



Ethical
Trading
Initiative



Grievance mechanisms in agriculture

A pilot ETI initiative to increase access to grievance mechanisms for vulnerable workers within targeted agriculture supply chains and facilitate the sharing of information on emerging risks to migrant workers. This pilot will focus on agriculture in Spain and Italy, and support key local stakeholders in selected pre-departure countries to share information on access to remedy, recruitment practices and other emerging risks through the creation of a modern slavery prevention network.

ETI's mission is to advocate for the most vulnerable workers, by harnessing the power of a diverse and growing membership. Through collaboration and innovation, we work to drive engagement, challenge barriers to change and ensure respect for human rights at work. Our strategy is built around supporting our members to do better for workers, while facilitating a united, multi-stakeholder approach to drive resilience and sustainability throughout supply chains.

In line with our mission and with funding from the UK Government, ETI established a project in January 2023 together with a group of our trade union, NGO and company members to increase access to functional grievance mechanisms for vulnerable workers within targeted agriculture supply chains in Italy and Spain. Vulnerable workers, attracted to low skill jobs in agricultural supply chains

around the Mediterranean, are at risk of exploitation through illicit recruitment and employment tactics. Although companies and governments have responsibilities under the UN [Guiding Principles \(UNGPs\)](#) to respect human rights and remediate harms done, there are currently no agreed best mechanisms to do so.

The grant received from the UK Government stipulates a number of deliverables to be achieved by 31 March 2025;

- The completion of a pilot initiative on labour-rights grievance mechanisms in three to four sites in Italy and Spain respectively. Consistent with our mission to advocate for the most vulnerable workers by facilitating a united, multi-stakeholder approach, the design of the grievance mechanism pilot will be based on a bottom-up approach where workers needs, and context are listened to inform the initiative while also keeping the opinions of employers in mind.
- The elaboration of lessons learned to inform other grievance mechanisms initiatives where applicable and appropriate, based on learning generated through preliminary research and the evaluation of the pilot intervention.
- Concurrent to the pilot, the project will support and / or establish a modern slavery prevention network to increase local organisations' capacity to communicate access to remedy, ethical recruitment practices, and emerging risks to migrant workers in three selected pre-departure countries in West and North Africa.

Project work group

Our experience so far has indicated that individual action by companies often leaves out smaller players where risks are higher due to capacity constraints. In line with ETI's strategy, which aims to leverage our membership to convene on systemic workers' rights issues and act collectively to resolve them, the project has formed a work group consisting of **20** members drawn from retailers, suppliers, and NGOs. The work group provides oversight, support, and expert advice to the initiative and facilitates access to growers and suppliers as well as other key stakeholders and networks.

Researching risks and communication strategies among vulnerable workers

The risks facing migrant workers in the agriculture sector in both Italy and Spain have been well researched by various stakeholders. Therefore, the work group commissioned a rapid desk-based mapping of existing secondary information as part of the inception phase. This was completed in April 2023. The assessment paid particular attention to key vulnerabilities of workers, the operational context (legal, political and social) and indicators of exploitation and forced labour. From these variables, the assessment put forward several geographical areas deemed of particular risk for labour abuse and as such, regions of interest for the project moving forward. Taking these recommendations into consideration, the work group narrowed the project's geographical focus to Puglia, Emilia Romagna, and Sicily in Italy, and Almeria, Murcia, and Huelva in Spain.

Although generally a lot is known on how people end up in exploitative and forced labour, a case-by-case root cause analysis is necessary to ensure that the proposed solution in any particular geography and supply chain addresses the salient risks, and that the grievance mechanism is likely to succeed. This also includes

understanding the current availability, type, and usage of existing formal and informal grievance mechanisms among migrant workers and recognising the types of contracts and recruitment channels used on grower sites and their relation to access to grievance mechanisms. It is also crucial to have a good picture of which formal and informal communication channels and sources of information are trusted among migrant workers of different demographics. With an understanding of accessibility and usage these may well be suitable to connect and use as part of a transparent and trustworthy reporting tool. During summer 2023, the project will conduct a deep dive into the work group's selected fresh produce supply chains in Italy and Spain through key informant interviews and focus group discussions with relevant stakeholders. These will include workers from the migrant communities working within the applicable fresh produce production in the regions chosen as well as their employers, nearby local civil society organisations and trade unions.



Piloting operational grievance mechanisms in selected sites

Based on the initial feedback and recommendations from migrant workers, and research on existing mechanisms, the project will design a grievance mechanism to be reviewed by key Spanish and Italian stakeholders and approved by the work group. Site level data at selected pilot sites will be obtained to measure progress and learning as we move forward. The mechanism will then be piloted among migrant workers' communities in the target areas for at least a year involving activities such as development training on good communication, decent work, and the operational grievance mechanisms system itself. Ongoing support will also be provided to the local businesses and migrant worker communities to facilitate implementation of the mechanisms.



Pre-departure modern slavery prevention networks

To help prevent risks of modern slavery before migrants arrive in Europe, and make sure they have access to their rights once they do, the project will be engaging in the development and / or strengthening of networks connecting North and West African civil society organisations with each other as well as with organisations and companies in Spain and Italy. As a first step relevant organisations will be identified after which the project will facilitate convening the actors, creating a space where approaches and solutions to better safeguard to-be migrant workers can be created.



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The Ethical Trading Initiative (ETI) is an alliance of trade unions, NGOs and businesses, improving human rights in global supply chains

Our vision is of a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse.

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