment good practice steps and to continuously improve through access to guidance, resources and training. These General Regulations set out the processes and protocols to ensure the effective and consistent delivery of **Responsible Recruitment Progress Assessments**.

Following an initial pilot in the Skilled Worker route in the UK, the RRPA will be tested in the UK Seasonal Workers' Scheme as one of a number of actions identified to help mitigate risks of worker exploitation and to drive continuous improvement in responsible recruitment. The methodology is developed to work for any UK labour provider (and its labour supply chain) whether recruiting domestically, internationally or both.

The RRPA is a deep-dive, consultative and supportive continuous assessment aligned to the good practice steps in the [Responsible Recruitment Toolkit](#) to help:

- Identify implementation performance levels, management system gaps and improvement recommendations to strengthen implementation of responsible recruitment and support effective organisational change on a continuous improvement basis
- Review grievance mechanisms available and worker experience to ensure the views and voices of workers, especially workers at heightened risk of vulnerability, are effectively captured, and if issues are identified, provide response and remedy.

The RRPA independently reviews:

- UK labour providers' practices in relation to sourcing and recruiting workers, and where relevant when procuring any intermediaries used in the labour supply chain
- How the labour provider calculates the charge rates agreed with clients and with intermediaries to determine if they are sustainable and cover all costs of recruitment
- Testing of in-country recruitment either:
 - (Where overseas agents are used) A sample of at least one overseas intermediary to test the effectiveness of labour supply chain due diligence and if in practice responsible recruitment standards can be demonstrated in the labour supply chain
 - (Where all recruitment is done directly) A sample of at least one in-country team's application of responsible recruitment and/or oversight of UK staff in-country recruitment

The RRPA is intended to:

- Be an assessment that labour providers can share with all labour user clients and their end-customers (e.g. UK retailers) to help reduce audit duplication
- Act as a pathway to industry certification (e.g. Clearview, IOM IRIS) to help support differentiation in the marketplace

1.2 Scope

The scope of the RRPA covers the recruitment process of the labour provider and the effectiveness of due diligence throughout the labour supply chain down to any intermediaries. The review of employment practices either by the labour provider or labour user is not in scope. However, the assessment does look at due diligence undertaken by the labour provider/recruiter on the labour user e.g. to determine if working conditions are consistent with what has been communicated to workers during recruitment, and if there are effective grievance mechanisms throughout employment.

1.2 RRPA Process Overview

A Responsible Recruitment Progress Assessment follows a five-stage continuous improvement process, as outlined in the table below. Further details are provided in Section 3.

<p>COMPANY APPLICATION</p> <p><i><u>8-6 weeks before assessment</u></i></p> <p>See Section 3 for details</p>	<ul style="list-style-type: none"> • Submission of pre-assessment scoping information including domestic and international recruitment process and labour supply chain mapping • Selection of Recruitment Intermediary and Labour User Client Sites for on-site assessment based on risk assessment by Stronger Together • Selection of consultant(s) to deliver assessment • 6 weeks in advance: Kick-off call (Stronger Together, Labour Provider, Intermediary and Consultant)
<p>PRE-ASSESSMENT</p> <p><i><u>6-1 weeks before assessment</u></i></p> <p>See Section 4 for details</p>	<ul style="list-style-type: none"> • 4 weeks in advance: submission of self-assessment on RRT, uploaded evidence and key supporting documents (Labour Provider and where relevant Intermediary) • 4 to 2 weeks: review of pre-assessment information (Consultant) • 2 weeks in advance: planning call (Labour Provider, Intermediary and Consultant) • 1 week in advance: assessment itinerary finalised
<p>ASSESSMENT</p> <p>See Section 5 for details</p>	<ul style="list-style-type: none"> • UK labour provider Head Office assessment: central policies and procedures, central management interviews – 1 day • UK labour user 2 clients’ sites sampled to interview workers once on the farm – 2 days • Intermediary Head Office/In-country team assessment: central policies and procedures, central management interviews, operational documentation review – 1 day • Jobseeker interviews – must be timed when jobseekers are in the Intermediary/In-country team office anyway for processing so that they are not making extra trips for the interviews – 1 day
<p>REPORT PRODUCTION AND ISSUE</p> <p><i><u>Final reports issued within 15 working days of the assessment</u></i></p> <p>See Section 6 for details</p>	<ul style="list-style-type: none"> • Consultant sends draft reports within 5 working days to S2G • S2G quality review – 3 working days then issued to LP and RI • LP and RI have 3 working days to respond • Final reports issued after further 4 working days • Where relevant: client escalation and response (see 6.3)

<p>FOLLOW-UP AND CONTINUOUS IMPROVEMENT</p> <p>See Section 7 for details</p>	<ul style="list-style-type: none"> • Agreed improvement period and re-assessment schedule depending on findings • Ongoing communication on progress between parties in the supply chain • Training and support available through the RRT online tool, training courses and resources
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1.3 Glossary

Approved Consultants – consultants which have been approved by Stronger Together to deliver the RRPA in line with these General Regulations.

Assessment – The Stronger Together Responsible Recruitment Progress Assessment.

Assessment tool – Responsible Recruitment Toolkit self-assessment and downloadable CSV which forms the content for the assessment report.

Assessment owner – Stronger Together is the Assessment Owner and is responsible for the management and technical development of the assessment.

Authorised agents – Associates contracted to work on Stronger Together’s behalf

Labour Provider (LP) A business responsible for recruiting workers and supplying them on a temporary basis to an end client i.e. Labour User.

Labour Recruiter (LR) - A business responsible for recruiting workers who will then be directly employed/engaged by another business.

Labour User - A business that employs or uses workers sourced or supplied by a Labour Provider/Recruiter.

Labour Supply Chain

Recruitment Intermediary (RI) - Offers recruitment services for a Labour Provider/Recruiter. There may be several Recruitment Intermediaries in a labour supply chain.

Reports – The assessment reports produced from the RRPA (see Section 6.1):

- The RRPA Full Assessment report
- The RRPA Report for Customers
- The RRPA Forced Labour and Critical Issues Record

UN Guiding Principles on Business and Human Rights (UNGPs) - A set of guidelines to prevent, address and remedy human rights abuses in business operations and supply chains.

1.4 Governance

Stronger Together is the **Assessment Owner** and is responsible for the management and technical development of the assessment. The Assessment Owner has appointed a number of employees and associates that support the development and management of the assessment.

1.5 Language

English is the reference language for all Assessment documents. Translations into other languages may be undertaken at the discretion of the Assessment Owner in order for the translation to become official documents. These translations remain the intellectual property of Stronger Together.

1.6 Current Assessment documents

The current version of the Assessment documents are:

- The General Regulations (this document)
- Responsible Recruitment Toolkit self-assessment steps
- Assessment operational documentation

Labour providers and approved consultants engaged in RRPAs are expected to be aware of the obligations as defined within these General Regulations and have responsibility for ensuring that they are using the most up to date issues of the Assessment documentation.

The Assessment documents are a set of standardised documentation for use during the Assessment and therefore they should not be amended or adjusted by consultants. However, stakeholders are encouraged to advise Stronger Together of any suggestions for improvement.

1.7 Confidentiality and Data Protection

The Assessment will, where appropriate, comply with and use all reasonable endeavours to ensure compliance by its authorised agents with the requirements of the UK Data Protection Act 2018 (as amended), data protection legislation in countries where the Programme is used and any relevant updates affecting any information held or stored concerning their activities.

Stronger Together and its authorised agents will treat in confidence all information obtained on businesses during the Programme, other than that which is in the public domain or unless otherwise required to do so by law.

1.8 Programme Logo Usage and Trademark

The Assessment is not a certification scheme so neither the Stronger Together nor Responsible Recruitment Toolkit logo should not be used to suggest any certification or accreditation. Any use of any Stronger Together logos (e.g. in marketing materials) should be approved by Stronger Together.

The Stronger Together logos are trademarked, shall not be altered in any way and remain the property of Stronger Together.

1.9 Disclaimer and Copyright

Information and expressed opinions are made in good faith, but Stronger Together will accept no liability for any error or misinterpretation of any such information contained in this document.

Whilst Stronger Together has endeavoured to ensure that the information in the Assessment documents is accurate, they shall not be liable for any damages (including without limitation damages for pure economic loss or loss of business or loss of profits or depletion of goodwill or otherwise in each case, whether direct, indirect or consequential, or any claims for consequential compensation whatsoever (however caused) arising in contract, tort (including negligence or breach of statutory duty), misrepresentation, restitution or otherwise, in connection with the Assessment documentation or any information contained in it, or from any action or decision taken as a result of reading this documentation or any such information).

1.10 Acknowledgements

Stronger Together is grateful to partners and associates that have contributed to the development of this methodology and to the members of the Seasonal Workers Scheme Taskforce – representing growers, labour providers, retailers and industry organisations – who have provided valuable inputs and comments on its development.

2. Consultant Operating Protocols

2.1 Introduction

Only consultants that meet certain criteria and have been through the pre-approval process are approved to deliver the Responsible Recruitment Progress Assessments.

2.2 Consultant approval process

2.2.1 Consultant application to join Stronger Together Expert Consultants Network

Before qualifying to deliver the RRPA, consultants must apply to join the Stronger Together Expert Consultants Network.

Consultants must submit a CV and cover letter demonstrating how they meet the below criteria:

ESSENTIAL:

- At least 5 years' relevant responsible recruitment and labour supply chain auditing/assessment experience
- Extensive knowledge of relevant UK and international labour standards and frameworks including on responsible recruitment and relevant UK recruitment, employment and immigration legislation
- Knowledge of labour provider sourcing and recruitment models and processes
- Demonstrable consultancy skills including interpersonal and communication (both oral and written) creativity and innovation, forensic investigation skills, problem-solving, strategic planning and analytical skills.

DESIRABLE:

- Professional social compliance auditing qualification.
- Multi-language skills
- Knowledge of recruitment and emigration processes and legislation for common labour sourcing countries

Consultants that meet the criteria will then be invited onto a two-stage interview process with Stronger Together and must submit references from previous consultancy/professional work.

2.2.2 Interim approval

If successful at interview, consultants will sign necessary terms of engagements and consultancy agreements with Stronger Together including confirmation that they may not deliver RRPAs for any labour provider and recruitment intermediaries for whom they have delivered consultancy services in the past 24 months.

The consultant will then be required to complete any necessary training courses including:

- Eliminating Worker-Paid Recruitment Fees
- Labour Supply Chain Due Diligence and Partnerships
- Fair and Equal Opportunity and Treatment
- A dedicated 1-day training course on the Responsible Recruitment Progress Assessment methodology

2.2.3 Qualification to deliver the Organisational Performance Assessments

The RRPA training course is a 1-day course, followed by a two-hour competency exam to test understanding of the processes and methodology used in the RRPAs.

Only those members of the Stronger Together Expert Consultants Network that have successfully completed the RRPA training course will be qualified to deliver the RRPA. Consultants in the Network

that choose not to attend the RRPA training course, may deliver other ad hoc training and consultancy services referred by Stronger Together.

2.2.4 Access to the Responsible Recruitment Toolkit

Once qualified to deliver the RRPA, Consultants will be provided with a Supply Chain subscription to the RRT Online Tool to enable them to connect to and review self-assessment and uploaded evidence submitted by RRT subscribers.

2.3 Quality management

2.3.1 Calibration

Stronger Together will quality review all assessment reports before they are issued to Labour Providers. Stronger Together also reserves the right to witness any consultant's delivery of an RRPA to assess if it is being delivered in accordance with these General Regulations.

2.3.2 Issues in quality of service

- Where evaluations identify quality issues isolated to an individual consultant, Stronger Together will contact the consultant to discuss the issues and where relevant identify necessary solutions to improve quality. Where continuous improvement is not observed – Stronger Together may choose to no longer refer RRPAs to the consultant.
- Where evaluations identify quality issues common to the Approved Consultants, Stronger Together may issue guidance or organise webinar training sessions to support consultants to make improvements.
- Where a complaint is made by the Labour Provider and/or Recruitment Intermediary in relation to quality of delivery by the consultant, Stronger Together will investigate and determine outcomes including where necessary suspension or termination as outlined in 2.4.

2.4 Working relationship and consultancy agreements

The relationship between Consultants and Stronger Together will be governed by contracts and will encompass the processes outlined above as well as provision for other ad hoc consultancy and training directly or indirectly referred by Stronger Together.

Consultants may be suspended or terminated from delivering RRPAs or wider consultancy services on behalf of Stronger Together if they:

- Deliver an RRPA, use the RRT to deliver other consultancy, or deliver some other form of consultancy in Stronger Together's name, without a referral from Stronger Together or gaining authorisation from Stronger Together in advance;
- Are guilty of any gross, serious or persistent misconduct and/or negligence in the provision of the Assessments;
- Fail or refuse after written instruction to provide the Assessment reasonably as previously agreed;
- Persistent issues in quality of delivery of RRPAs (see 2.3.2);
- Commit any fraud or dishonesty or act in any manner which in the opinion of Stronger Together brings or is likely to bring the Consultant, Stronger Together, or any customer organisation into disrepute or is materially adverse to the interests of Stronger Together.
- Are in breach of any of the terms of their contractual agreements with Stronger Together which, in the case of any breach capable of remedy, shall not have been remedied within 14 days of receipt of a notice from Stronger Together specifying the breach and requiring its remedy.

3. Labour provider application and scoping

3.1 Labour provider application process

Labour providers wishing to commission an RRPA should first contact info@stronger2gether.org to make an enquiry. Labour Providers looking to commission an RRPA should:

- Have subscribed at the Full level to the RRT (free to labour providers in the supply chains of RRT Sponsors) and completed the RRT self-assessment
- Have individuals with responsibility for responsible recruitment who can input into the review process in a constructive and timely manner with sufficient capacity available to them to engage fully in the process
- Be willing to have an Approved Consultant assess their responsible recruitment management systems and speak to their prospective and current workers
- Agree to the outcomes of the assessment being shared with labour user clients and end-user customers with a view to reducing audit duplication
- Agree to implementing any follow ups and recommendations of continuous improvement made by the consultant in a timely manner

Stronger Together will then share these General Regulations, the contractual terms for the assessment, and the RRPA Application and Assessment Scoping Form.

Labour Providers should submit their completed **Application and Assessment Scoping Form** including:

- **Detailed domestic and international recruitment processes and labour supply chain mapping information** of all recruitment intermediaries used in the sourcing of workers from community of origin to place of employment including any service providers e.g. translation agencies, and all labour user clients and their locations.
- All labour user clients and client site locations
- Nominated contacts for escalation of serious issues – see 6.3.

It is recommended that a company should make its initial enquiry for an RRPA at least 8 weeks before they intend for the assessment to take place. This is to ensure sufficient time for application, pre-assessment planning and document review.

3.2 RRPA intermediary selection and timeline planning

Once Stronger Together has received the signed contract and completed **Application and Assessment Scoping Form**, Stronger Together will independently select the Recruitment Intermediary to be assessed (or for direct recruitment only – In-Country Recruitment team/process) based on risk assessment information including:

- Number of workers sourced
- Length of sourcing relationship with the intermediary
- Human rights risk-profile of the country
- Relevant emigration/immigration regulations that may make workers more vulnerable to exploitation

Once selected, Stronger Together and the Labour Provider should discuss preferred dates for the RRPA to take place based on the Labour Provider and Recruitment Intermediary's planned main recruitment. For seasonal recruitment, where possible this should be timed early into the Season after some recruitment and deployment of workers has taken place but whilst recruitment in-country is still ongoing.

Stronger Together will issue the Labour Provider with a template communication to confirm to the selected Recruitment Intermediary that they have been selected for assessment, to confirm their participation in the process and to commence completion of the RRT self-assessment if not already using the tool. It is recommended that the Labour Provider informs all recruitment intermediaries pre-application that there is a possibility of selection for in-country assessment. Where a Recruitment Intermediary refuses to engage in the process, the reasons for this should be documented and an alternative intermediary will be sampled.

3.3 RRPA consultant and date confirmation

Once the Recruitment Intermediary/In-Country recruitment team have been selected and confirmed, Stronger Together will then liaise with Approved Consultants to identify and confirm consultants for the assessment:

- Stronger Together will issue with a call for expressions of interest to all Approved Consultants typically with a 2 working day deadline
- Consultants express interest by the deadline confirming:
 - Availability to attend the assessment on the proposed dates and in the proposed countries
 - Indicative travel and hospitality expenses for UK and overseas travel
 - If relevant, a short paragraph indicating relevant sector experience and expertise
 - That the consultant has not worked with the Labour Provider or selected Recruitment Intermediary in the last 24 months, which could create a conflict of interest. All work with the companies to be assessed should be declared.
- Stronger Together will then endeavour to allocate the assessment on a fair basis based on the above information. Where possible, to keep travel expenses to a minimum and ensure best relevant experience, Stronger Together will identifying an assessment team comprised of:
 - A UK-based consultant to be Lead Consultant - managing the overall assessment process and delivering the UK part of the assessment, and,
 - A globally based consultant to deliver the in-country assessment and report findings into the UK-based consultant.

Stronger Together will then send an email to:

- Confirm the selected Consultants to the Labour Provider. The Labour Provider will have the right of refusal at this stage, but this is expected to be used only in exceptional circumstances.
- Once confirmed, introduce the Consultant, Labour Provider and selected Intermediary/in-country team and confirm the finalised dates and locations of the assessment (UK Head Office, UK labour user client sites and overseas locations).
- Arrange a date for a kick-off call with the Labour Provider and any selected Recruitment Intermediary to discuss the pre-assessment requirements, which should take place **no later than six weeks** before the date of the assessment.

3.4 Kick-off call

Once commercial and procedural arrangements have been agreed, Stronger Together will arrange a kick-off call between S2G, the Lead Consultant, the Labour Provider and (where relevant) the selected Recruitment Intermediary.

During the kick-off call, the Lead Consultant will:

- Request that the Labour Provider and its selected Recruitment Intermediary ensures its RRT self-assessment is up to date, that evidence of progress is uploaded using the Priorities and Actions functionality, and shared with the Lead Consultant and Global Consultant via the Connections functionality on the RRT online tool

- Request an organisational chart, outlining all the roles that are involved in strategic and operational implementation of responsible recruitment, to be returned to the Lead Consultant within a two-week timeframe
- Share the document review list for the assessment and explain that any operational documentation not uploaded onto the RRT Online Tool that is required for the purposes of the assessment, should be separately submitted (for example using a Dropbox shared folder) – including company records, responsible recruitment management systems (policies, procedures, training, communication, monitoring), operational documentation (recruitment processes, job boards, application forms), and labour supply chain due diligence.
- Answer any questions from the Labour Provider on the above.

Following the kick-off call, Stronger Together will send an email to confirm instructions and deadlines for the above. Following this, the 6-week pre-assessment phase will commence and the Lead Consultant will take over direct liaison with the Labour Provider and Recruitment Intermediary.

4. Pre-assessment process for Labour Providers, Recruitment Intermediaries and Consultants

4.1 Submission of pre-assessment information (6 to 4 weeks pre-assessment)

Between six and four weeks prior to the assessment the Labour Provider and its selected intermediary will be required to complete and submit the following information to the Consultant by a deadline four weeks in advance of the assessment:

- **Responsible Recruitment Toolkit (RRT):** Companies should review their RRT self-assessment, ensure it is up to date and reflect an honest self-assessment of progress in implementing the good practice steps, that comments and/or evidence are uploaded for each of the steps (in .DOC or .PDF) format. For any documents that require to be shared in .XLS format – the consultant and Labour Provider should agree how these documents will be shared safely and securely. Once ready, the Labour Provider and intermediary should connect to the Lead Consultant (and where relevant the intermediary should connect to the Global Consultant) via the **Connections** functionality in the RRT online tool and download a .CSV file of the **Priorities and Actions** page and submit it to the Lead Consultant (and Global Consultant).
- **Organisational chart**
- Any **other operational documentation** not uploaded as evidence into the RRT online tool but required for the purposes of assessing the Labour Provider's systems – as outlined in the Document Checklist.

4.2 Review of pre-assessment information (4 to 2 weeks pre-assessment)

Between four and two weeks prior to the assessment, the Lead Consultant will:

- Contact the Labour Provider and (where relevant) selected Recruitment Intermediary to arrange a 30-minute planning call, two weeks prior to the assessment, and to highlight and request that any missing documentation is shared and/or any documentation of poor quality is reshared in an appropriate quality format, and/or any additional documents required to provide clarity are submitted.
- Review the organisational chart
- Review the company's RRT report and uploaded evidence
- Plan management and team interviews at Labour Provider Head Office and with the selected Recruitment Intermediary.
- Plan worker interview on UK labour user client sites and in-country as part of recruitment processing. The selection of Labour User client sites may not be influenced by the Labour Provider. The selection will take into account the demographics of workers to ensure a representative sample – see 5.3.5
- Use the information to produce a draft assessment itinerary with proposed scheduled meeting times in the UK and overseas.
- Share this itinerary with the Labour Provider and (where relevant) selected Recruitment Intermediary in advance of the planning call.

4.3 Planning call (2 weeks pre-assessment)

During the planning call, the Consultant, Labour Provider and (where relevant) selected Recruitment Intermediary will:

- Discuss the draft assessment itinerary and confirm the most relevant management and team members have been selected for interview at Labour Provider Head Office and Recruitment Intermediary Head Office.
- Confirm the Labour Provider has secured all labour user clients' acceptance to receive the consultant for worker interviews on-site.
- Confirm the selected labour user client sites for worker interviews.

- Answer any final queries on the assessment process and reconfirm the list of required documents for the assessment.

Following the planning call, the Consultant will issue the finalised assessment itinerary and resend the list of required documents.

Adhering to the above pre-assessment schedule should provide the Consultant, Labour Provider and Recruitment Intermediary with sufficient planning time to ensure the time of the on-site assessment can be used most effectively. The Lead Consultant (with input from the Global Consultant) should also undertake research to ensure that there is no other external information that may impact the review. Consultants are required to be up to date with the latest legislation, RRT steps, other standards, industry norms and any other relevant information relating to responsible recruitment and the organisation undertaking the assessment.

5. The Assessment Process

5.1 Introduction

Depending on the pre-audit planning the RRPA will take place at the Labour Provider's Head office and where any international recruitment takes place should also take place either:

- At the Head Office of a selected Recruitment Intermediary in-country
- At the offices of a selected in-country team where recruitment is done directly by country-based teams
- Or during the recruitment activities of a selected country where recruitment is done directly by UK-based teams that travel.

5.2 Assessment duration

The RRPA is a **7-day** assessment encompassing:

- 1-day preparatory work, kick-off call and planning calls
- 5 days including:
 - On-site assessments (UK and overseas)
 - Worker interviews and closing meeting
- 1 day report writing (0.5 day per report)

Out of scope:

- Travel expenses
- Any independent translation and interpreting services required for worker interviews

5.3 UK Labour Provider assessment

DAY ONE

5.3.1 Arrival at Labour Provider Head Office

The RRPA will typically commence at the start of a standard working day e.g. 9:00am. The Lead Consultant should report to their contact upon arrival.

5.3.2 Opening meeting

The consultant will conduct an Opening Meeting at the Labour Provider's Head Office or where polices are centrally held with the appropriate business personnel, in a language understood by all attendees, covering such matters as:

- Confirmation of the consultative nature of the RRPA, explaining the emphasis on the management systems review, the difference and benefits to that of an ordinary social compliance audit.
- Discuss the RRT self-assessment and that the Consultant will be verifying their responses and will, where relevant, inform identified management system gaps and options that the business may choose to undertake to implement a comprehensive responsible recruitment management system.
- Explain the implementation statuses and % progress scores (by RRT Step, Standard and overall)
- Confirm the stages of the review and the information that is required at each stage.
- Confirm that the onus is on the Labour Provider to demonstrate their progress against each of the RRT Steps, not for the Consultant to prove non-compliance.

- Confirm the availability of office space at Head Office for management interviews and private space for worker interviews at Labour User Client sites.

5.3.3 Management system (policy, process and procedural) review

The system review should include a number of different approaches to evaluate the effectiveness of the responsible recruitment management systems both internally and within the labour supply chain. The approaches used should give the Labour Provider's management the opportunity to evidence their progress towards implementing the RRT self-assessment steps.

a. Management interviews

- Senior Management interviews regarding the company's commitment to responsible recruitment
- Identify and conduct interviews with relevant personnel identified via the assessment planning, organisational chart and/or through initial documentation review and management interviews. This may include but not be limited to:
 - All ethical trade/compliance/CSR relevant team members/individuals
 - Recruiters
 - Procurement teams responsible for recruitment intermediary selection and negotiation
 - Sales/Commercial teams responsible for relationship management and costing for labour user clients
 - Technical/Legal/Other corporation functions
 - Legal
 - Overseas-based company staff responsible for recruitment in-country
- Interviews with relevant individuals involved in management of responsible should have their competencies, training, strategic and/or operational responsibilities discussed and how the policies, reviewed procedures and controls are implemented within their day-to-day roles.

b. Systems and Document Review

- The consultant should review management systems documentation and records in sufficient detail to confirm that management systems are in place, being maintained and are effectively implementing responsible recruitment good practice (e.g. policies, risk assessments, meeting minutes, internal and external communications, training undertaken, KPIs etc.)
- Most of the document review will have taken place pre-assessment. During the assessment, the Consultant can seek clarification on documentation submitted and request and review any missing documentation. Remaining review can take place on the afternoon of day one of the assessment (at Head Office), however there will likely also be documentation to review on-site and specific documentation evidence required after the worker interviews (see below) to verify any information raised.

DAY TWO AND THREE

The Consultant should visit two Labour User Clients' sites on days two and three (at least one site per client). The focus of the labour user client site visits is to undertake worker interviews. It is not to perform an audit of the Labour User clients' own labour standards and health and safety management systems. Where any issues are observed on site (e.g. obvious health and safety failings) or issues to do with the Labour User's own staff are raised by workers (e.g. harassment of workers by supervisors), these should be recorded in the critical issues report and dealt with through the escalation process at 6.3.

5.3.4 Arrival at Labour User Client Site(s)

On arrival at each site, the Consultant will introduce themselves to Labour User management, request a list of workers on-site that day, and explain the purpose of the visit to site is to interview workers recruited by the labour provider, to understand their recruitment and deployment experience, to test that the labour provider's responsible recruitment management systems are functioning in practice, and to confirm that the labour provider's due diligence on clients is effective.

5.3.5 Worker Voice and Grievance Mechanism Testing: Sampling

Worker interviews should take place on site, in a private space out of view of the Labour User and/or Labour Provider (if accompanying on day two).

As standard practice in social compliance audits, worker interviews should take place in paid time and the Consultant will select workers for interview without interference from the Labour User and/or Labour Provider.

Consultants should endeavour to ensure that the worker interviews capture an accurate reflection of worker demographics such as gender, country of origin and roles/nature of work undertaken. The sample must include some workers recruited by the selected Recruitment Intermediary/In-Country team, and should also include workers recruited by other Recruitment Intermediaries/from other countries for comparison of experience.

Worker interviews across the two days on site should comprise of at least:

- 20 individual worker interviews
- 4 group interviews with 4 workers each
- Any other interviews necessary to ensure a representative sample across the two days of labour user client site visits.

Where possible, interviews should be 30 minutes in length to enable sufficient time for trust to be built. They may be shortened to 25 or at a minimum 20 minutes where necessary to enable a greater sample of workers to be selected to ensure a representative mix.

Worker interviews should focus on understanding:

- The full recruitment process experienced by workers and whether this matches the management systems presented by the Labour Provider – including what information they have received at each stage of recruitment and deployment and whether any fees or costs have been incurred.
- Workers' knowledge of, understanding and trust of grievance mechanisms, response and remedy procedures available to them.
- Any potential risks faced by workers during their recruitment and deployment.

Independent interpreting services must be used for worker interviews where the workers' first language is not English and where English language competency is not a requirement of the role.

Consultants should use open, descriptive questions and avoid prescriptive/direct questions in accordance with the Worker Interview Guide.

5.3.6 Pre-closing review

Ahead of the Closing Meeting (see 5.5.), it is recommended that consultants allocate some time to review further documentation and their own notes on the findings from the two-day assessment to prepare for the discussions in the Closing Meeting.

5.4 In-country assessment

The methodology for the in-country assessment should follow a similar methodology to the UK labour provider assessment accepting that:

- Where an assessment team has been compiled, the in-country assessment will be delivered by the Global Consultant
- Instead of Labour User Client site worker interviews, a selection of jobseekers being processed for recruitment by the Recruitment Intermediary for deployment via the UK labour provider should be selected for interview.
- Interviews should be scheduled into time when selected workers will be at the Recruitment Intermediary's office or other location (e.g. a training centre for pre-departure orientation training) for recruitment processing anyway, so they do not need to make a separate journey for worker interview.
- Where the first language of the assessor is not that of the documentation being reviewed – e.g. worker contracts – online translation tools will be used in the first instance, engaging professional translators where necessary. (Please note the same provisions for independent interpreting for worker interviews will apply as in 5.3.5).

5.5 Assessment Closing Meeting Final Verification, Recommended Improvements and Next Steps

The Closing Meeting with the UK Labour Provider should take place once the in-country assessment has taken place. Therefore it is likely this will take place online by prior arrangement.

The Consultant should explain the indicative findings and how they reached their conclusion. The RRPA approach should focus on what the organisation is doing and what they need to do to strengthen their programme. There should be a consultative approach during this meeting and all relevant personnel should attend. The Consultant should be constructive alongside evaluative.

Observe: The Consultant will explain to the Labour Provider what they have observed in a fact-based way and how they have come to their conclusions based on the system review and any further evidence gathered during labour user visits and worker interviews. The consultant will encourage management to engage and respond to findings as appropriate.

Impact: The Consultant will talk in systematic terms. Feedback based around system findings is more likely to elicit a constructive response from an individual.

Action: The Consultant will provide the Labour Provider with the opportunity to shape their improvement recommendations and next steps drawing on the experience of the Consultant to inform possible options.

The focus should be on the Labour Provider participating in the RRPA and so this stage should have appropriate time allocated for the Labour Provider to ask questions and clarify what is needed to improve their programme. All agreed improvement recommendations should be documented.

The Consultant should then conclude the meeting covering such matters as:

- Thanking the management for their time
- Advising the company of indicative findings and seeking clarification on any points as required. The consultants will not issue any reports at this meeting
- Explaining the process for receiving the report and reminding the company of the approach to scoring.

6. Reporting and Assessment Outcomes

6.1 Production and issue of RRPA Report

For any critical issues identified during the course of the assessment, the Consultant will note these in the **Forced Labour and Critical Issues Record** and issue this immediately to the nominated contact – see 6.3 for further information.

For other assessment reports, the following process will be followed:

- Within five working days of the Closing Meeting, the Consultant will email the draft reports to Stronger Together.
- Stronger Together will undertake a quality review within three working days to confirm the findings have been reported in accordance with the report writing guidance.
- Once quality reviewed, the reports will be issued to the Labour Provider and Recruitment Intermediary to respond and clarify any points within three working days. The businesses will not have an opportunity to submit any further evidence at this stage but may query where they believe information is inaccurate. Where the Consultant(s) agrees with any query, they may make any final changes. Where the Consultant(s) does not agree, it will note the comments from the Labour Provider and/or Recruitment Intermediary in the report.
- The Lead Consultant will then issue the final Assessment Reports within three working days:
 - **The Full Assessment Report** for each party assessed – this provides an executive summary with a high-level overview of common findings and recommendations, a % progress score for the company's overall responsible recruitment progress, for each standard, as well as a series of findings and recommendations for each of the 14 Standards in the Responsible Recruitment Toolkit.
 - **The Customer Report** – same as the Full Assessment Report with commercially sensitive information and progress scores redacted.

The Labour Provider owns these reports but agrees as part of the application process to share the Customer Report with all labour user customers, and where relevant customers of customers e.g. UK retailers to support transparency and reduce audit duplication.

The Consultant and Stronger Together will treat all commercially sensitive information contained within the Full Assessment report as confidential.

6.2 Assessment Control Points, Implementation Statuses and % Progress Scores

The Assessment is aligned to the Steps within the 14 core Standards of the Responsible Recruitment Toolkit and the overarching 6-step UNGP framework as they relate to Labour Recruiters/Providers and their Recruitment Intermediaries. Any Steps that relate only to employers (direct e.g. farms or labour providers providing employment services) are not in scope:

- 1 NO FORCED LABOUR
- 2 NO CHILD LABOUR
- 3 NO RECRUITMENT FEES ARE PAID BY WORKERS
- 4 JOB INFORMATION IS ACCURATE AND TRANSPARENT AND EMPLOYMENT STATUS IS APPROPRIATE
- 5 ALL WORKERS ARE PROPERLY RECRUITED AND ONBOARDED AND LEGAL ELIGIBILITY TO WORK IS ESTABLISHED
- 6 WAGES AND BENEFITS ARE PAID FAIRLY AND PROPERLY
- 7 REGULAR WORK IS OFFERED AND WORKING TIME IS NOT EXCESSIVE
- 8 WORK CONDITIONS ARE SAFE AND HYGIENIC
- 9 ACCOMMODATION AND TRANSPORT ARE SAFE AND HYGIENIC
- 10 FREEDOM OF ASSOCIATION IS RESPECTED

- 11 OPPORTUNITY AND TREATMENT ARE FAIR, EQUAL AND DIGNIFIED**
- 12 TERMINATION RIGHTS ARE PROVIDED**
- 13 ACCESS TO REMEDY IS ENSURED AND A WORKER-CENTRED CULTURE IS PROMOTED**
- 14 BUSINESS CONDUCT IS ETHICAL AND PROFESSIONAL**

For each of the relevant RRT Steps, the assessed businesses will self-assess their progress as Completed (1), In Progress (0.5) or Not Started (0).

The average of the scores across each Step is used to generate the % progress scores provided for each Standard and for the self-assessment overall.

During the assessment, where the Consultant believes the self-assessed score is different from the actual implementation evidenced by the business, the Consultant will make a note in the report and change the status for the purpose of the Full Assessment Report e.g. from Completed to In Progress, or from In Progress to Not Started.

6.3 Escalation and response

During the course of a RRPA, the consultant may uncover actual evidence of or indicators of forced labour, labour exploitation and other enforceable criminal and illegal practices (collectively critical issues) which may include:

- Forced labour and modern slavery
- Child labour
- Workers in debt bondage as a result of recruitment fees and related costs
- Systemic physical and/or mental mistreatment of workers
- Systemic use of workers without the legal right to work
- Phoenixing
- Directors engaged in suspicious/criminal activity
- VAT fraud and money laundering
- Gross underpayment of National Minimum Wage
- Employment tax fraud and evasion
- Coercive benefit fraud
- Severe risk to the health and safety of workers
- Systemic evasion of employment laws leading to gross denial of employment rights

As part of the application process, the Labour Provider will confirm who the nominated Response and Remedy Contacts for where serious issues are identified:

- On farm with no indicators of complicity of senior management
- On farm with indicators of farm senior management complicity
- Within the Labour Provider recruitment team with no indicators of complicity of Labour Provider senior management
- Within the Labour Provider recruitment team with indicators of Labour Provider senior management complicity
- Within an agent associated to act as local recruitment provider
- Within an unapproved third party

For any critical issues identified during the assessment, the Consultant will immediately notify the nominated Response and Remedy Contact(s) via the Forced Labour and Critical Issues Record in accordance with guidance in that document.

Where immediate risk to workers is reported and/or indicators of modern slavery/forced labour the nominated Response and Remedy Contact will:

- Contact the relevant enforcement authorities (call '999' where workers are in immediate danger)
- Take steps to ensure that the individual(s) is protected from harm or abuse and remains safe throughout the whole process.
- Capture and protect evidence.

For issues that do not present immediate risk to workers, and where further information is required, the nominated Response and Remedy Contact(s) should initiate an investigation without unreasonable delay to gather the necessary information and identify the required remediation. This might include:

- Ongoing communication with any whistleblowers (protecting confidentiality and anonymity where this is requested)
- Speaking to the implicated business – where confident affected workers will not be identified/put at risk
- Commissioning an unannounced follow-up assessment/investigation visit
- Contacting relevant enforcement authorities where enforceable breaches are identified

The nominated Response and Remedy Contact will immediately engage in a plan to remedy the issues identified involving other relevant parties in the supply chain e.g. supermarket customers. Businesses should use their leverage to ensure that issues are resolved and remediation provided to workers within an appropriate time period in accordance with good practice guidance such as in the Responsible Recruitment Toolkit Access to Remedy Standard and Recruitment Fees Policy template, Impactt Principles and Guidelines on Repayment of Recruitment Fees and CGF Guidance on the Repayment of Worker-paid Recruitment Fees and Other Related Costs.

7. Follow-up and continuous improvement

7.1 Improvement period

The RRPA is intended as a beyond audit, continuous improvement process, with a recommended annual independent assessment cycle.

Following issue of reports, the Labour Provider and selected Recruitment Intermediary are expected to commence working on any identified gaps and recommended improvement actions.

Progress may be reviewed in one of the following ways:

- If critical gaps/actual risks identified – submission of actions taken within 1 week via RRT online tool and follow-up in-person verification assessment within 1 month

OR

- If management systems gaps creating potential risk – submission of actions taken within 1 month via RRT online tool and follow-up self-assessment within 3 months

7.2 Ongoing communication and progress reporting

Labour providers are expected to update their RRT self-assessment on a quarterly basis, including progress scores, comments and document uploads to demonstrate progress to clients. Businesses with an RRT Supply Chain account (which includes all RRT Sponsors) may request to link to the Labour Providers to view their progress digitally within the RRT Online Tool. Otherwise, Labour Providers can download PDF and/or CSV versions of relevant reports from the RRT to demonstrate progress to clients.

It is also expected that Labour Providers will maintain regular communication with clients and their end-customers throughout the assessment cycle, including through emails and progress meetings, to demonstrate continuous improvement and help to minimise the need for any separate client-specific due diligence.

7.3 Full re-assessment

Labour providers are recommended to go through a full reassessment on an annual basis until such a point that they may choose to transition to industry certification (e.g. Clearview) which typically have a three-year certification cycle.

7.4 Free complementary training and resources available through RRT Sponsorship

All eligible suppliers in the RRT Sponsorship programme can access RRT's suite of interactive online training courses and practical guidance and resources at no cost to support implementation and continuous improvement. We would recommend Labour Providers and Recruitment Intermediaries attend relevant upcoming courses to further build capacity.

End