



International  
Labour  
Organization

GLOBAL BUSINESS  
NETWORK ON  
FORCED LABOUR

# ► Eradicating forced labour

What works in practice



# ▶ Eradicating forced labour

What works in practice

Copyright © International Labour Organization 2022  
First published (2022)



This is an open access work distributed under the Creative Commons Attribution 4.0 International License (<https://creativecommons.org/licenses/by/4.0/>). Users can reuse, share, adapt and build upon the original work, as detailed in the License. The ILO must be clearly credited as the owner of the original work. The use of the emblem of the ILO is not permitted in connection with users' work.

**Attribution** – The work must be cited as follows: [ILO Global Business Network on Forced Labour, *Eradicating forced labour: What works in practice.*, Geneva: International Labour Office, 2022].

**Translations** – In case of a translation of this work, the following disclaimer must be added along with the attribution: *This translation was not created by the International Labour Organization (ILO) and should not be considered an official ILO translation. The ILO is not responsible for the content or accuracy of this translation.*

**Adaptations** – In case of an adaptation of this work, the following disclaimer must be added along with the attribution: *This is an adaptation of an original work by the International Labour Organization (ILO). Responsibility for the views and opinions expressed in the adaptation rests solely with the author or authors of the adaptation and are not endorsed by the ILO.*

All queries on rights and licensing should be addressed to ILO Publishing (Rights and Licensing), CH-1211 Geneva 22, Switzerland, or by email to [rights@ilo.org](mailto:rights@ilo.org).

---

ISBN 9789220375365 (Web pdf)

---

The designations employed in ILO publications, which are in conformity with United Nations practice, and the presentation of material therein do not imply the expression of any opinion whatsoever on the part of the ILO concerning the legal status of any country, area or territory or of its authorities, or concerning the delimitation of its frontiers.

The responsibility for opinions expressed in signed articles, studies and other contributions rests solely with their authors, and publication does not constitute an endorsement by the ILO of the opinions expressed in them.

Reference to names of firms and commercial products and processes does not imply their endorsement by the ILO, and any failure to mention a particular firm, commercial product or process is not a sign of disapproval.

Information on ILO publications and digital products can be found at: [www.ilo.org/publns](http://www.ilo.org/publns).

---

Funding is provided by the United States Department of Labor under cooperative agreement number IL-30147-16-75-K-11. Twenty percentage of the total costs of the project or program is financed with Federal funds, for a total of 9,000 dollars. This material does not necessarily reflect the views or policies of the United States Department of Labor, nor does mention of trade names, commercial products, or organizations imply endorsement by the United States Government.

This publication has been produced with the assistance of the European Union. The contents of this publication are the sole responsibility of the International Labour Organization and can in no way be taken to reflect the views of the European Union.

# Message from the chair

---

Globally, there are approximately 27 million victims of forced labour, the majority of which are working in the private sector. This a global scourge and clear violation of human rights and labour rights, and forced labour must be eradicated. Committed stakeholders have been working on preventing and eradicating forced labour for many years, and the present report clearly highlights that a whole of society approach is necessary to make further progress.

While Governments and the private sector are committed to eradicating forced labour, there are difficulties in detecting and measuring it. Data collection and measurement of progress is often sporadic or lacks verification from multiple perspectives, most notably from the perspective of workers or victims. Therefore, it is challenging to know what success looks like as we work towards eradication. An apparent decrease in the number of workers subjected to forced labour may signal poor identification of affected people rather than a true decrease in the incidence of forced labour, and an apparent increase may signal improved identification of affected workers, which is a critical step towards finding solutions.

The private sector is committed to playing its part in eradicating forced labour, and many companies and their representative organizations are looking for the most effective means to eradicate it in different contexts. We know that no company can tackle this challenge alone, given that the root causes of forced labour lie beyond the control of individual companies and include such challenges as informality, lack of access to social protection, weak governance structures, discrimination, humanitarian crises and poverty.

For many years, individual companies, initiatives, multilateral organizations and Governments have been working on preventing and eradicating forced labour and they have significant knowledge of successful approaches. The authors conducted numerous interviews and desk research to gather information on these experiences and collect examples of steps in the right direction. The present paper highlights examples of approaches that gained ground towards eradicating forced labour, taking into account factors that differ across country contexts with the aim of creating a shared understanding of what works.

Through the ILO Global Business Network on Forced Labour, we wish to see a continual increase in the body of knowledge on what works in preventing and eradicating forced labour. This effort will support our collective objective of achieving target 8.7 of the Sustainable Development Goals on the eradication of forced labour and human trafficking by 2030.

We hope the present report is useful to stakeholders in the private sector and Governments in highlighting key actions which could be taken to successfully prevent and eradicate forced labour.



**Douglas Opio**

Steering Committee Chair, ILO Global Business Network on Forced Labour  
Executive Director, Federation of Uganda Employers

## ► Table of Contents

<b>Message from the chair</b>	<b>1</b>
<b>Acknowledgements</b>	<b>3</b>
<b>Abbreviations</b>	<b>3</b>
<b>Introduction</b>	<b>5</b>
<b>Research methodology</b>	<b>8</b>
<b>Key concepts</b>	<b>10</b>
<b>1. Characteristics of forced labour</b>	<b>11</b>
<b>2. Contextual factors</b>	<b>13</b>
<b>3. Eradicating the 11 indicators of forced labour and promoting fair recruitment practices</b>	<b>16</b>
<b>4. Success factors</b>	<b>36</b>
<b>5. Learning across contexts</b>	<b>42</b>
<b>Conclusion</b>	<b>44</b>
<b>Appendix A: Definition of forced labour</b>	<b>45</b>
<b>Appendix B: Further reading</b>	<b>46</b>

## ► Acknowledgements

This report was drafted by Impactt Limited. Particular mention is made of Emma van Dam who drafted the report as well as Dr Maggie Opondo and Malar Odayappan who supported country level engagement.

We would like to sincerely thank all those who participated in the interviews and provided input through the survey. Without your insights this report would not have been possible.

We gratefully acknowledge the guidance provided by Henrik Moller and Houtan Homayounpour. This report was reviewed by a number of colleagues at the International Labour Organization (ILO), and particular thanks is due to the members of the ILO Fundamental Principles and Rights at Work Branch research team and the specialists at the Bureau for Employers' Activities (ILO ACT/EMP). Furthermore, we would like to thank the Steering Committee of the ILO Global Business Network on Forced Labour for guidance in developing and reviewing the research.

## ► Abbreviations

EBMO	employer and business membership organization
GBNFL	Global Business Network on Forced Labour
ILO	International Labour Organization
MNE	multinational enterprise
MRC	Migrant Resource Centre
SMEs	small and medium-sized enterprises
UNGPs	United Nations Guiding Principles on Business and Human Rights
WPS	Wages Protection System



# Introduction

---

In 2008, the United Nations endorsed the Protect, Respect and Remedy Framework for business and human rights, following worldwide consultations with businesses, civil society, governments and victims of human rights abuses. As encapsulated in the United Nations Guiding Principles on Business and Human Rights, the Protect, Respect and Remedy Framework unequivocally recognizes the duty of States and the responsibility of business enterprises:

- States have the duty under international human rights law to protect everyone within their territory and/or jurisdiction from human rights abuses committed by business enterprises. This duty means that States must have effective laws and regulations in place to prevent and address business-related human rights abuses and ensure access to effective remedy for those whose rights have been abused.
- Business enterprises have the responsibility to respect human rights wherever they operate and whatever their size or industry. This responsibility means companies must know their actual or potential impacts, prevent and mitigate abuses, and address adverse impacts with which they are involved. In other words, companies must know—and show—that they respect human rights in all their operations.
- Importantly, corporate responsibility to respect human rights exists independently of States' ability or willingness to fulfil their duty to protect human rights. No matter the context, States and businesses retain these distinct but complementary responsibilities.

The International Labour Organization (ILO) Global Business Network on Forced Labour (GBNFL) brings together businesses of all sizes and sectors, and their networks, from around the globe to eradicate forced labour. Operating across all sectors and geographies, ILO GBNFL members work to engage smaller enterprises, develop resources and tools, and devise local solutions that help shape national frameworks to create lasting change.

While progress has been made on eradicating forced labour over the past few years, much of the knowledge gained rests with individual companies, initiatives and countries. A variety of organizations have highlighted that existing evaluations or studies often have opaque theories of change and measure progress in terms of activities or outputs completed rather than examining programme impact in terms of reduced risk of modern slavery. Further, existing studies primarily focus on the Asia-Pacific region, and there is a lack of understanding of what works in other regions.

As companies increase their efforts to eradicate forced labour, having a shared understanding of what works while taking into account factors that differ across country contexts will help to increase impact and scale. Similarly, the 2030 Agenda for Sustainable Development includes the eradication of forced labour and the end of modern slavery and human trafficking under target 8.7 of the Sustainable Development Goals. Alliance 8.7, a global partnership committed to achieve target 8.7, coordinates global action, research and knowledge sharing and encourages collaboration at all levels. Countries involved in Alliance 8.7 and countries that have ratified ILO Protocol to Convention 29 on Forced Labour implement their action plans on eradicating forced labour and human trafficking, learning from countries with similar contexts to support targeted and effective action.

## ▶ Research questions

Building on existing research, the present study serves to identify and consolidate interventions and approaches that have either demonstrated success or made significant progress towards eradicating forced labour. The aim is to understand why such initiatives have been successful, and identify opportunities for scaling up and replicating initiatives globally, taking into account the different operating contexts of countries and the specific challenges related to fair recruitment and forced labour. The research questions are as follows:

- ▶ Contextual factors: Which contextual factors act as root causes of forced labour and barriers to its eradication?
- ▶ Toolbox 1: Eradicating the indicators of forced labour: what works?
- ▶ Toolbox 2: How do fair recruitment practices help prevent the risk of forced labour?
- ▶ Success factors: What made the identified approaches effective?
- ▶ Potential for replication: How can approaches be tailored to specific country or business contexts?

## ▶ Key considerations

**Initiatives to address forced labour take place within the wider context of a global responsible business conduct landscape.** In addition to the United Nations Guiding Principles on Business and Human Rights, key internationally recognized instruments on responsible business conduct include:

- ▶ Guidelines for Multinational Enterprises and due diligence guidance of the Organisation for Economic Co-operation and Development;
- ▶ Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) of the ILO.

**The requirement for responsible business conduct is also echoed in other standards and instruments,** such as:

- ▶ Performance Standards of the International Finance Corporation;
- ▶ Ten Principles of the UN Global Compact;
- ▶ Global Reporting Initiative;
- ▶ International Organization for Standardization (ISO) 26000 – Guidance on social responsibility.

Many of these instruments reference the ILO Declaration on Fundamental Principles and Rights at Work.

**The global business community is diverse but similar approaches can be used across multinational enterprises (MNEs) and small and medium-sized enterprises (SMEs) to address issues.** Enterprises of the global business community differ in size, capacity and resources dedicated to due diligence practices. The present study has identified a range of initiatives which can be applied to enterprises at different levels:

- ▶ Within its own operations.
- ▶ Within its supply chains, through due diligence on their suppliers, including suppliers of services (such as recruitment services) and suppliers of raw materials.

**The majority of initiatives tackle the formal economy and export-oriented markets.**

- ▶ Almost all initiatives against forced labour noted throughout the report target the formal economy. Given that more than 61 per cent of the world's employed population (2 billion people) work in the informal economy,<sup>1</sup> the vast majority of potential forced labour victims worldwide are outside the scope of relevant protection and remediation efforts. Therefore, it is critical for international and national Governments to share effective approaches for formalizing the informal economy as part of national action plans.
- ▶ Further, the majority of initiatives against forced labour take place in export-oriented markets, with domestic markets largely outside the scope of efforts. It is crucial for national Governments and business associations to require domestic facing companies to implement the same or similar approaches as those taken by exporting companies and support them to meet such requirements.

<sup>1</sup> ILO, "[More than 60 per cent of the world's employed population are in the informal economy](#)", 30 April 2018.

© ILO GBNFL/RosetteJordaan



# Research methodology

---

The research was conducted by Impactt Limited. The study was developed through key phases outlined below.

- ▶ **Desk review.** A range of reports and resources were reviewed to identify key trends to address forced labour within global initiatives, including contextual and success factors where available. The review covered evaluations of programmes targeting forced labour listed in the ILO database, as well as specific programme reports shared by ILO colleagues and other expert stakeholders consulted as part of the study. Desk review further covered a range of regions, as well as literature focusing on the countries discussed in this report.
- ▶ **Baseline survey.** The purpose of the survey was to provide baseline quantitative data on the number of participants that rated certain factors as important, as well as qualitative information. A wide range of stakeholders in government, businesses, workers' organizations and civil society were invited to complete the survey. The participants responded to a range of questions related to initiatives, contextual factors, barriers and success factors which they experienced or identified in their work on forced labour. Questions included checklists of factors identified through the desk review and open-ended questions that allowed respondents to share details on the initiatives they chose to highlight. Nine stakeholders participated, including two representatives from the ILO, six from the private sector (representing primarily MNEs, including global retailers and enterprises in the construction sector) and one non-governmental organization.
- ▶ **Focus groups and interviews.** Semi-structured focus groups and individual interviews were carried out with more than 40 stakeholders, including ILO colleagues, ILO GBNFL members and representatives of governments, business networks, business associations, employers, international organizations, civil society organizations and workers' organizations. These focused on gathering examples of successful interventions, contextual factors, success factors and barriers.
- ▶ **Data analysis.** A thematic analysis of all data gathered through the phases outlined above was carried out. Survey results formed the basis for the top five contextual factors presented in the study, but they were strengthened and adapted in line with the broader thematic analysis across data inputs.



© ILO GBNFL/Morsa Images

## ▶ Limitations

- ▶ **Time limitations.** Given the broad research scope and the time constraints of one to two hours, focus groups and individual interviews prioritized depth over breadth by focusing on a couple of areas with each stakeholder group. Consequently, stakeholders could not respond to all the research areas. However, the baseline survey provided all stakeholders with an opportunity to share their views.
- ▶ **Non-exhaustive coverage.** Desk research yielded a vast range of examples and resource documents, which could not all be reviewed within the scope of the study. This will be considered a living document, which can be updated over time. With the aim of keeping the report digestible, a few key examples have been selected for each section and should be considered indicative rather than exhaustive.
- ▶ **Limited documented success.** There is limited documented evidence of success related to forced labour prevention and remediation activities at the company level, as evidence on approaches in the pilot stage has yet to be collected, while non-disclosure agreements in other cases ensure information remains confidential. The study also draws on the extensive experience of Impactt in working with companies and engaging with workers for examples of what has worked in practice.
- ▶ **Limited ability to conclusively assess success for initiatives.** Without worker testimony that attests to positive impact, ideally obtained through an independent third party, it is not possible to conclusively confirm the success of initiatives. The examples cited in this study generally have not been evaluated by an independent third party.

# Key concepts

---

## ▶ Forced labour

According to the ILO [Forced Labour Convention, 1930 \(No. 29\)](#), forced or compulsory labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

The [11 indicators of forced labour](#), as defined by the ILO, include abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime. The present study explores factors relevant to interventions or actions taken to investigate, prevent or remediate the 11 indicators of forced labour, regardless of whether or not they amount to a forced labour situation as a whole. See Appendix A for further detail on the indicators of forced labour.

## ▶ Success versus ground gained – terminology regarding initiatives

In the present study, an initiative is considered successful if there is evidence that it eradicated forced labour in the context or workplace where it took place. Success can be determined conclusively only through independent third-party verifications based on triangulation of various sources, including interviews with workers.

The global desk review showed that despite progress, such verifications are scarce. The majority of interventions lack independent third-party verification and so conclusive determination of their success cannot be made, but it can be said that such interventions have gained ground towards eradicating forced labour. For example, investment in skills-development initiatives may reduce forced labour in the long-term, by addressing workers' limited livelihood options, which is a key root cause of forced labour.

The study explores a broad range of interventions tackling forced labour globally and interventions were assessed according to the following categories:

- ▶ **Successful prevention of forced labour**, i.e. there was a risk of forced labour, but it was prevented through strategic interventions.
- ▶ **Successful eradication of forced labour**, i.e. forced labour was identified, and interventions removed all of the ILO indicators of forced labour present.
- ▶ **Successful remediation of forced labour**, i.e. forced labour was identified, and interventions provided satisfactory remedy to workers and prevented future reoccurrence through systems-based changes.
- ▶ **Ground gained towards the eradication of forced labour**, i.e. the intervention may contribute towards eradicating a root causes of forced labour, working towards longer-term and deeper change despite there being no or limited measurable impact.

# 1. Characteristics of forced labour

---

## ► Overview

An estimated 17.3 million people were victims of forced labour exploitation imposed by private actors in 2021, according to the ILO report on Global Estimates of Modern Slavery, with most victims suffering multiple forms of coercion from unscrupulous recruiters and/or employers.<sup>2</sup> The report provides the following information on the prevalence of forced labour:

- **Withholding of wages, or the threat of withholding wages**, was the most common means of coercion, experienced by over one third of people (36 per cent) forced to work. This was followed by abuse of vulnerability (21 per cent), some form of direct threat (19 per cent) and financial penalties (9.6 per cent).
- **Debt bondage**, through the manipulation of debt by employers or recruiting agents, affected one-fifth of all victims of forced labour exploitation. Global analysis shows that debt bondage occurs across all sectors but is most prominent in mining, agriculture, and construction, where 43 per cent, 31 per cent, and 27 per cent, respectively, of all forced labour cases involve debt bondage.

Workers are primarily found in situations of debt bondage as a result of the **prohibitive recruitment fees and related costs** imposed on them. These include any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.<sup>3</sup>

In many migration corridors around the world, the majority of migrant workers pay recruitment fees and related costs to obtain employment. Fees and costs vary considerably across different migration corridors but range between 1 and 11 months' earnings (reaching as much as US\$4,400 at 2014 rates).<sup>4</sup> Eliminating fees and costs that frequently result in workers falling into debt bondage and being at increased risk of forced labour remains one of the biggest challenges to fair recruitment globally.<sup>5</sup>

A wide range of other unfair recruitment practices further expose migrant workers to the risks of exploitation and forced labour. These include deception (false promises about salaries and working conditions, or contract substitution), withholding of personal documents, and intimidation and threats.<sup>6</sup>

<sup>2</sup> ILO, Walk Free and IOM, "[Global estimates of modern slavery: Forced labour and forced marriage](#)" (2022).

<sup>3</sup> ILO, "[General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](#)" (2019).

<sup>4</sup> IOM, "[Informing the implementation of the Global Compact for Migration](#)", Data Bulletin No. 9, (2018).

<sup>5</sup> Impactt Limited, "[Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs](#)" (2021).

<sup>6</sup> ILO, Walk Free and IOM, "[Global estimates of modern slavery: Forced labour and forced marriage](#)" (2022).

## ► Interventions to address forced labour

Global recognition of the problem of forced labour has led to the development of a wide range of programmes with the involvement of a many stakeholders, including Governments, enterprises, workers' organizations, international organizations, employer and business membership organizations (EBMOs) and civil society organizations.

For the purposes of the present report, interventions to address forced labour are categorized according to their aims:

- **Identification.** Initiatives focused on identification may include government-level initiatives such as labour inspection, or company-level due diligence activities such as audits and specialized forced labour investigations within its operations or its supply chains.
- **Prevention.** Initiatives focussed on prevention may include the development of new legislation by Governments, intergovernmental strategies to promote and practice fair recruitment, grass-roots level awareness-raising activities for prospective workers in their country of origin and efforts to strengthen the due diligence systems of enterprises and labour recruiters.
- **Remediation.** Initiatives focussed on remediation seek to address or resolve forced labour where it has occurred. Such initiatives include the provision of a remedy (for example, a judicial remedy, compensation payments for harms suffered, or reimbursement of recruitment fees and related costs) and support services (including legal, medical, psychosocial, reintegration, reemployment support) to workers in a forced labour situation.



## 2. Contextual factors

---

All factors beyond intervention itself are considered contextual factors. They are characteristics and circumstances or factors that surround a particular implementation effort.<sup>7</sup> While there are many different types of contextual factors, the present study focuses primarily on structural and proximate factors:

- ▶ Structural factors are found in the broad social, economic and political context, including poverty, inequality and discrimination. Structural factors are often a root cause of forced labour.
- ▶ Proximate factors are policy and governance issues, for example, poor law enforcement and corruption. Proximate factors often act as barriers, preventing the eradication of forced labour.

Thematic analysis of data gathered, including through focus groups and individual interviews, indicates that the following eight contextual factors affect the majority of countries where forced labour presents a significant challenge, acting as root causes and barriers to effective implementation of initiatives. Governments are responsible for taking action to address these issues and create an environment in which the root causes of forced labour are eradicated and effective enforcement of robust legislation and policy can thrive.

### 1. Inadequate and poorly enforced national labour laws.

- ▶ International human rights law and commitments are unevenly ratified and codified into national law, such as through laws protecting migrant workers, or enabling freedom of association. Strong laws prohibiting and penalizing any use of forced labour are an important base from which successful interventions can begin.
- ▶ Corrupt and unscrupulous individuals, enterprises and Governments benefit from exploitative recruitment and employment practices. As a result, incentives for perpetuating practices related to forced labour remain in place, and this will undermine systemic efforts to eradicate forced labour.
- ▶ Governments have the potential to drive effective prevention and elimination of forced labour if labour inspectorates and courts are effectively funded and resourced and if cross-border migration is managed effectively between Governments. However, the opposite is typically the case.
- ▶ Inadequate and poorly enforced national laws, which are not aligned with international legal standards, prevent scalable actions towards eradicating forced labour.

### 2. Inadequate and poorly enforced policy frameworks.

- ▶ Governments often implement a wide range of conflicting policies across different departments, which undermine the effective implementation of existing laws prohibiting forced labour.
- ▶ A coherent policy approach that adequately reflects and addresses the wide array of demand-side and supply-side determinants of forced labour is critical towards building a system of laws and policies that work effectively.
- ▶ Allocation of funding to ensure that policies are properly implemented and enforced is critical, as is coordination between governments to avoid development of conflicting mandates (see point 4).

<sup>7</sup> E. Coles et al., "The influence of contextual factors on healthcare quality improvement initiatives: what works, for whom and in what setting? Protocol for a realist review", *Systematic Reviews* 6, No. 168 (2017).

### **3. Poor knowledge and awareness among Governments about forced labour and how to address it.**

- ▶ Governments and their national law enforcement bodies often lack the knowledge and expertise required to effectively identify forced labour situations, which allows forced labour to thrive unchecked.
- ▶ Further, enforcement bodies often lack the resources (budget and personnel) to ensure standards are implemented as intended, and as a result, resources are focused on a very small part of the economy, leaving large numbers of employers, especially those in the informal economy, unmonitored.

### **4. Poor coordination between government bodies at the national level and countries of origin and destination at the international level.**

- ▶ Poor coordination prevents effective law enforcement. In many countries, prosecution and enforcement bodies operate in silos, thus data, knowledge and relationships which could be leveraged towards effective enforcement are not being used. The Alliance 8.7 Knowledge Platform has high confidence that a siloed approach to forced labour, human trafficking and child labour will have unintended socioeconomic consequences that prevent eradication.<sup>8</sup>
- ▶ While certain regional and national bodies can drive an aligned enforcement approach across nation states, better decision-making capabilities and alignment are needed to support implementation in practice.

### **5. Low access to education and awareness of rights among communities that face vulnerability.**

- ▶ Lack of access to education and skills-development opportunities limits livelihood choices for many workers.
- ▶ Further, a lack of knowledge and awareness of their rights exacerbates the vulnerability of workers to exploitation. A lack of unified and strategic approaches for effectively disseminating rights-based information, including through mainstream teaching curricula and nation-wide information campaigns, was seen as a key barrier to eradicating forced labour.

### **6. Widespread poverty, lack of livelihood options and structural inequality and discrimination.**

- ▶ Poverty is one of the most significant root causes of forced labour. The lack employment opportunities or other options for earning a living is an enduring global challenge.
- ▶ As a result, people are driven to take on any opportunities that arise despite potential risks. In combination with the lack of access to education and information about rights and protections (see point 5), the lack of choice significantly increases many people's vulnerability to exploitation and forced labour.
- ▶ Structural inequality whereby one category of people are attributed unequal status in relation to other categories of people contributes to poverty and marginalization of some workers.

---

<sup>8</sup> Delta 8.7, "Markets Policy Guide", *Delta 8.7 Policy Guides* (2021).

Inequality and discrimination can contribute towards isolation and barriers to accessing services and resources that may be available to support workers. This is further underpinned by social and economic inequality and intersectional factors, including gender, age, race/ethnicity, religion, class, caste, ability, and nationality (migration/citizenship) status. These identity markers vary in their significance depending on the context, for instance, gender may determine eligibility for a particular type of work, with women taking on the majority of work in the domestic sector while men work in the construction sector.

- ▶ Discrimination can be a root cause of forced labour in certain countries or communities, including indigenous peoples or African or Asian peoples whose ancestors were enslaved.
- ▶ Where social protection schemes are absent (for example for workers in the informal economy) or uptake is poor, workers remain vulnerable to exploitation as the lack of safety net can push them to accept forced labour conditions.

## 7. High levels of informality and low regulation of the labour market.

- ▶ Informality is a key factor. In many countries, workers employed in the informal economy do not have the same legal protections as workers in the formal economy. Informal economy workers are often paid in cash and are at greater risk of labour exploitation and forced-labour practices, including non-payment of wages and excessive working hours.
- ▶ Workplaces in the informal economy are seldom inspected by labour enforcement officials, thus informal employers are not held to the same level of accountability as employers in the formal economy.
- ▶ Informal workers have reduced access to formal accountability (judicial systems) and grievance mechanisms, often due to their lack of access to information or due to their isolation. Informal workers may be at risk of deportation and detention, and they may have built up high debts. Interventions targeting forced labour will not succeed in reaching informal workers through social protection schemes or regulatory efforts.

## 8. Workers' lack of access to grievance mechanisms, remedy and representation.

- ▶ The lack of access to grievance mechanisms, remedy and representation hamper efforts to eradicate forced labour. Without effective grievance mechanisms, workers cannot access support (including remedy) when they need it, and there is a lack of visibility of where the indicators of forced labour are prevalent across industries and regions, thereby obstructing the targeting of interventions. Further, lack of access to representation and freedom of association undermines workers' agency, increasing their risk of vulnerability and isolation.

The ways in which the eight contextual factors listed above are interlinked and interdependent is complex, and many countries where forced labour takes place have some or all of these contextual factors. While the eight contextual factors were highlighted as the most significant, further contextual factors play a role in different country settings. In the following section, initiatives are highlighted as having gained ground in countries where some or all of the eight contextual factors manifest. This suggests that effective actions to eradicate forced labour can be taken, despite the contextual factors noted above. However, sustainable change requires root causes to be addressed.

# 3. Eradicating the 11 indicators of forced labour and promoting fair recruitment practices

---

The present section provides examples of effective actions taken at the company level (including labour recruiters) to address the 11 indicators of forced labour. It should be noted that eradicating a single indicator of forced labour on its own does not entail successful eradication of the forced labour situation as a whole.

Toolbox 1 is focused on the first nine indicators of forced labour which typically manifest during employment, although they can also occur during recruitment. The two remaining indicators, namely debt bondage and deception, can be addressed as part of a broad range of actions to address unfair recruitment practices. Policies and procedures to ensure fair recruitment practices are the focus of toolbox 2.

The toolboxes list examples of actions that contribute towards identification, prevention and remediation of forced labour. The examples are non-exhaustive but provide an indication of promising approaches that could be scaled globally based on existing evidence. Key impacts are highlighted for each initiative with case studies linked where available. Some of the examples reflect the experiences of study participants and the author's experience of engagement with enterprises and labour recruiters and more broadly within supply chains across a variety of sectors and countries.

The ILO [General Principles and Operational Guidelines for Fair Recruitment](#) provide a detailed overview of the responsibilities of Governments, enterprises and public employment services in working towards fair recruitment. A range of fair recruitment pilot projects and initiatives have taken place globally, including through the ILO Integrated Programme on Fair Recruitment (FAIR) (Bangladesh, Jordan, Nepal, Qatar), [VINCI/QDVC](#) (Qatar), [Coca Cola](#) (Taiwan, China), [Thai Union](#) (Thailand), [HP](#) (Malaysia) and [Impactt](#) (Malaysia). Learning and data from these initiatives show that effective prevention of unfair recruitment practices typically requires holistic reform of recruitment systems at all levels of the supply chain, including buyers, suppliers and labour recruiters. Since the majority of pilots take a systems-based approach, including various combinations of actions, it is challenging to point to the specific impacts of any single action taken. Instead, therefore, toolbox 2 presents a range of actions that can be combined to effectively address systemic unfair recruitment practices in addition to deception and debt bondage.

Key indicators of forced labour, including deception and debt bondage, usually originate during the recruitment stage. As noted in section 1, workers are primarily found in situations of debt bondage as a result of the prohibitive recruitment fees and related costs they have had to pay to access employment, and deception typically concerns the terms and conditions of their employment.<sup>9</sup> In order to address the indicators of forced labour, it is critical that Governments and enterprises work together to develop fair recruitment systems.

---

<sup>9</sup> ILO, Walk Free and IOM, [“Global estimates of modern slavery: Forced labour and forced marriage”](#) (2022).

## Toolbox 1: Eradicating the indicators of forced labour: What works?

► **Table 1. Forced Labour Indicators**

Click on an indicator to go directly to the related section in Table 2. Eradicating the Forced Labour Indicators: What works?

Indicator	Definition	Indicator	Definition
<b>1</b> <b>Abuse of vulnerability</b>	People who lack livelihood options, knowledge of the local language or laws, belong to a minority religious or ethnic group, have a disability or have other characteristics that set them apart from the majority population are especially vulnerable to abuse and more often found in forced labour.	<b>7</b> <b>Retention of identity documents</b>	The retention by the employer of identity documents or other valuable personal possessions is an element of forced labour if workers are unable to access these items on demand and if they feel that they cannot leave the job without risking their loss.
<b>2</b> <b>Deception</b>	The failure to deliver what has been promised to the worker, either verbally or in writing.	<b>8</b> <b>Withholding of wages</b>	When wages are systematically and deliberately withheld as a means to compel the worker to remain and deny him or her of the opportunity to change employer, this points to forced labour.
<b>3</b> <b>Restriction of movement</b>	Workers who are not free to enter and exit the work premises, or may be locked up and guarded to prevent them from escaping, at work, in their accommodation, or while being transported. Sometimes surveillance cameras or guards are used as a way to control workers.	<b>9</b> <b>Debt bondage</b>	Forced labourers are often working in an attempt to pay off an incurred or sometimes even inherited debt. The debt can arise from wage advances or loans to cover recruitment or transport costs or from daily living or emergency expenses, such as medical costs.
<b>4</b> <b>Isolation</b>	Victims of forced labour are often isolated in remote locations, denied contact with the outside world.	<b>10</b> <b>Abusive working and living conditions</b>	Work may be performed under conditions that are degrading (humiliating or dirty) or hazardous (difficult or dangerous without adequate protective gear), and in severe breach of labour law. Forced labourers may also be subjected to substandard living conditions, made to live in overcrowded and unhealthy conditions without any privacy.
<b>5</b> <b>Physical and sexual violence</b>	Violence can include forcing workers to take drugs or alcohol so as to have greater control over them. Violence can also be used to force a worker to undertake tasks that were not part of the initial agreement. Violence is not acceptable as a disciplinary measure under any circumstances.	<b>11</b> <b>Excessive working hours</b>	Forced labourers may be obliged to work excessive hours or days beyond the limits prescribed by national law or collective agreement. They can be denied breaks and days off, having to take over the shifts and working hours of colleagues who are absent, or by being on call 24 hours a day, seven days a week.
<b>6</b> <b>Intimidation and threats</b>	Common threats used against workers include denunciation to the immigration authorities, loss of wages or access to housing or land, sacking of family members, further worsening of working conditions or withdrawal of "privileges" such as the right to leave the workplace.		

► **Table 2. Eradicating the Forced Labour Indicators: What works?**

1 Abuse of vulnerability		Back to list of indicators	
Example actions	Actor	Evidence of impact	Resource
<b>1.1 Review recruitment and employment practices to identify potential abuse of vulnerability and implement solutions.</b>			
A company implemented an improved system for logging work permit expiry dates and allocated responsibility for keeping renewals up to date.	<ul style="list-style-type: none"> <li> Companies</li> <li> Labour recruiters</li> </ul>	Follow-up assessments showed this reduced the number of undocumented workers.	
<b>1.2 Provide awareness-raising training to workers both during recruitment and employment to ensure they are aware of their rights and how to seek assistance in case rights are violated.</b>			
<p>For example, Migrant Resource Centres (MRCs) provide information on migrating for work and offer assistance to workers seeking justice and remediation. MRCs are run by entities, including local labour departments, trade unions and other civil society organizations, and they are located in countries of origin and destination.</p> <p>MRCs in countries of origin provide referrals for returned migrants who may want to pursue legal claims against their recruiters or employers, or assist those looking for jobs, either locally or in another country. MRCs may additionally partner with other types of service providers to offer language lessons, medical or health checks, and vocational or financial skills training. For migrants who have been victims of violence, abuse, exploitation or trafficking, MRCs can offer services and referrals for particular rights violations. MRCs provide an essential service to women, particularly those who have experienced gender-based violence or harassment.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	An MRC with the General Federation of Jordan Trade Union worked with the Jordanian Ministry of Labour to provide legal assistance in 182 cases in 2019. The cases mainly involved physical and sexual abuse by employers or recruitment agencies and/or withholding of salaries and confiscation of passports.	See <a href="#">Triangle ASEAN supported MRC and Organizing women migrant workers: Manual for trade unionists in ASEAN</a> .

[Back to list of indicators](#)

**1 Abuse of vulnerability**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**1.3 Establish individual and collective grievance mechanisms which are available to workers during recruitment and employment, as well as social dialogue at the workplace.**

<p>For example, Impactt piloted a programme focused on building individual and collective grievance mechanisms for migrant workers across numerous worksites. These workers were excluded from formal collective bargaining processes by law.</p> <ul style="list-style-type: none"> <li>► Helplines were in eight languages and a social dialogue programme supported the development of a workers committee with representatives of all nationalities, freely and democratically elected by workers.</li> <li>► The programme included RESTART training, which uses approaches from social psychology to help management, supervisors and workers understand each other's perspectives.</li> </ul>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>Interviews with workers showed that:</p> <ul style="list-style-type: none"> <li>► The helpline provided individualized support to resolve cases in collaboration with management. It was considered particularly useful for sensitive individual issues, including disagreements with supervisors.</li> <li>► The workers committee raised systemic issues across nationality groups and provided space for workers and management to brainstorm solutions.</li> </ul> <p>Management reported that having the same issues reported across nationalities conveyed the systemic nature of labour conditions on site.</p> <p>Strengthened social dialogue mechanisms had the following results:</p> <ul style="list-style-type: none"> <li>► Workers had increased ability to speak up and get support to resolve issues, both individually and with peers.</li> <li>► Abusive behaviour by supervisors, including threats and intimidation, was reduced. Workers who had been isolated now had direct and frequent contact with management.</li> <li>► Feelings of safety at the workplace and respect between workers, supervisors and management increased. "Rehumanization" exercises enabled workers and managers to swap roles and "walk a mile" in each other's shoes.</li> </ul>	
--	---	--	--

[Back to list of indicators](#)

**1 Abuse of vulnerability**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**1.4 Provide life skills training to workers (e.g. on financial management, negotiation skills, computer literacy, cultural knowledge, language skills, health and nutrition, leadership, etc.)**

UP! financial literacy programme	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> </ul>	As a result of the UP! financial literacy programme the number of women who felt like they have some control over their finances has risen from 67 to 99 per cent, with the number saying they have no control dropping from 22 to 1 per cent. See case study for further evidence of impact.	See <a href="#">Impactt, Awaj Foundation and C&amp;A Foundation's UP! Flagship programme case study</a> (Global).
----------------------------------	--	---	---

**2 Deception**

Deception usually originates during the recruitment stage, see [toolbox 2](#).

**3 Restriction of movement**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**3.1 Review recruitment, employment and worker management practices to identify and remove any potential restrictions on workers' freedom of movement. This includes the use of government mandated movement control orders (e.g. due to COVID-19) if these are being used in a manner to exploit a workforce exposed to vulnerabilities. Engage in social dialogue between workers and site management to identify reasonable safety measures.**

<p>For example:</p> <ul style="list-style-type: none"> <li>► At the workplace: use of "exit" or "toilet break" passes or other restrictions should be removed, instead identifying other mechanisms to address any production pressures which are typically the root cause of restrictions.</li> <li>► At workers' accommodation, if provided: ensure workers can enter and exit freely, identifying mechanisms (e.g. sign-in/out logs) and providing safety advice to workers where concerns exist.</li> </ul>	<ul style="list-style-type: none"> <li> Companies</li> <li> Labour recruiters</li> </ul>	Impactt engaged in constructive dialogue with an employer to understand why they imposed restrictions, and then supported the employer to engage in social dialogue with workers to identify solutions suitable to their context, and this resulted in success.	
---	--	---	--

[Back to list of indicators](#)

## 4 Isolation

Example actions	Actor	Evidence of impact	Resource
<b>4.1 Set up effective grievance mechanisms and provide access to worker representatives or workers organizations (with relevant language skills) to reduce isolation.</b>			
Access to trusted grievance mechanisms in workers' own languages (e.g. helplines, worker representatives), enables workers to seek help when they need it, even when they are based in remote and isolated locations.	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>		
<b>4.2 Set up social dialogues to address low access to education and awareness of rights among communities that face vulnerability.</b>			
<p>This approach was used in agricultural contexts.</p> <ul style="list-style-type: none"> <li>► Most participants recognized workers' lack of access to education and skills-development opportunities limit livelihood choices.</li> <li>► Lack of knowledge and awareness of their rights exacerbates workers' vulnerability to exploitation. A lack of unified and strategic approaches for effectively disseminating rights-based information, including through mainstream teaching curricula and nation-wide information campaigns, is a key barrier to reducing vulnerability.</li> <li>► Workers and management should identify structured mechanisms to enable workers to leave the premises on a regular basis, free of company chaperones. For premises in isolated locations, employers can provide workers with regular free transport to the nearest towns and amenities.</li> </ul>	<ul style="list-style-type: none"> <li> Companies</li> </ul>	Anecdotal evidence and worker testimony suggests that having open dialogue on isolation and providing inputs on ways in which it could be relieved has enhanced their sense of agency.	
<b>4.3 Engage with government and business partners to improve infrastructure access such as information technology network and roads that will enable workers to have contact with family and friends, as well as access to transportation, cultural activities and health benefits.</b>			
Workers perceive access to the Internet and phone network as a key factor that helps to decrease levels of isolation and vulnerability, as they feel they are able to contact family and friends.	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> </ul>		

[Back to list of indicators](#)

## 4 Isolation

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

## 4.4 Integrate businesses and communities where possible, as opposed to developing isolated industrial areas.

By integrating businesses in existing communities, workers are less isolated, as they can remain with their families, and/or can access better infrastructure and support networks. In Uzbekistan, for example, the government is creating textile clusters, wherein companies vertically integrate agricultural harvesting and industrial production in one location within existing communities.

While recognizing that Uzbekistan's efforts to eradicate state-imposed forced labour are relatively unique, this report draws on examples which may be applicable in other countries/contexts.

 Governments  
 Companies

Anecdotal evidence suggests that this model may be promising for countries that can set up similar structures. As a result of the vertically integrated approach, workers will be able to continue living at home, significantly reducing their risk of vulnerability. Employers, reliant on and integrated within the local community will be incentivized to promote good relationships, which creates increased social dialogue and engagement overall.

## 5 Physical and sexual violence

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

## 5.1 Introduce specific company policies on violence and harassment and socialize these with all employees.

Various model codes, guidelines and policies have been adopted by governments, sometimes the judicial system and increasingly, employers' and workers' organizations.

 Companies  
 Labour recruiters

Although only limited information is available, the number of employers having introduced policies on sexual harassment appears to have increased in both industrialized and developing countries, especially in larger enterprises. A survey conducted in 1999 found that since the amendment of the laws in Japan to cover sexual harassment, 71 per cent of respondent companies with 1,000 or more employees had implemented measures against sexual harassment.

See ILO, [Action against Sexual Harassment at Work in Asia and the Pacific \(2001\)](#).

[Back to list of indicators](#)

**5 Physical and sexual violence**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**5.2 Identify gender risks through gender-specific impact assessments.**

For example, Suitsupply conducted impact assessments and gender and sustainability performance of top ten suppliers.	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	The impact assessments, conducted by Suitsupply, identified certain issues but no further detail on impact is available at the company level.	See <a href="#">Suitsupply (global)</a> .
--	---	---	---

**5.3 Use disaggregated data to inform initiatives and targets that aim at reviewing and removing unequal power dynamics in recruitment and employment processes and throughout the supply chain, as well as the specific risks by sector.**

For example, Esprit analysed workforce profile data to better understand the gender distribution of employees and management in factories in India, Bangladesh, and Ukraine. The baseline study revealed that factories in India have 6 per cent female line supervisors, whereas the total female workforce is 31 per cent. The company set a goal to help their suppliers achieve a percentage of female line supervisors that aligns with its overall percentage of female workers.	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>		See <a href="#">Esprit (India, Bangladesh and Ukraine)</a> .
--	---	--	--

**5.4 Prevent and address sexual harassment and abuse in factories through the development and establishment of independent investigative organizations or gender committees to receive complaints from workers, carry out investigations and assessments, and enforce appropriate remedies in consultation with workers, workers' organizations, and in accordance with the law.**

<p>Where specific gender committees are not feasible, worker representatives that are part of broader worker committees can be trained to engage on gender perspectives (issues and solutions).</p> <p>The Van Den Berg RoseS implemented gender committees.</p>	<ul style="list-style-type: none"> <li> Companies</li> </ul>	<p>The Van Den Berg RoseS gender committees had the following results:</p> <ul style="list-style-type: none"> <li>► All cases of sexual harassment and other gender-based violence get fully investigated by the committee;</li> <li>► More disciplinary action is taken against perpetrators;</li> <li>► Employees report better working conditions and reduced cases of gender-based violence;</li> <li>► Reduced absenteeism;</li> <li>► There is an increased number of women in leadership positions as they are not frequently being harassed and overlooked for promotions.</li> </ul>	See the approaches used by <a href="#">Van Den Berg RoseS (Kenya)</a> and <a href="#">Levi Strauss &amp; Co (Lesotho)</a> and case studies on the <a href="#">Gender-Responsive Due Diligence platform</a> .
--	---	---	--

[Back to list of indicators](#)

**5 Physical and sexual violence**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**5.5 Prevent and address physical and sexual violence through capacity-building programmes.**

<p>For example, BSR HERproject in Asia, Africa and Latin America reached 1,225,000 low-income women across 17 countries working in 1,000 factories and farms, and in partnership with over 60 international companies.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>BSR HERproject had the following results:</p> <ul style="list-style-type: none"> <li>► 65 per cent increase across 40 farms in Ethiopia in number of farms drafting and establishing a Gender Policy;</li> <li>► 85 per cent increase across 40 farms in Ethiopia in number of farms establishing a Gender Committee;</li> <li>► 40 factories enrolled in the HERfinance payroll digitization programme, reaching nearly 100,000 women.</li> </ul>	<p><a href="#">BSR HERproject (Asia, Africa and Latin America)</a></p>
--	---	---	--

**5.6 Provide awareness raising and sensitization activities on physical and sexual violence to all workers and staff.**

<p>The Alliance for Filipino Workers negotiated agreements which included training and awareness raising and new guidelines to tackle third-party violence. This illustrates how a strategy to reframe violence and harassment as an occupational health issue and a business performance issue could emphasize this as a priority issue.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> </ul>	<p>Direct evidence of reduction of physical and sexual violence as a result of training could not be identified, but recommendations from the ILO suggest that such activities are valuable.</p>	<p>Training guidance is highlighted in the ILO report on <a href="#">action against sexual harassment at work in Asia and the Pacific</a>; see also <a href="#">Organizing women migrant workers: Manual for trade unionists in ASEAN</a>.</p>
---	--	--	--

[Back to list of indicators](#)

**6 Intimidation and threats**

Example actions	Actor	Evidence of impact	Resource
<p><b>6.1 Train and/or brief workers to recognize intimidation and build an environment in which they feel confident to report it. As practices related to worker intimidation can often be hidden and difficult to identify, spending time talking to workers in a confidential environment, and through various social dialogue channels to understand whether any intimidation is taking place is most likely to support effective identification. Where intimidation practices are identified, take disciplinary action against the relevant perpetrators and ensure workers are protected from further harm.</b></p>			
<p>Impactt piloted a project to build social dialogue</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>An assessment of the Impactt pilot social dialogue mechanisms found that it resulted in a reduction of abusive behaviour (including threats and intimidation) from supervisors across numerous sites. Workers believe this is largely because those who had been isolated now have direct channels to report to management.</p>	

**7 Retention of identity documents**

Example actions	Actor	Evidence of impact	Resource
<p><b>7.1 Require all companies to ensure workers hold their own identity documents, and provide them with safe storage which they can access at any time. Governments should enshrine this requirement in laws which prohibit and penalise retention of identity documents and require provision of safe storage.</b></p>			
<p>See for example Malaysia's Workers' Minimum Standards of Housing and Amenities (Amendment) Act 2019 (Act 446) which requires: "A locked cupboard (measuring a minimum 0.35 m long, 0.35 m wide, 0.9 m high) for an employee's valuables, including their passport. The employee must be able to access their possessions at any time."</p> <p>Earthworm Foundation started a Passports in their Palms initiative in 2017, supporting SMEs to provide all workers with lockers for safekeeping of their passports.</p>	<ul style="list-style-type: none"> <li> Governments</li> </ul>	<p>Anecdotally, workers report feeling greater peace of mind, more engagement and less discrimination.</p> <p>Evidence across several sources suggests that when passports are returned, workers feel safer and freer. Although employers fear that workers will run away once their passports are returned, in practice the number of workers that run away is very small, even where effective remediation programmes are not yet in place. Workers provided with a secure locker are much happier to keep these documents.</p>	

[Back to list of indicators](#)

**7 Retention of identity documents**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**7.2 Awareness-raising campaigns for employers on why passport retention is prohibited and how they can provide appropriate safe and accessible storage.**

<p>Awareness-raising campaign by the Malaysian Employers Federation</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> <li> Other stakeholders including EBMOs</li> </ul>	<p>Anecdotal evidence suggests that awareness raising activities by the Malaysian Employers Federation has gained ground and an increasing number of employers are taking appropriate measures to address document retention.</p>	
---	---	---	--

**8 Withholding of wages**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**8.1 Implement digital wage payment systems and/or mobile applications to accurately register working records and payments.**

<p>For example, the <a href="#">Wages Protection System (WPS)</a>, a digital mechanism for government oversight of payments, was introduced in 2009 in the United Arab Emirates. All employers covered by labour law are required to transfer employees' wages through the WPS ensures that workers are paid fully and on time.</p> <p>For employees without a bank account, money exchanges provide cost-effective WPS-compliant payroll solutions. Employers can transfer funds for salary disbursement to the exchange. The exchange provides WPS cards to employees, which they can then use to access their salary.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>Qatar has implemented WPS, and audits show a 10 per cent improvement in wage-related compliance between 2018 and 2021.</p>	<p>See MFASIA, "<a href="#">Crying out for Justice: Wage theft against migrant workers during COVID-19 – An analysis report on wage theft cases documented by MFA members and partners</a>" (2021).</p>
--	---	---	---

## 8 Withholding of wages

Example actions	Actor	Evidence of impact	Resource
<b>8.2 Use alternative mechanisms for digital payments where workers do not have personal bank accounts.</b>			
In 2021, Saudi Arabia implemented a process for SMEs to deposit workers' salaries in e-wallets instead of bank accounts. SMEs need to register in the ministry-approved Madad platform and deposit salaries of workers who are not registered in the WPS and do not have personal bank accounts.	<ul style="list-style-type: none"> <li> Companies</li> <li> Labour recruiters</li> </ul>	The Madad platform performs multiple roles including proactively detecting violations of WPS, following up on the status of salaries, and exploring the possibility of paying salaries more than once in a month. The fee for registration and utilization of the platform services amount to SR460 per year for small establishments with nine workers or less.	See Saudi Gazette, " <a href="#">Ministry allows deposit of wages in e-wallets</a> ", 14 September 2020.
<b>8.3 Ensure copies of payslips are provided to workers, with full information on hours worked, wages and rates paid, and any deductions.</b>			
	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	Experience and interviews with workers across regions shows that providing payslips which are clearly understood is critical in supporting workers to verify that their pay is correct, and empowering them to raise grievances if they find it is not.	
<b>8.4 Engage with suppliers that are withholding wages to identify root causes and solutions. Buyers, as well as civil society organization partners are often well placed to do this.</b>			
<p>In many cases withholding of wages is a result of cash-flow challenges faced by the employer. Engagement with such employers (for example by buyers) can support the identification of the cause of cashflow issues. These might include for example poor business management, or underfunding of contracts.</p> <p>Through engagement buyer(s) and suppliers can identify a long-term plan for ensuring such issues do not reoccur together.</p> <p>Where appropriate, and where state mechanisms do not exist, buyers may fund repayment of workers' wages pending the ability of the supplier to pay these out.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>In Qatar, for example, Impactt verified that main contractors made outstanding wage payments while their sub-contractors were unable to.</p> <p>Anecdotal evidence further suggests that demands to pay everything back in one go may not be feasible. Where this is the case, and no other support mechanisms exist, phased repayment plans can be agreed upon, for example repaying minimum wages at first, following by overtime and benefits once financing becomes available.</p>	See " <a href="#">Annual External Compliance Report of the Supreme Committee for Delivery and Legacy's Workers' Welfare Standards</a> ", February 2020 (p. 33).

[Back to list of indicators](#)

## 8 Withholding of wages

Example actions	Actor	Evidence of impact	Resource
<b>8.5 Provide destination country government support to pay withheld wages in an expedited manner via a resourced government-facilitated insurance fund.</b>			
According to the ILO, insurance funds can directly compensate workers in case of non-payment, subsequently seeking reimbursement from companies responsible, through separate proceedings. Effective provision of justice to workers requires action by ministries of labour and ministries of justice in strengthening their administrative capacity, ensuring access to free translation and interpretation, facilitating power of attorney procedures, providing legal aid, and encouraging workers to come forward to register their labour complaints.	 Governments	The mobile court of Abu Dhabi recently paid 261 million Dirhams worth of unpaid wages to 26,000 workers for grievances filed from January to June of 2020.	<a href="#">ILO research on wage protection of migrant workers in the Arab States</a>
<b>8.6 Ring-fence end-of-service benefits over the course of the worker's service in a separate account that the employer cannot use and is easily accessible when the worker departs.</b>			
Employers withholding end-of-service benefits or wages is a common abuse of workers, as recently identified by the ILO. Buyers can engage with their suppliers to request payment systems whereby these benefits are ring-fenced, creating payment security.	 Companies  Labour recruiters	No documented evidence of impact was identified.	<a href="#">ILO research on wage protection of migrant workers in the Arab States in the context of COVID-19.</a>

## 9 Debt bondage

Debt bondage usually originates during the recruitment stage see [toolbox 2](#).

[Back to list of indicators](#)

**10 Abusive working and living conditions**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**10.1 Improve housing so that standards are in line with local legislation or international norms.**

<p>The ILO has provided guidance on workers housing in addition to national legislation.</p> <p>Impactt audits in Qatar assessed the quality of workers' accommodations.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>In Qatar, where food, laundry services, wireless Internet access and other free services were provided, there was a 16 per cent increase in workers reporting that they could cover their families' basic needs.</p>	<p>See <a href="#">ILO on workers' housing</a>.</p> <p>See "<a href="#">Annual External Compliance Report of the Supreme Committee for Delivery and Legacy's Workers' Welfare Standards</a>", February 2020 (p. 32)</p>
--	---	---	---

**10.2 Carry out training to enhance effective and respectful communication between workers and supervisors, including around workplace safety risks.**

<p>Impactt trainings across several construction sites focused on building improved respect and communication between supervisors and workers.</p>	<ul style="list-style-type: none"> <li> Companies</li> </ul>	<p>At one site in the Middle East, training of 24 health safety, security and environment supervisors and 32 supervisors resulted in:</p> <ul style="list-style-type: none"> <li>▶ Increase in reporting of unsafe behaviour (31 per cent)</li> <li>▶ Decrease (65 per cent) in the number of observed unsafe behaviours (hand injury prevention)</li> <li>▶ Increase in workers' feeling of respect and confidence to speak up about safety concerns.</li> </ul>	
--	---	---	--

[Back to list of indicators](#)

**11 Excessive working hours**

Example actions	Actor	Evidence of impact	Resource
-----------------	-------	--------------------	----------

**11.1 Increase productivity and wages while reducing working hours, based on consultations with workers and management, through process improvements, production incentives, and human resource management, including a workers' committee.**

<p>For example, New Look enabled its suppliers to bring in industrial engineering experts to help streamline manufacturing processes at factories. New Look also enhanced its own buying practices through improved forecasting, thereby providing longer lead times for factory managers.</p>	<p> <a href="#">Companies</a></p>	<p>New Look actions helped to prevent last-minute orders that often required employees to work longer hours to meet short deadlines.</p> <p>In turn, this enabled the factories to better manage production. After consultations with factory workers, Bangladeshi suppliers also introduced benefits packages to workers – including measures such as additional medical care, childcare facilities, a matching provident fund, better quality meals, bonuses for improved attendances and a production incentive scheme. The direct benefits for the Bangladeshi suppliers were greater efficiency and productivity, reduced absenteeism and reduced staff turnover.</p>	<p>See <a href="#">New Look (Bangladesh)</a>; <a href="#">Marks &amp; Spencer (Bangladesh)</a>.</p>
--	--	--	---

**11.2 Analyse and revise working hours systems to deal with embedded high overtime culture.**

<p>For example, excessive overtime at Unilever site resulted in long work hours and high sickness levels.</p> <p>Working Time Solutions used shift planning, rostering and workforce management software and consultancy to design shift patterns that met seasonal peaks in demand and stated the hours to be worked over a year instead of each week, building in 'reserve hours' to meet unexpected peaks in demand.</p>	<p> <a href="#">Companies</a></p>	<p>As a result of implementing Working Time Solutions:</p> <ul style="list-style-type: none"> <li>▶ Manufacturing efficiency increased by 30 per cent</li> <li>▶ Production waste was reduced by 50 per cent</li> <li>▶ Employee absences were halved</li> <li>▶ Workforce management administration time was reduced by 25 per cent</li> <li>▶ Reduced overtime resulted in cost savings</li> <li>▶ Clocking on/off procedure was abolished</li> </ul>	<p>See <a href="#">Unilever's use of Working Time Solutions (United Kingdom)</a>.</p>
---	--	---	---

## Toolbox 2: How do fair recruitment practices help prevent the risk of forced labour?

Example actions	Actor	Evidence of impact	Resource
<b>Company policies and procedures</b>			
<p><b>Adopt a fair recruitment (including a zero recruitment fees and related costs) policy</b> which is aligned to the ILO General Principles and Operational Guidelines for Fair Recruitment and includes clear guidelines for implementation. The policy should be communicated externally via guidelines and other means, including contracts to all prospective and current business partners and relevant stakeholders. It should clearly stipulate that workers do not pay recruitment fees pre-, during or post-employment.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		<p>ILO, <a href="#">Promising Practices: Zero Recruitment Fee Policy for (Migrant) Workers in Jordan and Mexico: Fair Recruitment Practice by Recruitment Agency adapted to COVID-19</a>.</p>
<b>Strengthen due diligence</b>			
<p><b>Build a transparent overview of all actors involved in the recruitment of workers.</b> The first step is mapping all actors involved in the supply chain (e.g. labour recruiters in destination and origin country, sub-agents). For companies and labour recruiters, this can include requiring business partners to provide a list of all labour recruiter or sub-agents involved in the process (and evidence that they are legally registered businesses).</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		<p>See Ellen Zimiles, Alma Angotti, Tim Mueller and Balki Aydin, “Using Technology to Battle Forced Labor in Supply Chain”, Guidehouse (2020).</p> <p>Tools such as <a href="#">Diginex’s LUMEN tool</a>.</p>
<p><b>Carry out comprehensive human rights due diligence assessments of recruitment business partners.</b> Such assessments should focus on assessing whether or not business partners’ recruitment practices rely on any unfair practices (e.g. charging of recruitment fees, document retention, deceiving workers about the terms and conditions of employment).</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		<p><a href="#">Responsible Business Alliance</a> provision of training and tools to support members to identify and address risks.</p>

Example actions	Actor	Evidence of impact	Resource
<p><b>Support company, labour recruiter and sub-agent capacity-building.</b> Providing capacity-building support to companies and labour recruiters based on gaps identified during human rights assessments is critical to achieving long-term improvements.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>A pilot by ILO showed that technical support provided to labour recruiter and sub-contractor management and staff regarding the implementation of a fair recruitment system led to a 92 per cent reduction in the average costs of worker-paid recruitment fees.</p>	<p><a href="#">ILO Promising Practices: Piloting Fair Recruitment From Bangladesh To Qatar In The Construction Sector</a></p>
<p><b>Increase direct involvement and closely monitor every step of the recruitment process.</b> Send human resources and technical teams to recruitment drives to monitor partners' compliance with company policies and expectations, communicate directly with applicants about the absence of recruitment fees, and review and participate directly in recruitment interviews and trade tests. Where companies do not have capacity to do this, partnerships with civil society organizations, or other companies with shared labour recruiters are also possible.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>Supplier companies noted this was particularly effective.</p>	
<p><b>Develop third-party independent, human rights based monitoring of recruitment within communities of origin.</b> Partnerships with civil society, community or faith-based organizations in migrant workers' home countries can be an effective means of monitoring the recruitment process and providing a dedicated grievance mechanism pre-departure, especially where companies or suppliers are not able to dedicate resources on the ground themselves. Involvement of such organizations, where trusted by migrants, increases the likelihood that exploitation will be reported.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>Thai Union engaged with Migrant Workers Rights Network, a membership-based civil society organization for migrant workers from Myanmar.</p>	<p>See the report of the <a href="#">Ethical Recruitment pilot</a></p>
<p><b>Require disclosure of recruitment partners and key practices.</b></p> <p>Request disclosure of names and licenses of all affiliated labour recruiters, agents and sub-agents to increase transparency.</p> <p>Suppliers may request labour recruiter or sub-agent partners to share all job adverts used to promote jobs and check these to ensure correct information is provided.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		

Example actions	Actor	Evidence of impact	Resource
<p><b>Interview workers on arrival and post-arrival</b> (within 3-6 months) in a safe and confidential environment, to provide them the opportunity to disclose details around any recruitment fees and costs paid, and/or any intimidation faced.</p> <p>Since companies rarely achieve “zero recruitment fees” within one recruitment cycle, such interviews provide valuable insights which can improve overall engagement with labour recruiter partners.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>Impactt experience shows that many workers do not feel comfortable disclosing fees paid when they first arrive, for fear of losing their job. Clients that carried out post-arrival interviews after several months found that workers felt more secure and were more likely to open up.</p>	
<p><b>Establish contracts or service-level agreements with recruitment business partners</b></p>			
<p><b>Suppliers may contract directly with source country labour recruiters where possible.</b> Eliminate use of sub-agents or intermediaries to reduce the number of actors involved.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		<p>See <a href="#">ILO Promising Practices: Nepal – Jordan Corridor Fair Recruitment Pilot</a></p>
<p><b>Establish service-level agreements</b> with suppliers, labour recruiters and sub-agents which clearly communicate that the costs of recruitment are covered by the company and that workers should not pay fees as part of the recruitment process.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>Impactt experience suggests that revision of contracts has significantly contributed to the reduction of fees and other exploitative practices.</p>	
<p><b>Engage with labour recruiters and/or sub-agents to understand their</b> costs and profit margin in detail and pay agents sufficient service fees (administration and/or profit margins) to reduce risk of fee-charging to workers.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>For example VINCI/QDVC financial analysis justified including the cost of workers’ resignation and/or early repatriation in a trusted partner’s service fee.</p>	<p>See <a href="#">VINCI/QDVC</a></p>
<p><b>Pay service fees to labour recruiters up front</b> to reduce risk of fee charging to workers – as all costs are borne by the recruitment agency prior to the candidates starting work.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		

Example actions	Actor	Evidence of impact	Resource
<b>Provide candidates with clear information on the recruitment process and their prospective employment</b>			
<p><b>Raise migrant workers’ awareness of their right to fair recruitment through community engagement.</b></p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Trade unions</li> <li> Civil society organizations</li> </ul>		<p>See ILO Promising Practices: <a href="#">Raising Pakistani migrant workers’ awareness of their right to fair recruitment.</a></p>
<p><b>Raise migrant workers’ awareness of their rights</b> and how to seek support both pre- and post-arrival by introducing mandatory orientation programmes.</p> <p>Mandatory post-arrival orientation can help to raise awareness of workers’ rights, cultural information and access to grievance mechanisms, however, the quality of programmes must be aligned to ensure effectiveness.</p>	<ul style="list-style-type: none"> <li> Governments</li> <li> Companies</li> <li> Labour recruiters</li> </ul>	<p>For example, the Government of Singapore only issued work permits to migrant workers who completed mandatory one-day orientation within two weeks of arrival.</p>	<p>See Government of Singapore <a href="#">Settling-in Programme.</a></p>
<p><b>Provide clear communication to workers – both verbally and in writing – regarding recruitment and employment.</b></p> <ul style="list-style-type: none"> <li>► Prepare flyers for candidates which show the timelines of every stage in the recruitment process.</li> <li>► Improve offer letters provided to workers by labour recruiters, and train labour recruiters and sub-agents on how they should communicate key terms and conditions with workers.</li> <li>► Ensure that written contracts of employment are provided to workers, and that these are transparent and understood. Prevent contract substitution by increasing transparency of recruitment and employment processes, including through use of technology solutions.</li> </ul>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		<p>Ellen Zimiles, Alma Angotti, Tim Mueller and Balki Aydin, <a href="#">“Using Technology to Battle Forced Labor in Supply Chain”</a>, Guidehouse (2020).</p> <p>Examples of technology solutions include eMin (blockchain), or Diginex’s <a href="#">LUMEN</a> tool.</p>
<p><b>Maintain involvement with workers after recruitment</b> is completed, to provide them with opportunities to disclose the payment of fees, if applicable.</p>	<ul style="list-style-type: none"> <li> Suppliers</li> <li> Labour recruiters</li> </ul>		

Example actions	Actor	Evidence of impact	Resource
<p><b>Provide access to grievance mechanisms during recruitment</b></p>			
<p><b>Provide access to a third-party helpline</b> to all candidates during their recruitment journey, and ensure that they know to report any fee payment requests or other forms of recruitment-related exploitation to the helpline.</p> <p>During recruitment drives, some companies provide a number that leads directly to a designated contact or human resources. Candidates were encouraged to call the number to prove it works.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>Anecdotal evidence from companies suggests that the provision of such a helpline (either by the company, or a third party) enables better identification of fee-charging and other exploitative practices, early on in the recruitment process.</p>	
<p><b>Remediate debt bondage caused by worker-paid recruitment fees</b></p>			
<p><b>Reimburse recruitment fees and related costs to all affected workers.</b> The repayment of recruitment fees and costs ameliorates or even eliminates severe debt bondage that contributes to forced labour.</p>	<ul style="list-style-type: none"> <li> Companies</li> <li> Suppliers</li> <li> Labour recruiters</li> </ul>	<p>Evidence from Impactt remediation programmes shows that workers felt:</p> <ul style="list-style-type: none"> <li>► Able to repay outstanding debts and recruitment fees, and/or invest and save for a better future.</li> <li>► Increased respect at the workplace and, crucially, they understood what the repayments were for.</li> <li>► Able to report issues more freely because they saw positive impacts from repayment remediation.</li> </ul>	

## 4. Success factors

---

What made the initiatives presented in section 3 effective at gaining ground towards eradicating forced labour? Given the wide range of initiative types and actors involved, the specific success factors depend on the case and context. However, a range of overarching success factors apply across initiatives and contexts. In the present section, success factors are presented by level:

- Government level;
- Company level;
- Across all levels.

### ► Success factors at the government level

At the government level, the following key success factors were identified as contributing to significant ground gained towards eradicating forced labour.

**Effective domestic resource mobilization.** While international funding and support towards eradicating forced labour is important, effective domestic resource mobilization is key to finance core interventions independently, and this is often lacking. Governments with well-developed domestic resource mobilization practices can share technical knowledge with others, for example, on the development of effective social security and protection systems.

**Public recognition of issues related to forced labour** at the highest level of Government, and **political will** to drive a comprehensive and ambitious reform agenda. In Uzbekistan, for example, recognition from high-ranking officials enabled open dialogue on forced labour across various levels of society and empowered and legitimized populations in vulnerable situations to seek help.

**Adopting and enforcing policies to promote fair recruitment including through regulation of labour intermediaries.** Governments can support companies to meet their responsibilities to their workers with clear, common standards. Discussions are easier when guidance is rooted in law and are expected by and of all players in the market.

The Government of India has developed a system to encourage recruiters to fulfil their responsibilities to carry out due diligence and that blacklists agencies and companies that violate workers' rights. See [ILO Promising Practice for fair recruitment: India – Blacklisting employers and recruiters abroad to protect Indian migrant workers](#).

**Awareness-raising at all levels of implementation**, including all levels of government, the labour inspectorate, journalists and vulnerable populations. For example, the national awareness-raising campaign targeting citizens of Uzbekistan reached more than a million people for two consecutive years. Awareness-raising campaigns were integrated within mainstream education curricula, and journalists were trained on effective reporting on forced labour, resulting in a broader awareness of workers' rights and a wide-spread confidence among key stakeholders to speak more openly about issues and report issues through available hotlines. In Malaysia, awareness-raising through Project Liber8 targets schools, universities and online platforms to address discriminatory attitudes towards migrant workers in Malaysian society.



© ILO

**Capacity-building of the labour inspectorate**, including through partnership with technical experts. For example, collaboration between the Ministry of Labour and Better Work Jordan in 2018 supported inspectors to better understand assessment guidelines on a range of topics, including forced labour, preparation, gaining entry to a site, site tours, worker interviews, management interviews, report checks, pre-closing, closing and reporting.<sup>10</sup> More broadly, capacity-building of local actors, including EBMOs, workers organization and civil society is important to support long-term ownership of initiatives.

**Joint labour inspections** between the Government, employer and business membership organizations (EBMOs) and workers organizations were identified as an effective way to increase the credibility of the inspection system and build trust and dialogue between key actors. For example, in Malaysia, joint labour inspections by the Ministry of Labour, Malaysian Employers Federation and workers organizations following the implementation of the Workers' Minimum Standards of Housing and Amenities (Amendment) Act 2019 (Act 446) led to improved engagement with suppliers, because they felt that their interests were recognized during the inspections.

**Identifying and removing imbalanced power structures** which incentivize corruption and forced labour conditions. For example, in Uzbekistan the quota system was abolished (the system had incentivized excessive working hours and other exploitative practices), the social benefits system was centralized, and more broadly, the economy was diversified and provided alternatives to working in cotton fields.

---

10 Better Work, "[Better Work Jordan trains labour inspectors on Compliance Tools and Assessment](#)", 21 May 2018.

## ► Success factors at the company level

At the company level, the following were identified as key success factors, contributing to significant ground gained towards eradicating forced labour.

**Strong governance and commitment to address forced labour at senior level.** Across a range of companies, including SMEs, senior level commitment to address forced labour and uphold workers' rights throughout their organizations was a key success factor. Where senior-level buy-in exists, staff are more motivated to implement actions.

**Capacity-building of all implementing staff within the company.** Staff who implement day-to-day business activities related to procurement, recruitment and employment must understand the actions they must take and why it is important – without this, improvement measures will be temporary or poorly implemented.

Increased awareness of company staff can be achieved through tailored, interactive, internal human rights training programmes. Training meetings should draw attention to ways staff roles and responsibilities contribute to eradicating forced labour. Enterprises that lack the capacity to develop tailored programmes can take inspiration from existing materials, starting for example with the ILO GBNFL [webinar on the ILO indicators of forced labour](#) or the [Nestle 30-minute Human Rights and Business E-learning training](#) or [AB InBev Supply Chain Ethics Training](#).

Further, where understanding is low, the investment of time, energy, communication and third-party technical support helps to build understanding over time, and typically within 12 months staff are able to identify required actions on their own.

In raising awareness across the enterprise, it is important to engage all relevant departments, including human resources, recruitment, commercial and production teams, rather than sustainability departments only.

**Access to ongoing technical guidance** on how to prevent and remediate forced labour risks, especially for companies where understanding of issues is low. Companies that participated in the study, including SMEs, all agreed that businesses need awareness-raising and information to tackle forced labour in their operations and supply chains. For example, the Malaysian Employers Federation sensitized and engaged employers, including SMEs on changing requirements for addressing forced labour risks.

**Presence on the ground.** A holistic programme to address forced labour often requires a significant amount of time and requires staff on the ground to work closely with suppliers and other stakeholders to increase understanding, both culturally and linguistically, of expectations and how these can be implemented. Further, companies can use local auditors with a comprehensive understanding of the indicators of forced labour within the local context and knowledge of what to look out for.

**Leverage.** A collective group of buyers can have a greater impact than a single buying company in generating leverage over supplier practices. Intermediaries (e.g. buying agents) should be included in the group of buyers as they often have a more direct relationship with the supplier.

**Support from EBMOs to their members,** which play a particularly important role in making sure that SMEs remain up to date with changing regulations and have access to resources and information on how to address issues where identified. Further, international support to nation States with regards to building social protection measures, increasing labour inspection capacity, promoting social dialogue and broader efforts at formalization will support the overall effectiveness of initiatives.

**Participation in multi-stakeholder initiatives focused on forced labour.** A wide range of multi-stakeholder initiatives have emerged globally with the aim of eradicating forced labour and/or other human and labour rights-related abuses including recruitment related exploitation.

While there is limited measurable evidence of the impact of multi-stakeholder initiatives, anecdotal evidence from a wide range of stakeholders across Government and business actors suggests that platforms for coordinating, collaborating and exchanging information and resources helps to create an environment where a larger range of actors are taking unified actions to address forced labour.

The ILO Global Business Network on Forced Labour, Consumer Goods Forum and Responsible Business Alliance are examples of such platforms. Anecdotal evidence from Malaysia indicates that suppliers (including SMEs) had greater awareness of requirements and how to implement them as a result of participation in programmes of the Responsible Business Alliance.

**Use of technology and mechanization to increase transparency of operations.** This was identified as a success factor across various cases, for example wage payment systems (see examples from Qatar and the United Arab Emirates).

**Publishing remediation efforts.** Impactt found a number of companies in Malaysia searching for public statements from their peers on remediation efforts, for guidance on which approach to take. Publication of details therefore supports industry transparency around remediation and, in some cases, increases likelihood that remediation will be carried out.

## ► Success factors across all levels

**Allocation of funding.** Capacity and resource constraints are a universal challenge for Governments, enterprises and their partners. The allocation of funding for particular activities designed to identify, prevent and remediate forced labour is a critical first step towards the development of meaningful interventions. Given resource constraints, especially at the SME level, this may require creative mobilization of resources, including through collaborative efforts. Evidence shows that multi-year funding helps to support sustainability of programmes.

**Taking a holistic approach.** At all levels, programmes focused on effective identification, prevention and remediation were more effective at creating sustainable and systemic change when they took a holistic view and had monitoring and evaluation mechanisms to provide evidence of progress. For example, technical programmes between the ILO and the Government of Qatar took a holistic approach across all levels and stakeholder groups.

**Increasing workers' level of knowledge and awareness of their rights.** Awareness-raising campaigns resulted in reduced cases of exploitation. Through campaigns that reached people in situations of vulnerability, and through pre-departure and post-arrival orientation programmes, workers were less likely to face deception, and better informed about grievance mechanisms, thereby leading to better overall visibility of issues and the ability to address them.

Migrant Resource Centres (MRCs) are key spaces through which workers can access information and support, including legal assistance. At the end of 2020, MRCs had served 178,485 clients (44 per cent women) and a total of US\$10,774,850 was awarded to workers as remediation for the harm and suffering they experienced.

**Worker access to effective social dialogue mechanisms.** As a key precondition, workers' ability to organize and exercise their collective voice needs to be guaranteed for social dialogue to be effective. The process of social dialogue can empower workers through organizing, thereby reducing their vulnerability. Mechanisms can enable workers, workers' organizations and employers to discuss and reach practical agreements on issues such as restrictions on movement in response to safety or health concerns.

Worker access to effective grievance mechanisms. Where helplines or other mechanisms that were provided nationally, by civil society organizations or independent third parties, and were known and trusted by workers, workers were able to seek assistance and participate in remediation processes. Inputs from workers into remediation processes were found to be particularly useful, as approaches could be adjusted on an ongoing basis to suit the needs of workers and the working environment (which workers often know better than most), resulting in better and more sustainable outcomes overall.

#### **Targeted collaboration and coordination:**

- ▶ **Between government actors.** Successful management of cases depends on coordination between Governments and embassies. For example, there is close cooperation and constant dialogue between the Government of Malaysia and embassies (with the involvement of designated labour attaches).
- ▶ **Between stakeholders.** Targeted collaboration and coordination between government departments and other stakeholders is key. For example, in Colombia and Peru, a joint task force on forced labour included representatives of the police, the court and labour inspectors, to support more effective overall identification and addressal of issues.
- ▶ **Between buyers, suppliers and other supply chain actors.** The combination of leverage, consistent pressure and shared accountability in targeted collaborations (typically focused on one or several enterprises) helped to drive the momentum of interventions. Shared funding of activities, such as deep-dive assessments and capacity-building programmes for suppliers, increases the likelihood of buy-in from multiple actors.
- ▶ **Between social partners and the business community.** For example, in Qatar, the International Organisation of Employers (IOE) and Human Rights Watch facilitated dialogue sessions. This was key to building awareness and buy-in, especially among SMEs or businesses that were struggling to adapt their business model to new requirements.

**Engaging with technical experts** on the design and implementation of investigation, prevention and remediation interventions, including national action plans to eradicate forced labour. Enterprises and Governments often do not have relevant capacity or resources. Engagement with technical experts supports capacity-building of Governments and enterprises, contributing to local ownership of solutions in the long term. For example, in Malaysia, the technical partnership between the Government and international and national experts, including the ILO and national actors, led to the development of the National Action Plan on forced labour, with all stakeholders reporting significant learning through this process.

**Continued and focused attention on forced labour** from a variety of stakeholders (including the media), as well as targeted engagement with Governments and enterprises helped to sustain action over time.

It is only when a practice is widely considered to be unacceptable that real change at scale becomes possible. It is therefore critical to shift social perceptions and attitudes around acceptable standard working practices. The media, civil society, academic institutions, individual champions (such as legislators and activists), and artists have roles in keeping the eradication of forced labour on the agenda for politicians, investors and the general public, and normalizing good working practices. For example, media has played a key role in shifting attitudes and increasing awareness in industries with high levels of forced labour, such as fishing in Thailand, glove-manufacturing in Malaysia and cotton production in Uzbekistan. Specific States have taken steps against forced labour in some sectors, requiring enterprises to take action and having knock-on effects on these industries more broadly.

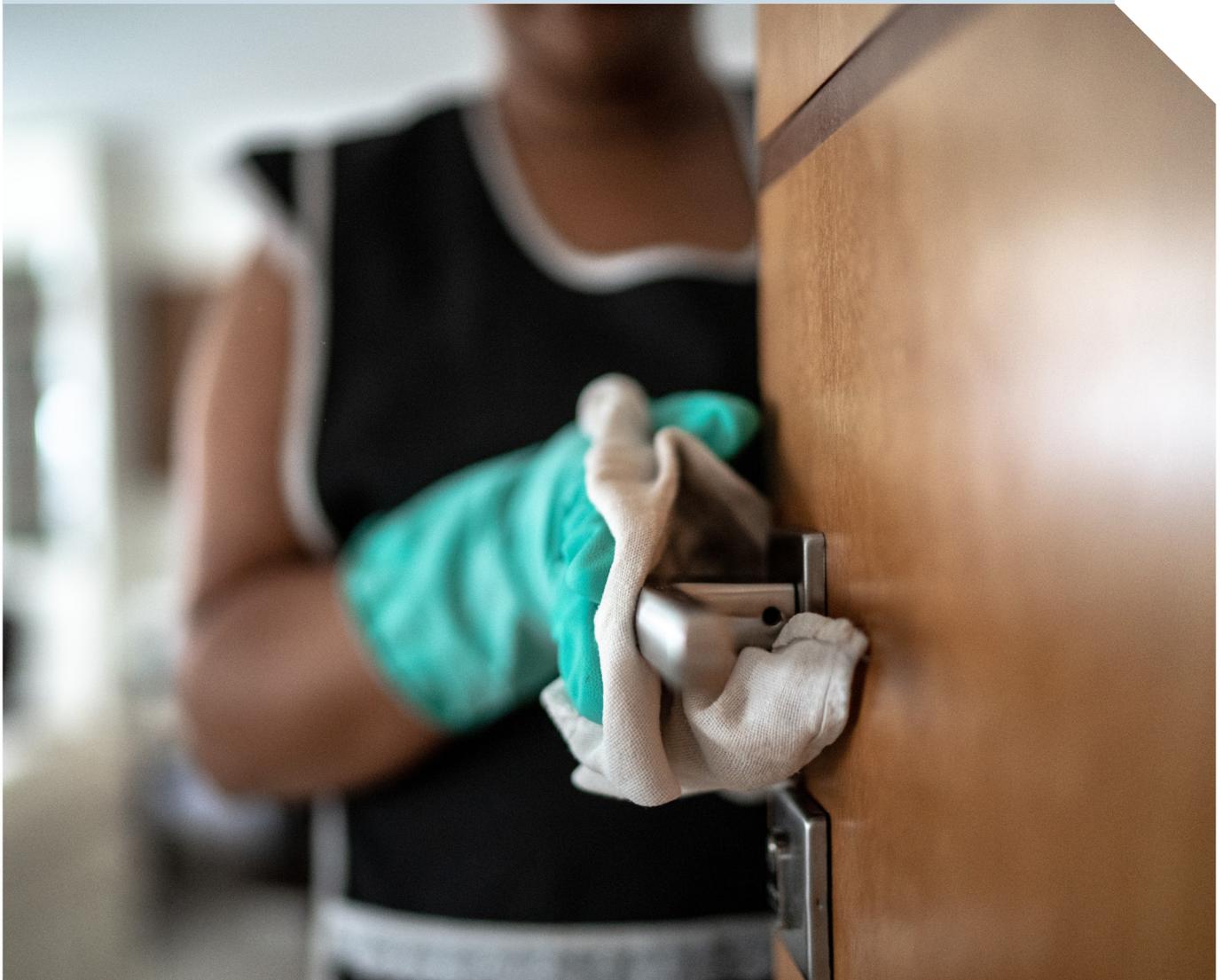
While international efforts are important, **sustained pressure and ownership at the national and local level** often results in reporting that is more focused, more influential with local constituents and provides a more nuanced understanding of issues.

**Open, honest and constructive dialogue between stakeholders – building trust.** Trust among stakeholders is key for any approach to be effective in the long term. In many cases, trust needs to be earned among government stakeholders, the business community and workers. Pilot interventions are an effective way of building trust in a new process. Key aspects of trust-building include open and constructive dialogue and a non-hierarchical approach (i.e. no imposition of top-down mandates). Honest recognition of the realities on the ground and the role of each stakeholder is also important. For example, a buyer and a supplier had a contract which did not adequately cover costs of fair recruitment for the project, and they renegotiated it to include adequate funding for fair recruitment.

**Geographical reach.** Programmes designed for regional reach support the long-term goal of impact at scale. For example, the Better Migration Management programme aims to improve migration management in the Horn of Africa, and in particular to address the trafficking and smuggling of migrants. Participating countries include Kenya, Ethiopia, Somalia, Uganda and others. Since its inception in 2015, the programme has strengthened protections against violence and the abuse and exploitation of migrants.

**Presence of strong civil society at grassroots level** is key to maintain pressure, accountability and local ownership of issues and ultimately supporting the sustainability of changes.

© ILO GBNFL/FG Trade



## 5. Learning across contexts

---

In theory, approaches that work in one country or business context should also work in similar contexts. Although it is difficult to draw direct causal linkages between approaches in specific contexts and successes (given the vast range of factors that could potentially play a role), the following lessons have been drawn from the study. While a focused and in-depth analysis of opportunities for scaling and replication would need to be carried out on a case-by-case basis for each country context, the following lessons may provide a useful starting point.

### ► Tailoring approaches to country contexts

At the country level, the need for different approaches is primarily based on key differences as described below.

**The political landscape.** Factors in the political landscape include meaningful commitments from the Government to a strategic action plan on eradicating forced labour, and the capacity, resources and political will of relevant central and district-based government departments to make required changes across the country.

**Local contexts and culture.** Communication approaches need to be adapted to the cultural context of the country to open doors especially among the business community. To change cultural dynamics or entrenched attitudes (such as gender-based discrimination) and economic drivers of forced labour practices may require softer and wider scale interventions. Given the sensitivity of cultural attitudes and beliefs, it will take time to achieve systemic progress. Progress towards systemic change can happen alongside efforts to address underlying business pressure and/or weakness in governance and accountability mechanisms.

**Strategic methods** for engaging in a collaborative approach should take into account the often complex and sometimes fraught relationships between relevant national and international stakeholders. In countries with high levels of migrant labour, such as Malaysia and Qatar, it is important for Governments and enterprises to carry out cross-border engagement on the regulation and monitoring of recruitment corridors. Governments have a key role to play, but enterprises can also have a significant impact by carrying out comprehensive due diligence around fair recruitment throughout their operations and supply chains, and ensuring that workers do not pay any fees or related costs for their recruitment.

Some countries may need to take a softer approach in the initial stages of engagement to eradicate forced labour, and it will take them longer to make progress.

## ► Tailoring approaches to business contexts

Business context plays an important role, as do sector, size and leverage. The challenges facing SMEs to implement the approaches outlined is greater, and, as a result, relying more on support from international and national buyers, business associations and participation in multi-stakeholder approaches to benefit from shared learning. Key lessons in that regard are provided below.

**MNEs vs SMEs.** While MNEs are increasingly well versed in the language around forced labour prevention and remediation, many SMEs do not have dedicated personnel, relevant technical knowledge or even basic understanding of the issues. An effective approach must be based on knowledge-sharing between actors, including stakeholders that lack awareness.

**Cashflow.** Financing is critical for enterprises to implement effective forced labour mitigation and remediation strategies, including systemic initiatives and one-off activities such as the repayment of recruitment fees and costs. Many SMEs lack the resources to fund this work, and this gap can be filled with support from a range of actors including Governments, business associations, buyers and multi-stakeholder initiatives who can deliver, fund or support awareness-raising and capacity-building activities across industries. In Malaysia and Qatar it was essential to enable impact among SMEs. In the case of repayment of recruitment fees and related costs, insurance funds or temporary loans from buyers or financial institutions can also enable swifter remedy.

**Labour migration.** Businesses that recruit workers across borders often struggle to achieve comprehensive visibility of the recruitment practices of business partners. Increased levels of due diligence in the recruitment process will be needed in such cases, with greater attention to capacity-building of suppliers and labour recruiters to prevent exploitative recruitment practices.

**Sectors.** The sector or specific type of work can necessitate a different approach to eradicating forced labour. It is important to identify nuanced solutions that are appropriate for the context. For example, the repayment of recruitment fees to agricultural workers who do not have bank accounts will require a different process than an industrial context with high levels of traceability.

# Conclusion

---

The evidence presented in the present report is suggestive of a wide range of approaches towards eradicating forced labour, at both the government and the company level. These approaches have been implemented in a range of contexts, including contexts characterized by inadequate and poorly enforced national labour laws, poverty and structural inequality.

As highlighted in section 5, the identified approaches can be tested across country contexts, tailoring the approach according to the relevant political, cultural and business operating environment.

Almost all interventions cited in the report target the formal economy and export-oriented markets, leaving a vast number of workers outside the scope of relevant protection and remediation efforts. It is therefore critical for Governments, business associations and other stakeholders to strengthen formalization efforts, and to require domestic facing companies to implement the same or similar approaches as those taken by exporting companies while supporting them to meet those requirements.

Finally, and most importantly, it is critical to increase the capacity of local (national and regional) governments and actors, and for them to set the agenda and have ownership of it to eradicate forced labour within their countries.

Within the international community, it is important for Governments and private sector actors that already have some experience with eradicating forced labour to share knowledge with others, and to encourage and increase the disclosure of anonymized data across all actors, to enable better understanding of the impacts and causal linkages between actions taken as part of emerging initiatives. Further research should be carried out to assess the progress of ongoing initiatives highlighted in the study, to deepen the understanding of their impacts, the contextual and success factors that supported achievements and their potential for replication globally.

# Appendix A:

## Definition of forced labour

---

According to the ILO [Forced Labour Convention, 1930 \(No. 29\)](#), forced or compulsory labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.<sup>11</sup> The Forced Labour Protocol (Article 1(3)) explicitly reaffirms the definition provided in the Forced Labour Convention.

The definition of forced labour consists of three elements:

1. Work or service refers to all types of work occurring in any activity, industry or sector including in the informal economy.
2. Menace of any penalty refers to a wide range of penalties used to compel someone to work.
3. Involuntariness: The term “offered voluntarily” refers to the free and informed consent of a worker to take a job and his or her freedom to leave at any time. This is not the case for example when an employer or recruiter makes false promises so that a worker takes a job he or she would not otherwise have accepted.

---

<sup>11</sup> ILO, [“What is forced labour, modern slavery and human trafficking”](#).

# Appendix B:

## Further reading

---

### Practical resources and tools

- ▶ [Combating forced labour: A handbook for employers and business](#)
- ▶ [Strengthening Employers' Activities against Forced Labour](#)
- ▶ [UN.GIFT Guide - Human Trafficking and Business: Good practices to prevent and combat human trafficking](#)
- ▶ [ITUC Guide - How to Combat Forced Labour and Trafficking](#)
- ▶ [ILO: General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs](#)
- ▶ [Impactt: Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs](#)

### Training materials

- ▶ [ILO Global Business Network on Forced Labour Webinar – ILO 11 indicators of forced labour \(32 minute video\)](#)

### Normative sources

- ▶ [Forced Labour Convention \(No. 29\), 1930](#)
- ▶ [Protocol of 2014 to the Forced Labour Convention, 1930](#)
- ▶ [Forced Labour \(Supplementary Measures\) Recommendation \(No. 203\), 2014](#)
- ▶ [Abolition of Forced Labour Convention \(No. 105\), 1957](#)
- ▶ [ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy \(MNE Declaration\) – 5th Edition \(March 2017\)](#)
- ▶ [ILO Declaration on Fundamental Principles and Rights at Work, 1998](#)
- ▶ Evidence resource banks
- ▶ [Studies noted in the Delta 8.7 Markets Policy Guide](#)
- ▶ [Business & Human Rights Resource Centre](#)
- ▶ [Institute for Human Rights and Business](#)
- ▶ [Human Rights and Business Dilemmas Forum](#)
- ▶ [ILO: Promising Practices for Fair Recruitment](#)
- ▶ Walk Free: [Promising Practices Database](#)



International  
Labour  
Organization

GLOBAL BUSINESS  
NETWORK ON  
FORCED LABOUR

**ILO Global Business Network on Forced Labour**

Route des Morillons 4

CH-1211 Geneva 22

Switzerland

**Email:** [fl-businessnetwork@ilo.org](mailto:fl-businessnetwork@ilo.org)

**Website:** <https://flbusiness.network>

