

Addressing Worker Vulnerability in Agricultural and Food Supply Chains: Annexes

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Annex 1: Identifying risks of modern slavery

This tool sets out a process for both assessing risk of modern slavery in supply chains and for prioritising areas to focus using a step by step scoring methodology. Users of this tool can adapt the template to suit their particular business needs in addressing risks to vulnerable workers.

This tool has been taken from [Stronger Together's toolkit](#) on addressing modern slavery in global supply chains.

Section	Step No	Steps	Activities	Considerations
Prioritisation	1	Identify Data Sources	<p>List all of your suppliers</p> <p>Collect information on your annual spend from each supplier</p> <p>Create a report that shows the location of all your suppliers and your spend with each of them, included forecast spend for the following twelve months</p> <p>Within the report, create categories for your suppliers, for example high, medium and low spend</p>	<p>Have you included all your direct and indirect suppliers?</p> <p>Have you included labour providers?</p> <p>Have you included subcontractors?</p> <p>Are there any gaps in your information</p> <p>What information do you need to accurately forecast spend from suppliers?</p>
	2	Categorise Spend	<p>List suppliers by total spend</p> <p>Categorise into spend areas based on goods/services being purchased</p>	<p>Determine what is considered high spend for your organisation</p>
	3	Internal engagement	<p>Identify contract owners</p> <p>Educate stakeholders on the reason for risk profiling</p> <p>Gain understanding of any potential future</p>	<p>Ensure you have not missed any areas of spend. Budget owners will be able to identify gaps.</p> <p>What will be the challenges</p>

		<p>changes in spend with suppliers</p> <p>Identify suppliers that provide goods and services from high risk sources</p>	<p>for your business of working with high risk suppliers? For example, do you have a formal supplier management programme in place?</p> <p>Are any other teams in your business conducting or have they ever conducted risk profiling on suppliers that you need to take into account?</p>	
Assess Risk (complete this process for either category or by supplier)	4	<p>Assess supply chain risk</p>	<p>Populate the report you have created to show supply chain risk using Steps 5 and 6 below.</p> <p>Identify any missing information.</p> <p>Apply a 1-5 score based on where the risk is greatest in the supply chain (5 being the highest).</p>	<p>Does your business have visibility of your supplier's first and second tier supply base?</p> <p>What information do you need from internal and external stakeholders to close any gaps identified in this step?</p>
	5	<p>Assess country and industry risk factors</p>	<p>Allocate a 1-5 score where:</p> <p>Supply chains in countries where labour rights are not protected score higher than others.</p> <p>High risk industries previously affected by undeclared labour, illegal labour and human trafficking score higher than others.</p> <p>Supply chains that include foreign employees not under collective agreement score higher than others.</p> <p>Unskilled, temporary and/or seasonal labour scores higher than others.</p> <p>Foreign workers/temporary staff employed under temporary contracts who are engaged by foreign or local temporary staffing agencies score higher than others.</p> <p>Subcontractors, temporary staffing agencies and short-term seasonal contract score higher than others.</p> <p>Job functions outsourced and carried out by foreign workers/ temporary staff who are not immediately visible or noticeable because the work is carried out at night, or in a remote place score higher than others.</p>	<p>What reliable sources exist on country/sector/supplier risk?</p> <p>What gaps are there in the information your business needs?</p> <p>What information can you collect to close any gaps?</p> <p>Are there key stakeholders who can help you do this, for example, trade unions?</p>
	6	<p>Assess supplier capacity</p>	<p>Does the supplier have a code of conduct that addresses slavery?</p> <p>Does the supplier have sourcing policies that address slavery?</p> <p>Do they have demonstrable management processes in place to manage the risk of slavery in their supply chain?</p> <p>Have they been identified through third party audits, in the media, or through businesses that monitor risk as having instances of</p>	<p>Ensure you assess the supplier information either via their websites or through the Supplier Self-Assessment Questionnaire (Appendix 8)</p> <p>Where you cannot find answers to these points score the supplier more highly as these can be addressed in the remediation plan.</p>

		<p>slavery?</p> <p>If so, what remediation took place?</p> <p>Has the supplier signed the company agreement on forced labour?</p> <p>Review supplier's internal management process e.g. do the contracts have appropriate clauses addressing the prevention of slavery, does the supplier have any reporting requirements on high risk areas?</p> <p>Review the supplier's requirements of their suppliers and labour providers – how do they manage the risks of forced labour down their supply chains?</p> <p>Has the supplier completed training on anti-slavery practices?</p> <p>Apply a score 1-5 (with five as the highest score for those that have no policies, process and have been identified as having breaches).</p>	<p>Ensure that all considerations are recorded as these will feed into a remediation plan.</p>
	7	<p>Assign overall score</p> <p>Add the total scores for each supplier and/or category.</p> <p>List by highest score to complete highest priority list.</p> <p>Categorise all suppliers as high, medium or low risk.</p>	<p>Are there any changes in your business strategy that you should take into account based on your risk analysis?</p>
Action planning	8	<p>Implement remedial actions</p> <p>List by supplier and/or type of supplier the total risk score for each supplier and an analysis of improvements required.</p> <p>Engage internal stakeholders to communicate findings.</p> <p>Identify where you need more information to understand the human rights risks posed by your supply chain.</p> <p>Determine how you will work with your suppliers to gather that information.</p> <p>Work with suppliers to address risks and gaps in capacity.</p>	<p>What tools do you want to use to gather further information on your supply chain? For example, ethical audits or human rights risk assessments?</p>
	9	<p>Understand your influence</p> <p>Work with stakeholders to answer the following:</p> <p>Do you have enough leverage with high and medium risk suppliers to invoke change?</p> <p>Whom could you collaborate with to get more leverage?</p> <p>Are your suppliers willing to be supported to improve policy and practice?</p> <p>Will your supply chain be willing to provide more information on the human rights impact of their business? If not, will you continue to work with them?</p> <p>Does your business represent >0.5% of supplier's turnover?</p>	<p>With whom could you collaborate to gain more leverage?</p> <p>What relationships do you have with government in the relevant country, and how could they support you to tackle the risks identified?</p>

Annex 2: Assessing worker vulnerability

This tool provides a list of questions that workers can be asked to assess their vulnerability. It can be amended to suit your business's requirements and particular worker vulnerabilities according to certain supply chains or identified risks.

This checklist has been adapted from a [Stronger Together's toolkit](#).

Recruitment	How well do you speak the local language? What agencies/employers do you work for? How did you find out about the work? Were you promised a job? How was the job described to you? Was the job how it turned out to be – e.g. pay rate, number of hours? Did you have to pay a fee for the job? What have you paid to get this job? Did you have to pay any money for other services such as translation or travel? How did you travel from another country or region? Who arranged and paid for the travel? How much did the journey cost? Who met you? Where were you taken? Where is your ID? Is your ID usually held by someone else? Who?
Pay	Do you owe anyone any money? (If the answer is yes then ask who and how much and what they have to pay back and how) Does anyone owe you any money? How much were you paid last week? How many hours had you worked? Was the pay correct? Do you receive a payslip? What deductions are made from your wages Have you been withheld pay for work you have performed? Have you had any money unfairly deducted from your wages? Are you free to open and be paid into the bank account of your choice? How many bank accounts have you opened? What are the names of the banks? Have you got the bankcard and PIN number? (if the answer is no, ask where they are) When you opened that bank account, who went with you? Who told you to go to this bank (or these banks)? Examine the bankcard if in possession (Is the PIN number written on the rear - if it is, this may be an indication of forced labour so ask the question, "What is this number on

the rear of the card?"

Treatment at work

Does anyone else use your bank account?

Since you have been working here, how have you been treated?

What do you like about working for your employer or recruitment agency?

What do you not like about working for your employer or recruitment agency?

Have you been subject to verbal or physical abuse by anyone in labour provider/labour user? By this we mean things like being shouted or sworn at, being pushed, kicked or having things thrown at you?

What hours do you normally work?

How are the hours allocated amongst workers?

Are you happy with the hours that you are asked to work?

If you didn't want to work the hours allocated what would happen?

Have you ever been forced to work long hours, overtime or on any days when you didn't want to by anyone in the labour provider/labour user?

What breaks do you take when you are working?

How many days do you have off each week?

How do you book holiday leave?

Have you taken any holiday?

Were you paid?

Have you taken any sick leave?

If you had to take sick leave would you be paid?

What training were you provided with?

Did you have to take a test after the training?

What help was given to you during the test?

What risks are there in your work?

Have you been provided with PPE (may need explaining)?

How much did this cost you?

If you lose the equipment or damage it what will happen?

Have you been prevented from joining a trade union or been penalised for doing so?

Accommodation and food

What address did you provide to the agency?

How did you find your accommodation?

Who is the landlord?

How much rent do you pay?

What happens if you can't pay the rent?

Who collects the money?

If you wanted to leave the house can you?

How many people live in the house?

How many people share your room?

Are the other people related to you?

Which family members are you here with?

Do you have a written agreement with the landlord?

If you wanted to leave the house what notice do you have to give to the landlord.

Do you rent your accommodation from anyone who works for or who is linked to your employer or recruitment agency?

If you left the house, would you lose your job?

If you left your job, would you have to leave the house?

What is the condition of the house like?

Is your accommodation safe and well maintained?

How many smoke alarms are in the house?

Does the heating work?

How many bathrooms are there?

What is the condition of the house like?

What are the rules of the house?

Are you threatened by your landlord for unpaid rent?

Are you or have you been threatened with immediate eviction?

Are you free to buy and prepare food of your choice?

Who provides your food?

If provided with food, ask: What did you eat yesterday? Is this normally what you would eat?

If purchase own food: Where do you shop for food?

Do you have enough money to buy food? (If the answer is no explore what they do for food – some may go into drop in centres)

Travel

Are you free and able to return home to your country of origin when you wish?

Have you been in contact with your friends and family since you came to the UK?

When was the last time you spoke with them?

Are you free to travel to and from work using the transport method of your choice?

How do you travel to work?

How much does this cost you?

Do you have to use this transport? (If answer's yes ask why)

Raising problems

If there was a problem at work what would you do about it?

Do you feel your complaints are dealt with properly?

Have you made any complaints about work? If yes ask: How did you feel about the way it was dealt with?

How have you been treated since making the complaint?

If you wanted to report an issue but did not want anyone to know it was you reporting how would you report it?

Annex 3: Assessing and reviewing the impact of business practices

This tool provides some questions to help businesses assess their own practices which may contribute to worker vulnerability, and to assess their suppliers' impact on and ability to address worker vulnerability. It can be amended to suit your business's requirements and to address particular worker vulnerabilities in your supply chains.

This has been adapted from the [ETI Due Diligence Framework](#).

Reviewing company's own practices	
Review sourcing strategies by asking:	<ul style="list-style-type: none"> • How is the choice of sourcing country made? Are human rights risks or risks to worker vulnerability taken into considered in addition to price, quality and logistical considerations? • How long is the supply chain? What level of visibility is there within it? • Does the company have short term or long-term business relationships with suppliers? • Is unit price the most important criteria when selecting suppliers? • Does the company have a multiple sourcing / diverse supply base policy? • Is the company aware of unforeseen costs (eg delays, overtime)?
Review the company's own purchasing practices by asking:	<ul style="list-style-type: none"> • Do buyers understand production processes? • Do buyers consider sourcing raw materials, lead times? • Do buyers consider power dynamics in price negotiation, terms of trade and payment? • Do prices factor in wages, working hours, health and safety, packaging, transport? • Do buyers consider the impact of changing orders on suppliers and workers? (eg sub-contracting, working hours)
Review relationships with suppliers by asking:	<ul style="list-style-type: none"> • Is the company's relationship with its suppliers one of mutual trust and respect? • When and why are relationships with suppliers terminated? • Is termination of relationship / orders with a supplier used as an alternative to influence if ethical trade standards are not met and why? • What is the volume of the company's orders and does it assess the suppliers' ability to meet this without having to sub-contract? • Are the price, speed, quality demands achievable to meet expectations on labour standards?

Reviewing the company's suppliers	
Assess suppliers' capacity to uphold expectations on labour rights, including:	<ul style="list-style-type: none"> • Level of understanding of worker vulnerability through labour rights and ethical trade requirements • Understanding of the buyer code of practice and relevant international human rights standards • Transparency and visibility – including further down the supply chain • Leverage with sub-contractors and lower-tier suppliers

	<ul style="list-style-type: none"> • Capacity and will for oversight of sub-contractors and lower- tier suppliers • Attitudes and practices in relation to freedom of association and collective bargaining; is there a collective bargaining procedure in place
<i>Assess suppliers' structures and systems by asking:</i>	<ul style="list-style-type: none"> • What is the quality of their financial and human resource systems? • What policies and procedures for recruitment, contracting and treatment of workers are in place? • Are grievance, complaints and remediation mechanisms in place and functioning effectively? • What forecasting / planning is done and what is the impact on workers – e.g. additional temporary / seasonal recruitment; impact on working hours, pay, terms and conditions • Does the supplier sub-contract? Does it keep records of sub-contractors and what is its justification for the use of sub-contractors? • Does the supplier have effective worker communication systems in place? Do workers understand their rights and company requirements - is this communicated in own language?
<i>Assessing suppliers' legal status and compliance with the rule of law</i>	<ul style="list-style-type: none"> • Check legal status of suppliers, media reports or other records for abuse or breaches • Check if supplier meets requirements of local labour laws and regulations and meets the standards outlined in the UNGPs and for trans-national corporations, OECD Guidelines.

Annex 4: Remedial actions

This tool provides some examples of remedial actions relating to specific issues relating to worker vulnerability. It can be amended to suit your business's requirements and to address particular worker vulnerabilities in your supply chains.

The tool has been adapted from the [Walk Free Foundation's Toolkit](#) on addressing forced labour in supply chains.

Table 1: Remediation of Recruitment Practice Issues	
Circumstances	Remedial actions
Workers abducted, confined during the recruitment process or sold.	Worker safety is priority. Work with local groups especially NGOs and trade unions to provide victims a safe place to stay and link them to needed services. Only when it is sure workers will not be criminalised for their actions while in a situation of exploitation, should law enforcement be approached.
Workers recruited through a loan or advance and are working to pay it off.	If the supplier paid the loan or advance, determine whether the terms were reasonable. If not, work out reasonable terms between supplier and worker. If the loan/advance was paid by a labour recruiter, determine whether the supplier had knowledge of the arrangement. If so, work out reasonable terms between supplier, recruiter and worker. If not, require the supplier to discontinue its relationship with the recruiter. Report unscrupulous recruiters to authorities.
Deceptive recruitment: workers promised types of work, working conditions, contract terms, housing or living conditions, job locations, employers or wages/earnings that do not materialise.	If the supplier made a false promise, the supplier should provide all employees who wish to leave their full wages due and transportation home. If the false promises were made by a labour recruiter, determine whether the supplier had knowledge of the arrangement. If so, the supplier is still responsible for the above. If not, require the supplier to discontinue its relationship with the recruiter. Report unscrupulous recruiters to authorities

Table 2: Remediation of Working and Living Conditions Issues	
Circumstances	Remedial actions
Workers working excessive overtime beyond legal limits.	Ensure that the supplier pays workers back wages for all overtime hours worked. Work with the supplier to evaluate staffing policies and compensation practices, such as piece rates, that are contributing to overtime. Examine your own sourcing practices, including lead times, changes in orders, pricing and other pressures that could necessitate extreme cost-cutting measures on the part of the supplier, including excessive overtime. Ensure that all workers receive training on their rights under the law and the social compliance system.
Workers expected to work "on call"	Work with the supplier to design a more structured staffing plan that meets your code's requirements. Ensure that all workers receive training on their rights under the law and your code of conduct.
Employer restricts workers' freedom of movement or	Determine who—management, supervisors, shift leaders, employment agencies etc. —are involved in restricting workers' freedom of movement or communication and investigate these

<p>communication</p>	<p>individuals’ actions. If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination. If these restrictions came from management, terminate the relationship with the supplier or provide the supplier a short window of time to end all such practices.</p> <p>Further investigate conditions and circumstances at the worksite that management or supervisors may be trying to conceal – including through off-site interviews with workers and other knowledgeable community members. Ensure that all workers receive training on their rights under the law and your code of conduct, including channels for grievances. Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p>
<p>Degrading living conditions</p>	<p>Ensure that the supplier fully understands your minimum standards for employee housing. Give the supplier a short window of time to remedy all living conditions. Ensure that all workers receive training on their rights under the law and your code of conduct, including housing standards. Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p> <p>Follow up with an unannounced investigation that includes off-site interviews with workers and other knowledgeable community members. If the living conditions have not improved, terminate the relationship with the supplier – while mitigating the impact of this on the workers.</p>
<p>Workers forced to engage in illicit activities, to work for private home/family or to take addictive drugs</p>	<p>Determine who—management, supervisors, shift leaders, etc. —are involved in restricting workers’ freedom of movement or communication and investigate these individuals’ actions. If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination. If these restrictions came from management, terminate the relationship with the supplier or provide the supplier a short window of time to end all such practices.</p> <p>Further investigate conditions and circumstances at the worksite that management or supervisors may be trying to conceal— including through off-site interviews with workers and other knowledgeable community members. Ensure that all workers receive training on their rights under the law and your code of conduct, including channels for grievances. Ensure that workers who wish to leave the job are able to do so and receive their full wages due</p>
<p>Supplier inflates workers’ indebtedness</p>	<p>Determine the source of workers’ initial debt. If the initial debt was to the supplier, require the supplier to cancel this debt. If the initial debt was to a labour recruiter, investigate whether the supplier had knowledge of the debt arrangement. If so, require the supplier to cancel the debt. If not, require the supplier to terminate its relationship with the recruiter. Report the recruiter to authorities.</p> <p>With respect to the inflation of the debt, require the employer to immediately stop charging any form of interest on the debt. If debt is inflated through purchases from the employer, such as at a</p>

	<p>canteen, determine whether workers have other options. If purchases at employer-owned stores are the only viable option for workers, work with the supplier to ensure that prices and terms are reasonable.</p> <p>Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p>
Workers depend on employer for housing, food or other necessities	<p>In some cases, particularly for migrant workers, provision of housing, food and other necessities by the employer may be the best option for all involved. However, the quality of the housing and foods must be examined and if it does not meet minimum standards, work with the supplier to improve quality. Follow up with an unannounced investigation that includes off-site interviews with workers and other knowledgeable community members. If the living/food conditions have not improved, terminate the relationship with the supplier.</p>
Workers have personal dependency on employer	<p>Ensure that all workers receive training on their workplace rights under the law and your code of conduct, regardless of personal relationships.</p>

Table 3: Remediation of “Impossibility of Leaving” Issues

Circumstances	Remedial actions
Workers do not feel free to resign because of benefits they have received or because employer restrictions.	<p>If a supervisor or other individual is leading workers to believe they cannot leave because the supplier has provided training or other benefits, or because of an illegal contractual requirement, require the supplier to take appropriate corrective action against this individual, from training to termination. If workers simply do not understand their rights, provide training to ensure they know when they may resign. Ensure that workers who wish to leave the job are able to do so and receive their full wages due</p>
Workers feel compelled to stay because they are due wages	<p>Ensure that wages are being computed accurately and that all employees involved in payroll are adequately trained in wage computation. Require the supplier to pay all wages due under local law (for example, if local law requires payment biweekly, require all wages to be paid, at a minimum, through two weeks ago). Ensure that payment schedules are formalised, within legal limits and the limits of your code. Follow up with an unannounced audit. Ensure that workers who wish to leave the job are able to do so and receive their full wages due.</p>
Workers work for an excessive or indefinite amount of time to repay a debt or advance from the employer or recruiter	<p>If the supplier paid the loan or advance, determine whether the terms were reasonable. If not, work out reasonable terms between supplier and worker. If the loan/advance was paid by a labor recruiter, determine whether the supplier had knowledge of the arrangement. If so, work out reasonable terms between supplier, recruiter and worker. If not, require the supplier to discontinue its relationship with the recruiter. Report unscrupulous recruiters to authorities.</p>

Table 4: Remediation of Penalty or Threat Issues

Circumstances	Remedial actions
Supplier or recruiter has possession of workers' identity or travel documents	Suppliers should never confiscate or take control of workers' identity or travel documents unless it is purely for safekeeping purposes, and then only if workers are able to retrieve their documents promptly upon request. Require the supplier to return all workers' identity documents. If workers prefer that the supplier hold them for safekeeping, ensure that a policy is in place for retrieval of documents and that all workers are aware of the policy. Follow up to check on the issue through an unannounced audit.
Employer restricts workers' communication	See above.
Employer threatens to turn workers in to immigration authorities	In any situation of violence, penalty, intimidation or threat, determine who— management, supervisors, shift leaders, etc. — are involved in these violations.
Employer perpetrates or threatens physical or sexual violence	If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination.
Employer or recruiter threatens to remove privileges like promotion potential, threatens further deterioration in working conditions or threatens to fire workers	In any situation of violence, penalty, intimidation or threat, determine who— management, supervisors, shift leaders, etc. — are involved in these violations. If individuals were acting on their own without management knowledge, take appropriate action with these individuals, which could include training, suspension or termination.
Employer or recruiter exploits religious or cultural beliefs of workers	If these penalties, threats, etc., were initiated by management or if management was complicit, terminate the relationship with the supplier or provide the supplier a short window of time to end all such practices. Ensure that all workers receive training on their rights under the law and your code of conduct, including channels for grievances.
Employer or recruiter withholds workers' pay or assets or threatens financial penalties	
Employer threatens extra work for uncooperative workers	Ensure that workers who wish to leave the job are able to do so and receive their full wages due. Follow up with unannounced audits that include offsite interviews with workers and knowledgeable community members.
Employer uses blackmail to coerce workers	

Annex 5: Grievance mechanisms

The following are points for companies to take into account to improve their operational level grievance mechanisms (GMs).

These are recommendations based on research conducted by [SOMO](#). This can be amended to suit particular issues and worker vulnerabilities in your supply chains.

Accessibility

Grievance Mechanisms (GMs) should be accessible through more than one channel or access point such as hotlines, emails, complaint boxes, etc., and filing a complaint should be easy. Workers should also be aware that they are indeed accessing the company's official GM as opposed to an unofficial and informal channel.

GMs should be accessible to all workers, including temporary and contract workers.

Companies must ensure that workers are informed about their GMs through multiple channels such as line leaders, announcement boards, social media, meetings, pamphlets, orientations, trainings, etc.

The awareness raising that companies offer should be ongoing and should not be limited to new employee orientations when information about GMs may be easily forgotten or overshadowed by other information that may be more relevant to a new employee.

Predictability

Companies should explain every step of their GM process in detail, including the timeframe and the person(s) responsible for handling complaints by issue.

All complaints should be acknowledged as received, and workers should be given an estimated timeframe if the processing period is expected to deviate from the established timeframe.

Legitimacy

Workers should have access to transparent, well-functioning GMs that they trust will deal with their grievances in a fair and impartial manner.

Companies should build workers' trust by being 1) transparent about the complaints that have been received and resolved, 2) allowing anonymous complaints and 3) communicating that complainants will not be punished or dismissed.

Companies should involve workers, trade unions and workers' representatives in the complaint mechanism as a mean to increase the legitimacy of their GM such as establishing a committee that handles all complaints.

GMs should have an oversight body that involves workers, trade unions and workers' representatives that handles appeals and conducts regular performance assessments. As the UN Guiding Principles recommend, "The stakeholder groups for whose use it is intended should be consulted on its design and performance".

Ideally, companies should provide access to an independent third-party complaint mechanism (not simply a third-party hotline operator), which also involves workers, trade unions and workers' representatives.

Companies should view their GMs as an important channel that deals with problems before they escalate, rather than as a measure of last resort.

Complaints

All complaints should be handled and outcomes should be reported directly to the complainant and the entire workforce in a way that protects workers' confidentiality, if appropriate.

If a complaint cannot be resolved to a workers' satisfaction, the reason why should be explained, and workers should have the option to appeal to an oversight body that includes the participation of workers, trade unions and workers' representatives.

Workers should have the ability to follow-up on their complaints to see how the process is going, and companies should provide progress reports if the complaint is takes a long time to resolve.

Annex 6: Stakeholder engagement

Below are considerations to make when engaging with particular stakeholder groups.

Stakeholder	Considerations
Colleagues	Emphasise the importance of gathering expert internal knowledge on risk issues from colleagues who visit growers
	Use common business language to articulate the risk issues to other departments
	Share findings of risk assessments to catalyse internal discussions
	Help connect colleagues to the issue in a more personal way through trainings etc
	Disseminate the business rationale, and where possible, link benefits to the company's wider strategic competitive and operational goals
	Explain what the future steps are
Suppliers	Be open and transparent about the purpose of your engagement at all times
	Emphasise that risk assessment or monitoring of worker vulnerability is not a compliance exercise
	Reiterate that identified issues will be addressed collaboratively
	Involve in the design of mitigation and remediating actions, and the monitoring process
	Understand the business environment in which your supplier operates, the limits of your leverage over the supplier, and their capacity to implement changes without additional support
Trade unions	Conduct background research on the country and labour market context that the union is operating in, what its structure is, and who it represents (Consider the IUF or the ETI's tripartite partners as a first step).
	Try to understand the length and nature of the union's relationship with management
	Don't have unreasonable expectations, understand that unions are often small and may be stretched to meet your requirements
	Make efforts to build trust (e.g. visit union in country, engage with them in their language, share information on labour conditions identified in audit / risk assessment)
	Don't impose your agenda upon them and listen to their perspectives
	Find a common activity to develop your relationship over and think about how you can assist unions further their own objectives
	Invite trade unions to relevant consultations and events
	If there are no unions at an enterprise, sector or national level, identify alternative mechanisms such as workers' committees, or other grievance mechanisms
	Understand that alternative mechanisms should only be temporary and that they may be detrimental to the longer term development of a trade union
Civil society	Understand that NGOs often have little capacity and resource to support a project
	Be patient and take time to develop trust
	Don't be put off by rejection and don't take criticism personally
	Establish a clear agenda and use as a sounding board to identify issues and to

	comment on solutions
	Seek common ground, and look for opportunities for mutual benefit
	Try to agree on a critical path and on timelines
Other companies	Engage with and join multi-stakeholder initiatives (MSI), such as the ETI to share learnings and issues
	Where possible, share supply chain information with engaged MSI for them to anonymise and identify common areas of interest
	Engage with competitors' ethical trade teams
	Collaborate with other sourcing companies in prioritising areas for enhanced assessment
Governments	Recognise it can be difficult to work directly with government, and find out who to speak to - but persist
	Embassies of the host country can provide useful information on networks and relevant government departments to speak to

Annex 7: Monitoring

Below are some examples of key questions that can be asked to assist companies when they are developing a monitoring plan. The questions can be amended to suit particular situations or business practices.

This has been amended from the [Danish Institute for Human Rights'](#) guidance on how to conduct human rights impact assessments.

Questions to consider when developing a monitoring plan	
Question	Description
Why are you monitoring?	This clarifies the purpose of the monitoring plan. For example, did the assessment find a potential impact that needs ongoing monitoring in order to ensure that the project is not causing an actual human rights impact? Is the monitoring being conducted to address the public's uncertainties of the business project? Is it to gather data periodically?
What will be monitored?	A monitoring plan can be set-up to measure several potential or actual impacts. For example, it may be set-up to monitor internal processes and/or staff, third party staff or external impacts related to the community. Some examples to monitor relating to community impacts may include: <ul style="list-style-type: none"> • Monitor land disputes • Monitor environmental degradation • Monitor the water quality of a nearby lake, which is also being used by the company • Monitor the increase of health cases i.e. project related or other depending of the vulnerabilities in the community
How will it be monitored?	Consider the type of study being undertaken, and the necessary data that needs to be gathered in order to successfully monitor. Will it be primarily qualitative data? Is it more complex, which may require specialised equipment and technical capacity? Or is it highly complex, where the data would need to be assessed in a laboratory, etc.?
Who will participate and what will be their level of participation?	In participatory monitoring both professionals with a high level of expertise and community members may participate in monitoring. Depending on what is being monitored, the level of complexity will determine the given participatory approach as well as the necessary capacity building that may be needed. Methods of participation may vary, they may include: <ul style="list-style-type: none"> • Collection of data • Data interpretation • Communicating results
How often will it be monitored?	The frequency and duration of monitoring should be noted. Will it be monitored weekly, monthly, quarterly, biannually, etc.? Also noting the frequency of collection of data as well as the sample size necessary to ensure an effective study.
Who is responsible for the monitoring?	This looks to the governance structure, the actual roles, procedures and organisation for the management of the monitoring plan. While the company can take the lead in monitoring, it may want to look to other options when considering issues relating to capacity, credibility, community trust and independence, such as: <ul style="list-style-type: none"> • Involving an NGO, trade union, university, or religious group • Involving a relevant government agency

	<ul style="list-style-type: none"> • Taking a multi-stakeholder approach
How will the data be used?	<p>The data collected may be used for many purposes, for example:</p> <ul style="list-style-type: none"> • Mitigating potential or actual human rights impacts affecting vulnerable workers • Ensuring compliance with regulatory requirements • Ensuring a human rights-based approach to monitoring • Creating awareness and educating stakeholders • Addressing public perceptions on the business project • Building capacity of the local community and company
How will the company respond to monitoring findings?	<p>The plan should include structured responses for different findings from the monitoring. For example, if severe human rights impacts are found these should be escalated to senior management immediately, if specific mitigation measures are found to be effective this should be recorded for future learning on continual improvement, if specific mitigation measures are found to be ineffective the monitoring plan should require this to be brought to the attention of relevant staff so that new mitigation measures can be promptly designed and implemented and so forth.</p>
How will results be presented to stakeholders?	<p>Given the public and inclusive nature of participatory monitoring any results should also be made public. This means that all data should be available and accessible to those who participated in the monitoring and other interested stakeholders; and that the monitoring design, which describes the methods, the data collecting process, the process of interpreting the data, and actual findings as well as conclusions, should be available. Communication about monitoring processes and findings should also be responsive to the local context, i.e. in relevant local languages and through modes of communication used in local communities</p>
Funding	<p>Like governance, the funding of a specific monitoring program is another important area to consider. Funding should be adequate in order to ensure effectiveness. The dilemma is that while the company is often expected to pay for the costs involved in monitoring, this funding may also bring issues of credibility, lack of independence and transparency by outside organisations. Having in place a multi-stakeholder or independent governance structure, or review panel, that is involved in administering the funding for monitoring activities may go some way to addressing this issue.</p>

Annex 8: KPIs

Below are examples of KPIs that can be used to monitor the achievement of various goals. This should serve as a general guide and can be amended by businesses to suit particular situations.

These are taken from the [ETI's toolkit on integrating ethical trade](#) into core business practices.

GOAL: Ensure a critical path does not compromise suppliers' ability to comply with ethical requirements.	GOAL: Support suppliers who demonstrate commitment to improving labour rights and working conditions.	GOAL: Ongoing commitment to integrating responsible purchasing practices and ethical trade practices into core business processes.
<p><i>Example indicators</i></p> <ul style="list-style-type: none"> • Number and cases where the critical path has been compromised • Sampling hit/conversion rate • Number of incidents of late order placement • Number of late changes to orders • Average length of lead time • Number of questionnaires for assessing the producers' experience of the company's purchasing practices distributed • Impacts measures implemented with suppliers to monitor how practices have changed 	<p><i>Example indicators</i></p> <ul style="list-style-type: none"> • % of orders placed with sites with trade unions or worker representation • % of orders placed with sites with evidence on fair and on time payment of wages • Average length of trade relationship with individual suppliers • % of suppliers who have mapped out the root causes for non-compliance and have developed corrective action plans • % of women supervisors at suppliers • % of suppliers with effective HR policies, including gender • % of suppliers who have been terminated due to lack of commitment and demonstration of improving working conditions 	<p><i>Example indicators</i></p> <ul style="list-style-type: none"> • Relevant personal development objective • Number of trainees reporting improved understanding as a result of ethical trade training • Number suppliers reporting they have implemented ethical trade tools and learning provided • Number of actions initiated to improve own practices • Number of suppliers demonstrating commitment to improving working conditions • Number of changes to labour practices implemented by suppliers • Number of observations of positive changes in working conditions during visits at production sites and reports from own visual observations