

# PROMOTING RESPONSIBLE RECOVERY

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Detecting, Mitigating, &  
Remediating Modern Slavery  
in Supply Chains



## **Briefing note: Webinar Two**

# Using Employee Feedback to Assess Working Conditions: Identifying Risks through Worker Engagement

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## **Introduction to the series**

This briefing forms part of a broader five session series of webinars standing to tackle contemporary issues impacting modern slavery in supply chains, calling for candid discussion and pragmatic solutions. The objectives being:

- Discuss pragmatic actions in modern slavery risk assessment, mitigation, and remediation
- Identify gaps in guidance, services, or products to address modern slavery in supply chains
- Produce briefing documents following each webinar with actionable recommendations for supply chain stakeholders

A full overview of the series is provided at:

**[www.gfems.org/event-webinar-series-responsible-recovery](http://www.gfems.org/event-webinar-series-responsible-recovery)**

# About webinar session two<sup>1</sup>:

Workers themselves know better than anyone the conditions under which they are employed. The problem is that many companies aren't asking or aren't listening — at least not in an effective manner. At the same time, COVID-19 has presented new considerations as workers are socially isolated, and lack the regular channels for providing feedback. However, does this also present new opportunities for disclosure of risk?

Numerous solutions to strengthen worker voice already exist while technological advances continue to offer refinements. Technology is also just one component in an operational strategy of dialogue and engagement. This session discussed promising products and concepts in identifying and addressing modern slavery through worker feedback. Obtaining worker feedback should not be viewed as a luxury but instead at the core of good business.

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1. The webinar was held Tuesday, June 30, 2020, 9:00-10:30am EDT.

**Moderator:**

• Kilian Moote (Director- Forced Labor and Trafficking, Humanity United)

**Panelists:**

• Antoine Heuty (Founder/CEO, Ulula)

• Hannah Thinyane (Principal Research Fellow, United Nations University)

• Jarett Basedow (Regional Director- Asia, Issara Institute)

• Leanne Melnyk (Vice President- Sustainability and Compliance, L&F Group)

• Suraiya Haque (Executive Director, Phulki)

## Understanding the core issues at stake: A discussion

COVID-19, with all the associated challenges to global response and recovery, has shone a light on the importance of essential workers, many of whom are working across different industry supply chains — be that the production of essential Personal Protective Equipment (PPE), ensuring the functionality of food processing chains, or the production of other essential medical, sanitary, and food items. Understanding their experiences is crucial to the sustainability and resilience of these supply chains as well as ensuring decent and fair conditions for workers.

The first webinar<sup>2</sup> in this series highlighted the need for increased monitoring for modern slavery risk in potential hotspot geographies/industries, including those directly involved in the pandemic response and recovery. At the same time, discussants underpinned the need to establish and maintain mechanisms to collect worker feedback and report grievances. It is these issues that we now dig in to.

### **Webinar One Key Recommendations to include Worker Voice:**

Approximately, 25 million people are in forced labor and yet their voices are not being heard. Worker voice engagement platforms and initiatives seek to remedy that gap and are increasingly recognised for their positive impact on workers and businesses alike. Rende-Taylor and Shih (2019), in their paper, Worker feedback technologies and combatting modern slavery in global supply chains: examining the effectiveness of remediation-oriented and due-diligence-oriented technologies in identifying and addressing, note how:

*“Innovation and technology can be harnessed by stakeholders across the supply chain to facilitate the timely and remote identification of risks to modern slavery. As COVID-19 social distancing measures continues, technological advancements in remote risk identification<sup>3</sup> and remote due diligence monitoring can be leveraged [...] and Employers should make available confidential, safe and remote feedback mechanisms so that grievances can be raised, and the voice of the worker is heard. This may require businesses to take a leadership role to ensure the availability of feedback mechanisms across their supply chain”.*



*“Worker voice’ has emerged as a recent, often technology-enabled, approach to responsible sourcing, with the potential to achieve two critical ends: first, the collection of more and better data for supply-chain due diligence and detection of labour risks; and, second, the empowerment of workers, to better hear their feedback and strengthen remediation accordingly”.*

Worker voice tools not only provide employees with a safe, secure, and confidential feedback mechanism, but stand to promote mutual trust between workers and employers, often leading to increased worker engagement and retention. Approaches which place the voice of the worker as central also stand to empower employees to seek improvements in their workplace.

Importantly, for businesses, they provide an often efficient, effective, practical, and scalable means to quickly identify and minimize organizational risks as well as ensure due diligence and remediation through issue identification. Worker voice tools support social audits and compliance efforts through the provision of first-hand information by workers in diverse and remote locations<sup>4</sup>.

In recent years, there has been a flourishing of tools, anchored in technological developments, to support such goals. Farbenblum et al. 2018<sup>5</sup> offer a four-purpose typology for ‘worker empowerment tools’:

1. To enable workers to rate and review recruiters, employers, and other intermediaries;
2. To facilitate migrant workers’ access to justice;
3. To provide migrant workers with responsive and tailored information;
4. To promote peer-to-peer connections and collective organizing among workers.

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2. <https://www.gfems.org/news/2020/8/4/briefing-responding-to-covid-19-what-can-companies-do-to-promote-responsible-recovery>

3. This topic is discussed in more detail during webinar three. For more information, please consult [here](#).

4. Such issues are also discussed in articles by [Supply Shift](#), [LaborLink](#), and in an interview with [Ulula](#)

5. Farbenblum, Bassina, Berg, Laurie & Kintominas, Angela (2018), ‘Transformative Technology for Migrant Workers: Opportunities, Challenges, and Risks’, Open Society Foundations, New York. <https://www.opensocietyfoundations.org/sites/default/files/transformative-technology-for-migrant-workers-20181107.pdf>



## Key challenges to Using Employee Feedback to Assess Working Conditions

A recent study by [LaborLink](#) found that a growing number of businesses believe that worker voices are underrepresented and underutilized in supply chain monitoring and management.

Despite the importance of workers' voices, there are a number of constraints and challenges deeply impacting the possibility of workers to speak out, as discussants tackled.

### Workers....

- Often do not trust that the systems and processes allow them to speak out honestly, openly, and confidentially, and hence may feel reluctance to admit instances of modern slavery. This is further impacted in cases where feedback platforms are not perceived to be independent or confidential by workers.
- Those who are particularly marginalized may be overlooked, neglected, or deliberately kept out of feedback platforms, biasing findings on modern slavery as such groups of workers are most often at risk. This may be

a particular risk where there is sub-contracting in the supply chain or due to the extended nature of supply chains, where there is less auditing and or an absence of worker feedback mechanisms downstream or in remote locations.

### Businesses....

- May be reluctant to expose modern slavery and thus are not proactive in seeking worker feedback due to reputational concerns.
- May be inexperienced with identifying and remediating modern slavery through worker engagement.
- May be unsure of the frequency with which to collect worker feedback as well as what to do with the data once they have obtained it.
- May lack resources (human and financial), or fail to prioritize resources, impacting the scale and scope of worker feedback.
- Despite best intentions, the unpredictability of audits and the coaching of employees by employers on what to say can have a negative impact on the validity of findings and present a distorted and more favorable reality of the actual working conditions.

### Tool design & situational context...

- A clear and functional design of worker feedback mechanisms is critical. In many instances, workers are not consulted in their design and implementation. In other examples, tools have not been designed to uncover

modern slavery or may even have been designed to overlook it.

- Traditional supply chain auditing, for example, often overlooks many deep-seated issues around abuse and exploitation.
- Inadequate or limited training on the use of worker feedback tools may lead to gaps and/or errors in usage and information collected.
- Regarding COVID-19 specifically, lockdown measures have impacted the opportunity for the detection and disclosure of modern slavery, as well as access to factories and other production sites<sup>6</sup>.
- Response time limitations may impact worker disclosure, particularly on sensitive issues related to modern slavery where trust, confidence, and rapport is essential.
- Communication, language, and cultural barriers impact employee trust and disclosure.
- In as much as technology is a facilitator, its use raises new considerations around data privacy and security and the ethical handling of worker feedback, including the issue of retaliation.
- Businesses may not have the resources, ability, or intention to ensure due diligence follow up and remediation, undermining the credibility of worker feedback.

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6. See also <https://www.gfems.org/news/2020/8/4/briefing-responding-to-covid-19-what-can-companies-do-to-promote-responsible-recovery>

## Promising Practices and Products: Business Examples

### **Technology as a catalyst for feedback: The Audit App**

There are a growing number of technology supported applications to facilitate the safe, secure, and confidential collection of information from workers. By increasing the privacy afforded to workers in their interviews with auditors, digital technology can play a role to support businesses to obtain an accurate understanding of the work practices within their own supply chains. Applications vary in what they can provide and businesses should explore which tool best meets their needs as well as best fits their pool of workers.

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As one example<sup>7</sup>, the [United Nations University](#) and the Mekong Club are pioneering a grounded, multi-stakeholder [body of research](#) and [practice](#) to ensure that the voices of workers are both central and confidential during social audits to assess, address, and remediate risk and modern slavery across supply chains<sup>8</sup>.

Launched in 2017, the [Apprise](#) social audit platform helps enhance worker voice, self-empowerment, and safe and decent working conditions through technology; it provides

workers with tools anchored in privacy and a confidential space to adapt to their new environment, develop new skills, and access relevant information.

When used in on-site factory audits, tools such as Apprise can support auditors to proactively and consistently gather feedback from workers, across different languages/dialects. This tool has proved to be particularly valuable when asking sensitive questions that workers (particularly women and migrant workers) would fear disclosing in face-to-face



interviews. Further, the approach has not been impacted by social-distancing requirements due to COVID-19 as workers and employers have been able to continue to use the App remotely and/or away from the workplace.

#### **In an audit of Apprise, it was found that....**

- 92% of sampled auditors believed that technology could be useful to assess worker conditions.
- 94% of sampled workers preferred to be interviewed over the App than in person.

And a [study](#) by the Fair Wear Foundation and Care International found that when clear complaint procedures were in place, female factory workers reported significantly lower levels of abuse, 25% compared with 59%<sup>9</sup>.

This information can be used to direct auditors' further on-site investigations. It is important to note, however, that identifying cases of exploitation is just the first step in a process that must also prevent further workplace exploitation from occurring, and remediate cases that have been identified.

#### **Scaling up to empower worker voices: Feedback at scale**

While businesses need to select the right worker feedback tool to meet their needs, as well as those of their employees, there are a number of models available which have also shown demonstrated results working at scale, and potential for further usage. One example is [Issara](#), a Yelp-like app allowing Burmese workers to rate and review their employers, recruiters, and service providers. Launched in 2017, the Burmese-language smartphone app Golden Dreams is supplemented by a 24-hour hotline, Facebook and Facebook Messenger, and chat apps such as Line and Viber to provide all around, diverse support to workers.

Issara's worker voice channels operate at a unique scale and effectiveness, allowing workers to identify their needs

with a focused responsibility on ensuring operational change by management. The platform demonstrated how technology opened up the space for new grievances to be raised, providing a clear and secure means for workers to identify issues at their worksite. Further, the tool helped expose issues, often not previously known, to decision and change makers, bolstered by a commitment to remediate by employers.

In 2019 the app....

- Received over 85,000 calls and messages, with positive participation from females in particular.
- Covered nearly 200,000 workers through Inclusive Labour Monitoring (ILM).
- Handled daily complaints on serious human rights violations, including modern slavery, not disclosed during traditional social audits.

Issara's efforts have yielded a number of positive results including but not limited to, workers more likely to go to registered recruiters rather than informal brokers, workers demonstrating increased knowledge of rights and laws, and workers organizing to file cases against exploitative recruiters and file grievances directly with employers. Additionally, improved knowledge among recruiters and employers provides a more receptive environment for worker voice, allowing Issara to support the remediation of nearly 20,000 cases of forced labor in the last five years<sup>10</sup>.

#### **Learning to cultivate a culture of trust to find a voice together**

Trust in feedback mechanisms, as well as concerns around the security of sharing confidential information, can serve as barriers to information disclosure on abusive practices and hence the identification of modern slavery. Another challenge is when the feedback shared by workers doesn't result in tangible change.

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Several organizations are working to address these concerns. The [Ulula platform](#), for example, is a multi-language supply chain management, stakeholder engagement and M&E software that allows for seamless global auditing and engagement, serving workers, communities, suppliers, companies, and governments. Importantly, it is developed hand-in-hand with its diverse end-users, taking into account their feedback at each step to not only ensure functionality and applicability, but trust and buy-in. The result is that the Ulula platform uses a variety of different forms of technology to enhance transparency.

*“[The integrated nature of the design and development of the tools demonstrate] the importance of building trust amongst different constituencies and ensuring resolution”.* (Webinar discussant)

Yet ensuring worker voice is not the ultimate goal; it is instead to prevent modern slavery and, where identified, ensure remedy. In Bangladesh, the [NGO Phulki](#), similarly confronted with the challenge of building trust amongst businesses and workers, adopted a mixed-method approach, combining technology with more traditional social audit feedback mechanisms. This approach, embedded in trust, yielded interesting and vital results on broader social issues impacting marginalized populations, often disproportionality at risk of modern slavery. Women, for example, were more likely to speak up on sensitive gender-based issues, such as access to childcare and reproductive health, as compared to

their reporting in traditional audits. Taking this information, Phulki has been able to establish a number of [childcare facilities](#) to support workers.

### Anchoring feedback in mutual responsibility: Codes of conduct

One way to ensure trust in and compliance to worker feedback initiatives is to embed the responsibilities within company codes of conduct, ensuring that roles and responsibilities are clear to both employers and employees. Provided codes of conduct are monitored, enforced, and integrated within employee training on an annual basis, such codes can establish and reinforce the ethical framework under which a company chooses to operate.

Faced with a multi-national, multi-company supply chain comprised of thousands of suppliers, [Li & Fung](#), as one example, embrace and directly invest in technology and partnerships as a means to listen to worker voices at scale: All new employees learn about the Code during orientation, supported by additional training during the course of their employment. Their WorkerApp, for example, offers a wide range of educational materials and an effective way to train and engage workers; and Li & Fung have piloted with the Mekong Club and United Nations University to pilot the [Apprise](#) Audit App in Asia. The Code also requires all employees to work with suppliers to ensure human and labor rights are upheld throughout the supply chain, including the [elimination of modern slavery](#). In addition, Li & Fung audits beyond tier 1 when requested to do so by their customers or where there is a high risk of issues such as child or forced labor. This includes unannounced checks and interviews with management and workers.

While there are challenges to ensuring the same impact of technology along the whole supply chain, their approach has amplified the number of voices that can be reached in a manageable way while further creating a space for otherwise unexplored, undisclosed, and sensitive issues, including modern slavery, to be discussed.

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7. See also [the Elevate App](#).

8. Rende-Taylor and Shih (2019) further recognise the emerging importance of social audits in an attempt to solicit more feedback directly from workers, many of whom report some degree of coaching and know what is expected of them by their bosses during a more traditional audit visit.

9. See also [the blog by Labor Solutions](#).

10. Text adapted from <https://www.issarainstitute.org/>

# Recommendations for businesses to amplify worker voice to detect and prevent modern slavery

Investigating modern slavery can be a daunting task for businesses while disclosing abuse and exploitation can be a terrifying reality for workers, many of whom have previously struggled to have their voices heard. As one discussant noted, how can businesses deal with the extent of information in a responsible way? During the webinar, participants discussed in an open and candid manner how best to create an ecosystem of trust, anchored in an effective governance structure, to ensure the identification of risks through active worker feedback.

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The mechanisms implemented should not constrain but instead facilitate business while protecting the rights of employees to work free from slavery. Obtaining worker feedback is ultimately business-effective, efficient, and impactful. That said, where businesses design and roll-out tools that aim to uncover serious issues, they need to be prepared for what to do with the information they collect.

## 1. Proactive and continuous investments in worker voice mitigate modern slavery risk yet they also uncover cases that require remedy. Businesses should have strategies in place for both risk mitigation and remediation.

- Obtaining worker feedback should be viewed as a continuous safeguarding investment by businesses, with specific, long-term budgeted financial resources for the implementation of worker feedback mechanisms.
- The most effective tools are complemented with specific, ongoing training for employers and employees so that all stakeholders understand

the scope and purpose as well as their own roles and responsibilities.

- The active engagement of workers in the design, development, implementation, and evaluation of feedback mechanisms leads to more effective, trusted, and transparent tools.

- In addition to risk mitigation, worker voice platforms can uncover cases in need of remedy. Businesses should have plans in place for how they will verify and remediate cases of labor abuse that are identified via worker voice platforms.

- Monitoring and documenting remedial actions will allow supply chain actors to track trends over time.

## 2. Feedback mechanisms need to be secure, confidential, and accessible

- Different tools may be needed for different workers or sectors. Tools should be adapted to the local context, including in times of change or crisis.



### Key recommendations for supply chain actors:

1. Proactive and continuous investments in worker voice mitigate modern slavery risk yet they also uncover cases that require remedy. Businesses should have strategies in place for both risk mitigation and remediation
  2. Feedback mechanisms need to be secure, confidential, and accessible
  3. Worker voice data is optimized when plans exist for how that data will drive decision-making
  4. Research and knowledge sharing can build consensus on the utility of worker voice platforms, avoid duplication of efforts, and foster industry wide standards
- Businesses should consider accessibility and which tools are most feasible for the workers they wish to engage. For instance, does the platform require a smartphone and is that accessible for workers in your area of interest? Who has access to and/or control of the phone during working hours?
  - Worker voice platforms should take into consideration linguistic and other variations that might make engaging with the survey difficult. Pilot testing the feedback surveys can help identify any potential issues at the outset.
  - Worker feedback mechanisms should be governed by clear security and privacy guidelines. Special ethical consideration and consult should be given when attempting to engage highly vulnerable workers who may be at risk of retaliation.
  - Establish data use agreements that lay out protocols for ownership and rights to data collected. Given the potential for retaliatory action against workers, companies planning to roll-out a worker

voice platform should have clear guidelines that govern data use among the brand, supplier, and any third-party technology and/or consultancy firms assisting with the feedback mechanism. Thoughtful plans on data use, data ownership, and data security will help avoid breaches that put vulnerable workers at risk.

### 3. Worker voice data is optimized when plans exist for how that data will drive decision-making

- Strategies for data use and data-driven decision making by businesses will make engaging with worker voice platforms more efficient and productive. How will worker data be used and to what end? Will worker data drive decisions on relationships with suppliers? Will it be used as part of a broader benchmarking effort with suppliers? Third-party responsible sourcing groups with expertise on modern slavery can assist businesses to think through these strategies.
- Where modern slavery risks are identified via worker voice data, the engagement of independent/third-party experts can assist businesses to achieve effective resolution.

### 4. Research and knowledge sharing can build consensus on the utility of worker voice platforms, avoid duplication of efforts, and foster industry wide standards

- Where feedback mechanisms have proven useful and can be replicated, businesses should consider ways to share learnings and processes, promoting a more efficient and collective way to address a shared challenge across an industry.
- More research is needed to understand the effects of worker voice utilization on metrics that affect a company's bottom line, including but not limited to worker productivity, safety, and retention. Such data can help build a compelling business case, moving industries towards more widespread uptake of worker engagement.

Concluding, panelists noted how technology has allowed business to shine a light on the most vulnerable, an issue that is discussed at length in webinar three. Please also join the discussion on this [here](#).

## Additional Resources

- All information on the Webinar Series, compiled by the event organizers [GFEMS](#) and [IOM](#), can be found [here](#).
- For an example of how multi-national, multi-company businesses engage with workers to safeguard against modern slavery, please consult the Li & Fung [policy](#) and their [E-learning tool](#).
- For more information on the Apprise Audit App, please refer to [Apprise Audit Impact Assessment: Detecting labour exploitation in supply chains](#).
- Other examples of how technology can be used to engage the worker voice include [Issara](#) and Ulula.
- For examples of worker support programmes in the garment industry, please consult [the Phulki organisation in Bangladesh](#).