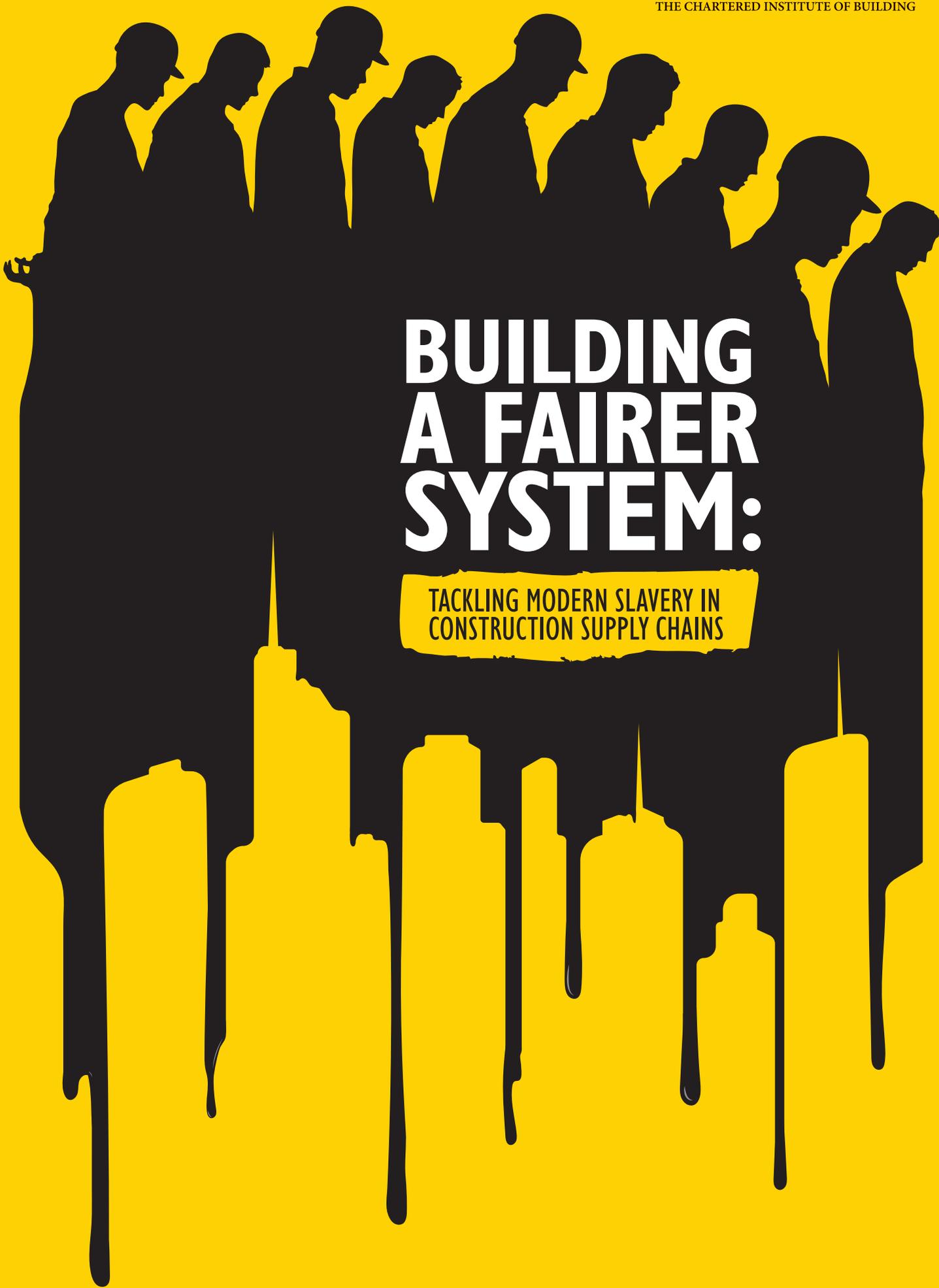




CIOB

THE CHARTERED INSTITUTE OF BUILDING



BUILDING A FAIRER SYSTEM:

TACKLING MODERN SLAVERY IN
CONSTRUCTION SUPPLY CHAINS

ABOUT THIS REPORT

Modern slavery appears in many guises: its most obvious forms include people trafficking and forced child labour. These clear cut examples contravene all international standards on human rights and are rightly condemned.

But the built environment sector harbours many other forms of exploitation. Disguised within seemingly legitimate practices and masked by labyrinthine procurement mechanisms, the exploitation stretches deep into supply chains and often remains undetected - or ignored - by tier one organisations and clients.

The workers most at risk are unskilled or low skilled labourers, travelling to regions where income is higher in the hope of dragging their families out of poverty. These labourers often enter the industry through apparently 'authorised' and 'approved' routes, yet are made vulnerable by a complex and opaque system.

Trapped by debt and living in extreme hardship, they are victims of corruption, ambiguous legislation and ineffective HR and procurement policies.

This document broadly focuses on this latter form of slavery, exploring how industry, NGOs, clients and governments can collaborate to create more ethical and sustainable supply chains for labour and materials around the world.

It has been produced in consultation with CIOB members, industry partners, human rights specialists, human resources practitioners and procurement experts.

Definitions:

Migrant workers:

Any workers that move to a new region for work. Migrant workers are often moving from a place of low income to a region where their earning potential is higher. Workers can be migrants within their own countries. In some cities, notably in China and India, migrant workers from poor rural areas do not enjoy the same rights as local citizens even though they are the same nationality.

People trafficking:

The forced movement of people either domestically or internationally in order to exploit them for work or abuse.

Bonded labour:

When someone is trapped in work due to unrealistically high levels of debt. Victims may be forced by the employer to work for free or for minimal wages to service the debt. In some cases, workers may not be able to pay off the debts in their lifetime and liability is passed to their children.

Forced labour:

Victims are forced to work against their will, often for long hours and little or no pay in dire conditions. They may be held captive and could suffer verbal abuse and threats of violence against themselves and their families.

Researched and written by Emma Crates, freelance writer and journalist
Follow Emma on Twitter: @CratesEm

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CIOB, 1 Arlington Square, Downshire Way, Bracknell, RG12 IWA, UK
Registered Charity No. (England and Wales) 280795 and (Scotland) SC041725

www.CIOB.org
policy.CIOB.org
Tel: +44 (0) 1344 630 700
Email: policy@CIOB.org.uk

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INTRODUCTION

The CIOB started a conversation about modern slavery in 2014 at our annual Members' Forum in Qatar.



Exploring the challenges that international supply chains face, we spoke with a wide range of stakeholders, signing a Memorandum of Understanding with the Qatar Foundation.

Our subsequent campaign document, *The Dark Side of Construction*, caught the attention of national media and led us into deeper discussions with members, government and industry groups.

This year our antislavery project has moved into a new phase. We are asking what we as individuals, organisations and trade bodies can do to make a lasting difference.

Slavery is present in most industries, whether through mining, raw material production, manufacturing, contracted services or agency supplied labour. Global trends towards outsourcing and complex procurement processes are pushing risk further down supply chains, making it easy for human rights abuses to remain hidden.

It is wrong to assume that abuses are confined to the developing world. Exploitation can be found in regions that pride themselves on superior human rights records, including Europe and North America, and it is surprising to see how many household names and brands risk doing untold damage to their reputation as a result of their practices.

Globally, the International Labour Organisation estimates that nearly 21 million people are victims of forced labour, generating illegal profits in the private economy of \$150 billion. Interpol estimates that only 5-10 percent of cases are ever reported.

There are no easy solutions and this report does not pretend to have all the answers, but it does explore best practice and possible remedies.

Our first step is arguably the most difficult: collectively admitting that there is a problem. The second step is to understand where the greatest risks lie within business models and to start mapping out a route forward. Ultimately, we need to achieve far greater transparency across all supply chains.

Change is coming. The UK Modern Slavery Act, the EU Non-Financial Reporting Directive, the California Transparency in Supply Chains Act, ILO conventions and UN protocols are all encouraging industries to re-examine their relationships with the poorest and most exploited workers on the planet.

Aside from the basic right of all workers to be treated with respect and dignity, the business case for ethical procurement is indisputable. Pressure from consumers, governments and investors will increase exponentially over coming years. We need to work together, not only to stamp out human rights abuses, but also to future proof reputations and brands.

CIOB's core values are founded on the principles of ethical business behaviour. We are calling on our thousands of members to ask more searching questions of their colleagues, suppliers and clients. Strong leadership is required, as is the willingness to take more responsibility, both individually and at corporate level.

Our journey towards the eradication of slavery will take decades and demands collective action, as is reflected by the multiple contributors to this report.

I would like to thank everyone who has so generously shared their time and expertise with us so far. Any interested parties not represented here are warmly invited to join the next phases. By acting together, we can speed up reform.

Chris Blythe, CIOB Chief Executive

FOREWORD

Ensuring that the supply chains of businesses operating in the UK are free from slavery is a key priority in my role as the UK's first Independent Anti-Slavery Commissioner.



As supply chains have globalised and demand for cheap products and ever cheaper labour has continued to increase, the risk of slavery in supply chains, in the UK and internationally, has become much greater. This

cannot be accepted as 'business as usual' for our contemporary society. Governments, citizens, and importantly businesses need to work to ensure that our economy is not based on a model that allows for exploitation.

We need to shift away from profit being viewed as the sole measure of success. No profit margin should be worth a human life. We must look at success through a longer-term lens of sustainable growth, and the ethical treatment of workers is central to this.

Collective action, working together within and across sectors to encourage ethical behaviours in the way that the Chartered Institute of Building is doing, is a valuable step towards changing business culture. It is exactly this kind of action and open conversation that the UK Modern Slavery Act 2015 aims to instigate in requiring large companies to report on action they are taking to ensure their UK and global supply chains are slavery free.

Conversation needs to be open, honest and transparent and the Modern Slavery Act, in its non-punitive form, hopes to encourage this. Challenges and difficulties need to be aired, not feared and hidden, because only then can we begin to find solutions.

I expect all businesses that are required to report on their anti-slavery activity under the Modern Slavery Act to do so accurately and to demonstrate a proactive approach to ensuring that slavery does not exist in their supply chain. And I will support companies who are openly working to eradicate any slave labour identified within their business.

Not only must companies seek to work within their own supply chains; they should also be leading global change. Businesses have a tremendous amount of power to influence labour regulations and to choose whom they give contracts to. The trafficking of people and the exploitation of workers is only profitable insofar as somebody is willing to buy the goods that slave labour has produced. In most cases, the immediate buyer of such goods is another company. Consequently, the behaviour of buying companies, particularly those at the top of a supply chain, can be an important determinant of standards throughout supply chains.

Ending modern slavery is now part of the Sustainable Development Goals, the set of global goals signed by all UN member states in September 2015 that will guide development policy worldwide for the next 15 years. Goal 8.7 calls for immediate action to "end modern slavery and human trafficking". Unlike their predecessor, the Millennium Development Goals, which were focused on government policy and the aid world, the Global Goals explicitly call on all businesses to apply their creativity and innovation to solving sustainable development challenges.

I therefore want to encourage businesses to take ownership of Goal 8.7 and to see the Sustainable Development Goals and Modern Slavery Act as a catalyst for innovation and new market opportunities.

With the culture of transparency becoming the norm in the era of globalised communication, having and showcasing sustainable and ethical practices really is the only way forward and indeed an excellent market opportunity. Companies who opt for a model of secrecy will find they are no longer viable, as NGOs, journalists and consumers are increasingly able to hold them to account. Instead, those who lead the way with transparent, ethical and slavery-free supply chains will become the companies of choice and the new market leaders.

Kevin Hyland OBE, UK Independent Anti-Slavery Commissioner

SLAVERY AND BONDED LABOUR: GLOBAL AND IN EVERY SECTOR

There is no denying that slavery, in the form of bonded or forced labour, is an issue in many industries. Agriculture, food production, fashion, electronics and hospitality have all received unwelcome publicity in recent years.

The collapse of the Rana Plaza in Bangladesh in 2013 that killed 1,100 people and injured a further 2,500 brought malpractices in the clothing supply chain under international scrutiny. In 2012, exposes of working conditions in electronics factories in China caused embarrassment to consumer giant Apple. And international headlines on the mistreatment of certain worker groups on the construction of the New York University Campus in Abu Dhabi was an illustration of what can go wrong even when a client is acting with the best intentions.¹

But organisations in advanced economies should not assume that the problem can only be found in poor or developing nations. Evidence of human rights abuses stretches from North America and into Europe. The tragic death of 23 cockle pickers in Morecambe Bay in the UK in 2004 is an uncomfortable reminder that exploitation can be right on our doorstep. The construction industry is not exempt from these issues.

“Many companies think of modern slavery as an aberration from the norm. In reality, it’s often a systemic issue embedded within everyday operational processes and in a company’s relationship with external suppliers.

That’s why it’s essential that organisations develop clear processes and guidance on human rights and undertake effective due diligence. We need to enable staff at all levels of the organisation to understand the risks of modern slavery, how it manifests itself and empower them to take responsibility to prevent it.”

Neill Wilkins, Programme Manager – Migrant Workers and Work With Dignity, Institute for Human Rights and Business

MIGRANT LABOUR: THE LIFEBLOOD OF CONSTRUCTION

Migrant labour is part of construction’s DNA and there is no doubting its importance both to the private and public sector.² Without attracting skilled and unskilled talent from other regions, many organisations would struggle to complete their major infrastructure programmes and prestigious building schemes.

From the perspective of unskilled labourers from low wage countries, many see working abroad as one of the only means of feeding their families and climbing out of poverty. At a national level, the economic importance of exporting labour to the home nation can be staggering.

Take Bangladesh: in 2009, migrant workers from the country sent home more than US\$10 billion. This was

12 times greater than foreign direct investment and six times more than total foreign aid received that year. In Nepal, remittances sent back by expatriates to their families in the same year accounted for 22.3% of GDP.³

This desperate financial need combined with endemic corruption causes the most vulnerable workers in the supply chain to be at greatest risk of exploitation.

THE CONSTRUCTION SECTOR: THE PERFECT CONDITIONS FOR EXPLOITATION

With its labyrinthine supply chains, stretching over countries and continents, construction provides the perfect breeding ground for exploitation and human rights abuses.

A single supply chain for a major contractor consists of hundreds of subcontractors, labour agencies and materials suppliers with complex inter-relationships. Having visibility over every transaction is impossible. Major contractors are usually set up to vet the first and second tiers of their supply chain. Beyond that, the view becomes increasingly murky.

Lack of transparency, combined with fragmented relationships between different tiers, enables those who want to hide human rights abuses to do so easily. While any respectable company will tell you they have policies and procedures in place to protect workers, the complexity of the procurement process provides ample opportunity to look away from issues that are too remote - or too embedded - to tackle.



¹ CIOB, *The Dark Side of Construction*, July 2015

² CIOB, *CIOB Perspectives: An Analysis on Migration in the Construction Sector*, March 2015

³ Dr Ray Jureidini, Qatar Foundation, *Migrant Labour Recruitment to Qatar*, July 2014

TACKLING MODERN SLAVERY: WHO SHOULD ACT FIRST?

If the global construction sector is to eradicate human rights abuses, wholesale change will be necessary. It will require new employment and recruitment models alongside forensic scrutiny of suppliers and purchasing methods. Organisations will be forced to acknowledge that policies alone are not enough. They must be backed up with hard evidence, measurable actions and strong leadership.

There is no denying that change will take effort and has a cost attached to it. Apart from not knowing where to start, a common fear voiced by companies is how much these initiatives will eat into their margins. There is a concern that organisations that act first would be forced to raise their prices, losing their competitive edge in an already cutthroat market.

But you could also ask: can you afford not to act? Public outcry at human rights abuses is growing, and in the age of the internet, global campaigns can take root in a matter of hours. For clients and organisations that choose to do nothing, the reputational risk looms ever larger.

The effects of new legislation, notably the UK Government's Modern Slavery Act 2015, will also ripple into global supply chains. EU countries can also expect changes under the Non Financial Reporting Directive. And human rights are covered in the UN's Sustainable Development Goals for 2015.

Organisations that act early are protecting their reputations and businesses, as well as future proofing themselves against increasingly stringent international legislation.

We will now look at the problem in more depth in the following sections: the first deals with supply of labour; the second examines the procurement process for materials.

“Over the next few years, attitudes to ethical procurement will start to reshape the industry in the same way that health and safety legislation and campaigns have done in the past. A commitment to ethical sourcing will surely strengthen tender bids – it will be a differentiator.”

Lydia Hopton,
Plan A Project Manager,
Marks and Spencer

LABOUR⁴

MODERN SLAVERY: HIDING UNDER RESPECTABILITY

A common assumption is that modern slavery only occurs in extreme circumstances, such as kidnapping, people trafficking and the exploitation of illegal migrants and children.

These obvious human rights abuses should not distract us from an additional uncomfortable truth: the millions of workers tricked into entering the industry through seemingly legitimate routes, and who quickly become trapped into bonded or forced labour conditions.

Lack of transparency, and the reluctance of these individuals to complain, ensures that this seemingly infinite supply of labour becomes assimilated into international supply chains. Modern slavery hides under a cloak of respectability.



“The global trend towards outsourcing, and pressure to constantly undercut in price, are significant risk factors for vulnerable workers. The worst paid are effectively subsidising the multinationals and taking the brunt of commercial pressures.

It's important that we start mapping out relationships across the whole supply chain. The labyrinthine transactions between subcontractors and their agents are where we should be looking first.”

Jill Wells, Associate, Engineers Against Poverty

⁴ This section relies on academic studies, NGO interviews and testimony from organisations working in the Gulf countries. Whilst some countries, notably Qatar, have recently introduced a series of policies to improve the lot of workers, many of the practices are still endemic in the region. NGOs have reported similar abuses in Asia, North America, Africa and Europe.

EXPLOITATION STARTS IN THE HOME COUNTRY

Many of the worst examples of human rights abuses relate to the unskilled labourers who travel to other countries for work. What follows is a typical scenario.

The conditions for worker exploitation are often established in the worker's home country, long before he – (and we will continue to refer to the worker as 'he' as the majority of construction labourers are male) – arrives on site.

Whilst licensed recruitment agencies exist in the big cities of countries such as Bangladesh, India, Nepal and the Philippines, they rely heavily on unregistered networks in rural towns and villages. The informal nature of grassroots recruitment and lack of any obvious paper trail provide many opportunities for corruption to start.

From the beginning, the worker is misled as to the level of wages that he will be paid. He will be charged a "recruitment fee" that is far higher than the actual costs. It could also exceed the legal limit imposed by his government. In addition, the agents and subagents that he encounters could be "double dipping" – charging both the employer and the prospective employee for the same service.

The more layers of involvement and bureaucracy the worker encounters, the higher the price he will ultimately pay.

PUTTING THE COSTS IN CONTEXT⁵

“There is little policing of what the recruitment agents actually do charge. Depending upon the level of exploitation, workers can lose up to 60% of their wages over a two-year period as they pay off their loans.”

Human rights worker **Marie Apostol** interviewed in Manila, December 2012

In India, the Ministry of Overseas Indian Affairs has stipulated a maximum of approximately \$320 [for recruitment fees], but in reality agencies charge three to four times that amount.

Amnesty International research in Nepal found that migrant workers paid an average of US\$1,400 fees to recruitment agents in advance of their departure. The scale of this debt is reflected in the fact that the Gross National Income per capita for Nepal in 2010 was US\$490.

RAISING THE CASH: THE TRAP

Although the recruitment fees are disproportionately expensive, the worker may decide to take the job out of desperation and economic hardship. He will be incentivised by assurances that he can quickly pay back the money through his "high" wages.

But without any collateral, the worker is unable to raise money from a legitimate bank and forced to sell possessions or turn to friends and family for loans. He may take money from loan sharks charging exorbitant interest rates.

Having paid the money to the agent, the worker is now vulnerable. He may be duped into signing a contract that he does not understand, that is not in his native language. The worker is effectively 'trapped' by the system before he has left his home country.

“The fee is not determined by the financial value of the good procured but by the demand itself..What the recruiter gets is not a fee for the recruiter's service, but a 'bribe'.”

Manolo Abella,
former Director, International Migration Programme,
International Labour Office (ILO)

ON ARRIVAL: THE IMBALANCE OF POWER

Arriving at his country of work, the worker realises that he has been tricked. He learns that his wages will be lower than agreed. His original contract could be substituted for another less favourable one.

Heavily in debt, and with his passport taken away from him, he is powerless to protest and will sign the new contract under duress. He realises that he will have to stay several years longer in the country just to pay off his loans.

Agents and employers take advantage of this clear imbalance of power. Abuses include forcing workers

to work for unreasonable hours, putting them in cramped and crowded accommodation, and even forcing them to take on second jobs in the evenings.

Fearful of deportation, and the possibility of threats made against their families, workers are intimidated into silence. They are unlikely to protest, even when interviewed.

⁵ All quotes taken from *Migrant Labour Recruitment to Qatar, as above*



COMMON ABUSES OF CONSTRUCTION LABOURERS

UNFAIR PAYMENT PRACTICES

Non-payment or late payment of wages. Employers not recognising all the hours worked. Illegal deductions. Some employers will delay payment for months or even years, leaving the workers literally starving, yet too frightened to complain.

INAPPROPRIATE ACCOMMODATION

Cramped, unsanitary, crowded conditions, often far from site requiring long commutes.

LONG WORKING HOURS

Workers forced to work in unsafe conditions and very long shifts. Agents may force them to work on multiple locations taking on more than one job.

RESTRICTION OF MOVEMENT

Workers have passports removed and are unable to leave the country or seek alternative work.

EXTRA CHARGES FOR FOOD OR ACCOMMODATION

Accommodation is far from food outlets so that workers must pay for expensive canteen food. Deductions for food are made from wages, even though workers were promised that food and accommodation were inclusive.

UNFAIR CONTRACTS

Contracts are not in the labourers' native language and they do not understand what they are signing. Despite this, the contract may be declared "legal" by employers and the courts.

THREAT OF VIOLENCE

Frequent threats of violence leave workers fearful and frightened to speak out.

LACK OF REPRESENTATION

Workers are unable to organise or form unions. They have no platform to raise issues with the client or main contractor.

RECRUITMENT FEES: WHERE DOES THE MONEY GO?

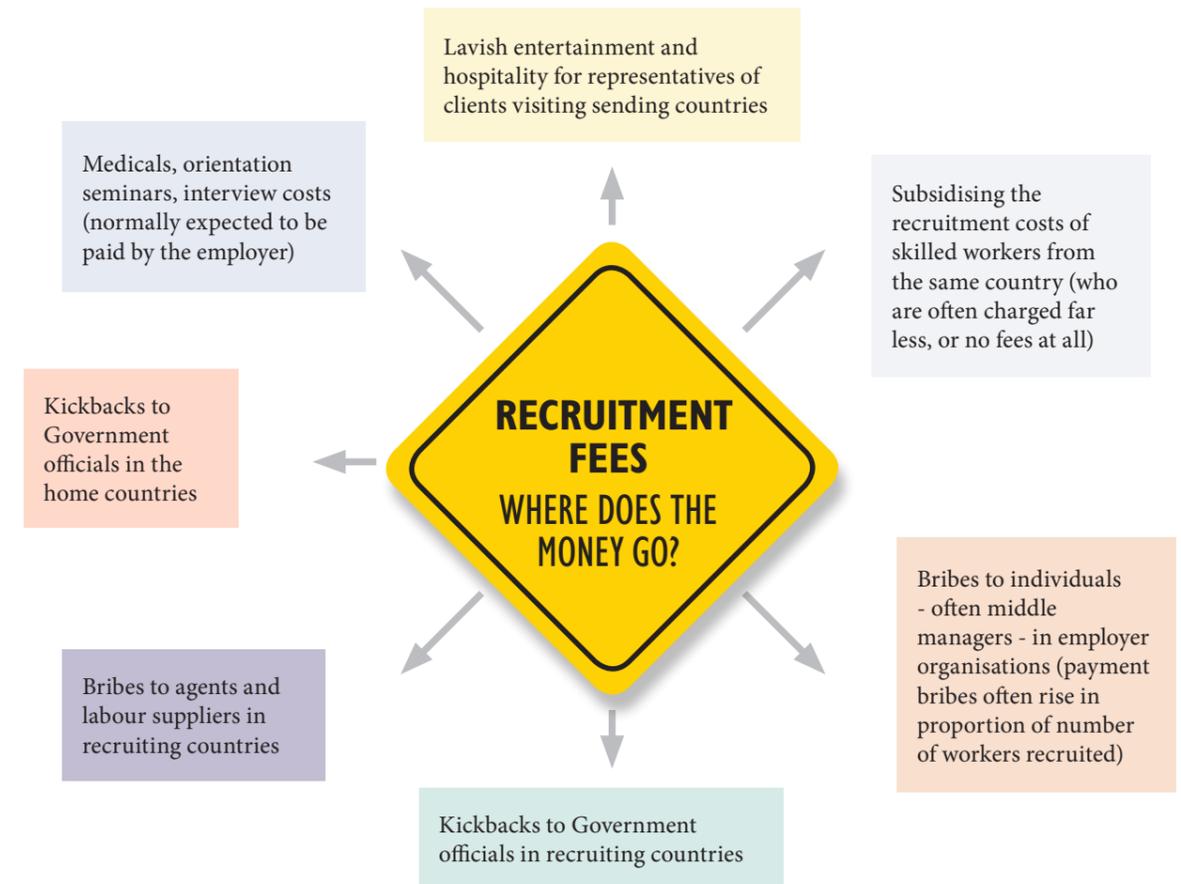
It is unfortunate but very commonplace that the low and unskilled workers – those that can least afford it – are forced to shoulder the financial burden of corruption.

The more layers of bureaucracy and middle men involved in the recruitment process, the higher the price that each individual will probably pay. Sometimes this is more than one or two years' salary.

As the diagram below illustrates, some labourers may also be victims of "double dipping" where agents are charging them for services that have already been paid for by the client or employer.

In many cases, skilled migrant workers on higher wages are not subject to the same level of recruitment fees, if they pay them at all. This implies that their recruitment costs have been subsidised by their lower paid colleagues.

It is not only the agents that take advantage of the situation. In some regions, employers routinely apply double standards: they refuse to pay the recruitment costs of unskilled labourers, but are happy to pay the cost for skilled workers - such as foremen, supervisors, safety officers and engineers - from the same labour source countries. This is a conscious business decision that discriminates against the most vulnerable workers in the supply chain.



MIGRANTS AT RISK IN THEIR HOME COUNTRIES: CHINA AND INDIA

Labourers can be considered migrants and face discrimination even within their own countries. Rural migrant workers that move to construction projects in Chinese cities are often taken on without written contract and have no real basis to claim any labour rights on pay, working conditions or social insurance. They are also forbidden to take up permanent residence.

The Chinese system creates a sharp divide between skilled workers and unskilled rural workers. To put this in context, unskilled workers account for 80% of the sector workforce. The Chinese construction sector employed 45 million unskilled workers in 2011, and the majority were labouring outside their own township.⁶

A research project sponsored by the Economic and Social Research Council and the UK Government Department for International Development (DFID), which looked at employment in the Greater Delhi area of India, found that 99% of labourers were migrants from other regions of India, notably Bihar, Uttar Pradesh, and West Bengal:

“The great bulk of labourers (94%) have no formal labour contract. So there is no formal employment relationship. They do not even know who their employer is. And as the construction industry has grown rapidly and become more concentrated at the top, the chain of subcontracting for both work and workers has become more complicated.”⁷

In surveys carried out for the project, many workers complained of low wages, irregular payment and very long working hours. A quarter of labourers were female and had often moved to the sites with their families. The women were restricted to low skilled work and their pay was typically 25% lower than their male colleagues.

“As directors unearth abuses within their supply chains, a seemingly logical response would be to immediately terminate the contracts of the offending organisations. This may ease consciences of the boardroom, but will do little to help the labourers who may be stranded without money, food, passport or visa in an even more perilous position than before. When penalising subcontractors, make sure that provision is being made to look after the labourers”

Jill Wells, Associate, Engineers Against Poverty

⁶ Centre for Development Policy and Research, School of Oriental and African Studies, *The Deterioration of Labour Conditions in China's Construction Sector*, *Development Viewpoint Number 77*, June 2014

⁷ Centre for Development Policy and Research, School of Oriental and African Studies, *Documenting the Lack of Labour Rights in India's Construction Sector*, *Development Viewpoint Number 80*, July 2014. The research for both newsletters was part of an ESRC-DFID project, *Labour Conditions and the Working Poor in China and India*

NGO REPORTS: SUPPLY CHAIN FAILURES IN PRACTICE

Qatar's construction projects are attracting widespread media attention, not least because the State will be hosting the FIFA World Cup in 2022.

The following section summarises findings of two reports that examine human rights abuses in the region. The first part is based on Verité's report *An Exploratory Study on the Role of Corruption in International Labour Migration*⁸ which investigates the endemic problems in migration corridors.

The second section is based on Amnesty International's report *The Ugly Side of the Beautiful Game, Exploitation of Migrant Workers on a 2022*

*World Cup Venue*⁹, which explains how migrant labourers are subsequently exploited in the country of work.

Although the evidence is mainly focused on this small nation, many of the lessons and recommendations can be applied to the wider Gulf region as well as other continents. The responsibilities of clients and all stakeholders are also explored.



REPORT I: MIGRATION CORRIDORS AND CORRUPTION

Many countries have already introduced laws and international bilateral agreements to protect workers in the international recruitment process. But, as Verité's report, *An Exploratory Study on the Role of Corruption in International Labor Migration*, explains, these protections are easily bypassed through corruption in the sending and receiving nations. The report observes that “corruption and fraud in recruitment are closely intertwined and mutually reinforcing.”

The form that corruption can take is “specific to each country and each recruitment corridor,” even though different routes are likely to share similar dynamics.

“In the Nepal-Qatar corridor, heavy visa documentation requirements and the distance between countries combine to encourage frequent visa fraud, both with and without migrants' cooperation. In contrast, in Myanmar-Thailand, fluid borders and a large network of unregistered [recruitment agents] result in easy undocumented migration, but with high levels of bribes to officials along the way. In Malaysia,

a disadvantageous legal context places heavy financial burdens on workers upon arrival.”

In addition, broker subcontractors and broker-employer intermediaries add to the risk of corruption, as well as driving up migration costs.

Take the example of Nepal, where corruption in foreign employment amounts to more than US \$194.7 million a year.¹⁰ In that country, obtaining a foreign worker permit can involve up to six discrete stages of verification and pre-approval. Each step presents an opportunity to extract a bribe or corrupt payment.

⁸ Verité, *An Exploratory Study on the Role of Corruption in International Labor Migration*, January 2016

⁹ Amnesty International, *The Ugly Side of the Beautiful Game: Exploitation of Migrant Workers on a Qatar 2022 World Cup Site*, March 2016

¹⁰ According to a ‘conservative estimate’ by the World Bank in 2010

Examples of costs paid by the recruitment agents include

- Between US\$300 – \$500 per worker paid to Qatari employers in order to secure demand letters for labour supply contracts.
- A ‘commission’ of US\$30 – \$100 paid per worker for each level of approval required at Nepal’s Department of Employment. *“The amount varies depending on the job, number of workers and the tenure of the officials at the various levels – new appointees ‘charge’ more than their more seasoned colleagues”.*
- The travel, accommodation and entertainment expenses of Qatari employer representatives or their recruitment agents who travel to Nepal to interview prospective workers or conduct skill tests.
- Airport bribes of between US\$5 – \$100 per worker to clear immigration.

Once in Qatar, an opaque payment system is required for processing visas which represents “a substantial bribery and corruption risk”.

Qatari law prohibits recruitment fees being charged to workers. But Verité notes:

“Although some employers that use Qatari agents pay a fee and a portion of recruitment related expenses, the reality is that the duly appointed Nepali manpower agents are not paid professional services fees by their client or principal. In fact the Nepali manpower agents actually cover or reimburse all or a significant portion of the Qatari employer’s costs and/or their local recruitment agents fees through the pay to play kickback commissions. These illegal payments are ultimately passed onto workers in the form of recruitment fees that invariably render them vulnerable to forced labour.”

Verité’s research indicates that the bribes paid by Nepali manpower agents on behalf of their Qatari clients enable employers to avoid the legitimate and reasonable costs of recruitment. Most of these fees are passed on to the migrant workers who are typically paying recruitment fees ranging from US\$1,350 – \$1,800.

The indirect benefit - or savings - to employers of avoiding these costs is estimated to be between US\$900 – \$1,400 per worker.

Once arriving in Qatar, depending on the situation with the agent and employer, workers are at risk of further fees, such as residency permits, medical testing and a health card, which could amount to a further US\$380 dollars. They may have to endure further unexpected deductions from their wages.

Verité is recommending that, as well as strengthening laws, reconfiguring and streamlining the migration processes could reduce opportunities and motivation for corruption.

However Verité acknowledges that many of the processes currently in place were often motivated by the goal of protecting workers and providing oversight, as well as meeting the reasonable needs of destination countries and employers.

“Certain processes, such as obtaining a passport and visa, will not be eliminated anytime soon, even if they can be made more efficient and less prone to corruption. It will be important to carefully monitor and evaluate efforts, for instance to move key migration processes online and thereby reduce the number of stages of recruitment and perhaps opportunities for bribes...Simply put, migrants’ rights cannot be successfully fulfilled without addressing corruption.”

VERITÉ’S MESSAGE:

The most important steps that companies can take to mitigate the risk of workers being exploited and exposed to debt bondage is to ensure that the **employer pays all of the recruitment related fees and expenses** necessary to bring foreign workers to their project, and that **third recruitment party agents are effectively screened and managed.**



REPORT 2: EXPLOITATION OF WORKERS ON A WORLD CUP STADIUM

Qatar’s ambitious economic growth strategy, including the FIFA 2022 World Cup construction programme, is fuelling demand for foreign labour. In 2015, migrant workers totalled 1.7 million, accounting for 90% of the total workforce. The workers were predominantly from South Asian countries.

In a scenario typical to the wider Gulf region, every migrant worker in Qatar must be sponsored by an employer. Under this system – known as kafala – they are unable to change jobs or leave the country without their employer’s permission. This puts workers at risk from systemic corruption and abuse. As Amnesty International points out:

“The sponsorship system gives employers significant power over migrant workers they employ. It is therefore extremely difficult for migrant workers to leave exploitative situations as the individual responsible for the labour abuse is also the individual who must give the worker permission to leave Qatar.”

Based on interviews with 234 migrant workers in Doha, who were either working at the Khalifa International Stadium or the surrounding Aspire Zone, Amnesty’s report observes that *“most of the workers interviewed ...were visibly in a state of distress because of their treatment.”*

In recent years, Qatar has passed laws to protect workers and also entered into bilateral agreements with labour-supplying countries such as Nepal. In addition, the Supreme Committee for Delivery and Legacy (responsible for managing the 2022 World Cup construction programme), has issued a set of mandatory worker welfare standards to protect human rights. However, as the report illustrates, the sponsorship system and systemic enforcement failures are undermining the effectiveness of these labour protections.

Recruitment fees

Although Qatar strictly prohibits contractors from working with recruitment agents that engage in unethical practices such as charging workers recruitment or processing fees, all 234 migrant workers had been forced to pay fees ranging from US\$500 – \$4,300 to obtain work in Qatar.

The majority of interviewees had been deceived as to the level of pay or type of work that they would do. All but six were receiving lower salaries than promised. In the worst cases, the salary was half that agreed in the original contract.

For example: Ubarj¹¹, a Nepalese electrician working on the Khalifa Stadium signed a contract in Nepal for a salary of US\$300 plus \$50 for food per month. However, on arrival in Qatar, he was handed another agreement for US\$190, plus his food allowance. Although recruited as an electrician, he was moved after two months into iron fitting work.

But when Ubarj complained, his manager’s response was: *‘Work for another 1-3 months and accept whatever you get. If you don’t work you won’t get paid and you won’t get your passport back.’ After that I just kept quiet. I had no choice,*” Ubarj told interviewers.

Having paid a recruiter US\$1,000, metal worker Rajiv believed he would be paid around US\$800 per month in Qatar. He was given an agreement to sign in Nepal in a language that he did not understand. On arrival, his actual salary was US\$300.

¹¹ Names in Amnesty International’s report have been changed to protect interviewees

High risk of forced labour

Delayed payment, non-payment of wages or the threat of deportation were used as threats against workers that were already in financially vulnerable situations. Others feared being denied exit permits. All these factors, along with the confiscation of passports, put the migrant workers at high risk of abuse, including working under forced labour conditions.

The report found that workers on the Khalifa Stadium faced payment delays of up to ten months.

“They reported not being paid for the first three or four months after arriving in Qatar. Although they were subsequently paid monthly, their pay was permanently several months in arrears. This practice is of significant concern because it appears to be used as a threat in some cases the workers are told that if they do not continue working they will not get the pay that is owed to them.”

The report highlighted the plight of Hrishkesh, a 28 year old metal worker from India who had not been paid for ten months.

“...I just want the money still owed to me and then I want to return home...My manager says he will help me to get a [exit] permit [to leave the country]. He said the company will pay for my air fare and give me US\$25 nothing more...I did not complain to any officials. Who would I speak to? I am too scared the company will punish me if I did.”

Migrants also experienced problems with residence permits, facing delays in having them issued or renewed. This effectively left them trapped in the work camps. Some Nepalese workers also complained of not being allowed to return home to check on their families after the earthquake that devastated their country in 2015.

“My life is just the worksite and my camp. Because I do not have my ID I am too scared to travel anywhere else. I do not want to be taken by the police,” said Khalifa Stadium construction worker Mahesh.

Amnesty International’s recommended actions¹² :

The Qatari authorities were urged to reform the sponsorship system - enabling workers to retain their passports, change employment or leave the country without having to seek employer’s permission

- To increase the monitoring of workers arriving in Qatar, so that on arrival the terms of each contract has been checked in the presence of government officials, the employer and the worker.

The **Supreme Committee for Delivery and Legacy** was criticised for focusing too heavily on major contractors:

“Given that the greatest risks are linked to small sub-contractors and labour supply companies, this approach is a serious limitation to the effectiveness of the [Worker Welfare] Standards.”

“...Some of the most egregious abuses that Amnesty International documented on Khalifa Stadium were perpetrated by labour supply companies that the Supreme Committee did not even know were involved with the project.”

Recommendations for the Supreme Committee included:

- Requiring the main contractor on any World Cup site to identify all workers on site and the companies they work for, and to make the information publically available.
- Requiring all contractors on World Cup projects to identify the recruitment agents they use and the names of the counterpart recruitment agents in the sending countries.
- Carrying out independent monitoring of each World Cup project. Penalising companies that breach standards.

FIFA was criticised for failing to establish a human rights due diligence process both before the awarding of the World Cup to Qatar in 2010 and during the following years.

Recommendations to FIFA included:

- Carrying out and publishing results of its own independent inspections of worksites and living accommodation.
- Establishing a due diligence process addressing all human rights abuses directly linked to or associated with the 2022 World Cup, including specific measures on how the abuses will be addressed.
- Publicly asking the Qatari authorities to reform of the sponsorship system and labour laws with a concrete timetable of reform in time for construction peak of World Cup projects in Qatar in mid-2017.

Main contractors were criticised for allowing subcontractors and recruitment agents to self-audit their worker welfare standards without carrying out independent verification. *“In Amnesty International’s experience, the companies that are most likely to abuse rights that also abuse the self-reporting process.”*

Major contractors were urged to work with the Supreme Committee and Qatari authorities to develop a framework for taking remedial action on abuses discovered in the subcontracting chain and to do this in a way that would not negatively impact migrant workers.

Further recommendations included:

- Contractors fully complying with the Qatari and International Labour Standards.
- Respecting workers’ rights to freedom of movement, allowing workers to hold their own passports.
- Making a public commitment that no workers are paid more than one month in arrears.

Governments of migrant workers countries

Amnesty International also called on governments of labour supply countries to strengthen and enforce regulation of recruitment companies to protect workers from predatory recruiters.

Major sponsors and partners

Major sponsors and partners were urged to put pressure on FIFA, the Supreme Committee and Qatari authorities to address human rights abuses on World Cup projects.



¹² For a full list of recommendations, see Conclusion chapter starting page 73 of Amnesty International’s report

WORKER WELFARE: GETTING STARTED

As the previous section demonstrates, abuse of labour in our supply chains is not an issue that can be tackled easily. Hundreds of agencies and sub-agencies supply labour to large projects. Corruption, lack of documentation, intimidation and secrecy ensure that the intricate web of relationships is difficult to unravel.

Human rights abuses could be occurring with or without the knowledge of company directors or government officials. And whilst legislation, international agreements and company protocols can be cited at length, the system is failing in developed as well as developing nations.

Long term engagement, training and education are necessary to bring about a step change in behaviours.

NGOs and others actively grappling with these issues also caution against kneejerk reactions: the plight of workers involved with live projects should always be considered when penalising agencies and contractors.

The following steps and suggestions are based on the experiences of organisations both inside and outside the built environment sector that are working towards more transparent supply chains.

THE TOP PRIORITY: TACKLING RECRUITMENT FEES

“ If your company or contractors are not paying all of the recruitment related fees and expenses necessary to bring foreign workers to your project then those costs are almost certainly being passed on to workers through a series of unethical and unscrupulous agents and corrupt government officials. Hoping that your recruitment agents adhere to whatever legal fee limits exist is not a sufficient safeguard as the actual hard costs of migration are far greater.

Employers that do not pay all recruitment fees and expenses or ensure their recruitment agents conduct business ethically and lawfully, are complicit in exposing their workers to the risk of bonded labour and other exploitative practices. ”

Declan Croucher, Director of Advisory Services, Verité

As illegally charged recruitment fees are the root cause and driver of much exploitation of migrant workers, eradicating them from supply chains should be a priority for all clients and tier one organisations.

The Leadership Group for Responsible Recruitment was launched in May 2016 to tackle this problem. Convened by the Institute for Human Rights and Business (IHRB), the aim of this international cross-industry initiative is to eradicate recruitment fees from supply chains within the next decade.

Founding companies, which include Coca-Cola, HP Inc., Hewlett Packard Enterprise, IKEA and

Unilever are promoting the Employer Pays Principle, specifically that employers, rather than employees, should pay recruitment costs. The group is urging that the principle is embedded within industry codes of conduct and company policies in every sector.

For more information contact the IHRB or see the website: www.ihrb.org/our-work/migrant-workers-and-work-with-dignity.html

“ Modern slavery is a hidden crime and is difficult to uncover. Comprehensive best practice capacity building training is essential and should be tailored to different functions and sectors. CEOs and board directors should understand their responsibilities to prevent and address the risk of adverse impacts on human rights linked to their business activity. Procurement teams need dedicated support in establishing responsible sourcing programmes to prevent and eradicate forced labour and labour trafficking from their supply chains; human resource departments should understand the good practice to prevent and deal with hidden exploitation that may be taking place within their business and through recruitment suppliers; supervisors will benefit from awareness training to spot the signs of worker exploitation. Lastly, but by no means least, all workers should be trained in how they can report exploitation without fear of reprisal. Training should be a rolling, ongoing process, it needs to be refreshed and updated regularly ”

David Camp, Stronger Together Programme Lead and Chief Executive, Association of Labour Providers

SHORT TERM MEASURES

Cutting out the middle men and moving towards direct labour models would go a long way to reducing risk to labourers. Where this is impractical, closer vetting of agents, both those in a labourer's home country and work country, could also have a positive impact.

RESEARCH, EDUCATE, COMMUNICATE

- **Map out your supply chain.** Investigate the relationships between agencies and suppliers.
- **Don't try and do everything at once.** Identify the biggest areas of risk and start there. Focus on a geographical area, or a certain supply of labour.
- **Create a robust worker welfare policy** and make sure that it is central to operations. See case study 3 (p32).
- Ensure that there is **accountability internally**, at board level.
- **Educate staff** about modern slavery. Implement tailored training and support for each level of the business.
- **Supervisors and managers** should receive written notification that accepting inducements or any form of worker mistreatment, coercion or harassment will be regarded as a gross misconduct offence.

VISIT LABOURERS IN THEIR PLACE OF WORK

- Use **independent parties** to interview labourers.
- Ensure that interviews are carried out in **confidence, away from the worksite and without the participation of management.**
- Interview **different nationalities.**
- **Staff from Tier 1 contractors and clients** should regularly engage with workers to **build trust**, for example, eating together, exchanging language lessons, organising social events.

SCRUTINISE AGENTS

- Use **indicative pricing statistics** to assess quotations and fees from agencies that offer or are charging suspiciously low rates.
- Chose a **selection of agents** in the most "at risk" areas.
- Carry out **background checks** on the agents.
- **Ask** who is paying recruitment fees.
- **Include recruitment processes** in company audits.

BE MINDFUL

- Any labour supplier that claims that they will pay the recruitment costs **should be treated with suspicion.**
- These issues are complex. Avoid a **tick-box mentality.**
- Do not try to create a parallel auditing regime: **embed the policy into your existing systems.**
- **Audit fraud** is widespread in many countries. Treat **self-auditing schemes** with **particular caution.**
- Many migrant workers may lie about paying recruitment fees because they are desperate not to lose their jobs. **Build up trust** with them, and do not necessarily believe the first answer that they give on arrival. It is **good practice** to ask them about recruitment fees after they have been in work for a month and to repeat the question after six months when they are feeling more secure.

“As a starting point, I would encourage any organisation to check out the Dhaka Principles for Migration with Dignity, as set out by the Institute of Human Rights and Business. Initially developed for the garment sector, this is a concise and powerful tool for driving the agenda for change and I strongly commend it as an excellent overview of the issues with very helpful guidance”

www.dhaka-principles.org

Don Ward, Chief Executive, Constructing Excellence

“Human rights abuses are so deeply buried within supply chains that merely creating a box-ticking or compliance exercise will neither get to the root of the problem nor protect the most vulnerable workers.

Systems should be backed up by a strong inspection regime. Ensuring that remote sites and places of work are regularly visited is essential.”

Mustafa Qadri,
Gulf Migrant Rights
Researcher,
Amnesty International

PRACTICAL STEPS

Ensure that:

- Money is paid directly into bank accounts.
- All staff, including agency workers, have a written contract.
- Workers receive wage slips and are able to understand any deductions that are made.
- There is a safe storage area for passports.
- Anonymous phone lines are set up for workers to report abuse.
- Employees have a safe forum to discuss and understand their rights.
- A confidential grievance process is established that includes agency workers.
- Unauthorised deductions for food, accommodation or equipment are investigated.
- Managers and site staff are given training to spot abuse and human rights violations.
- Hours worked are monitored. Triggers are in place to investigate excessive overtime. Check that recorded hours match hours actually worked.
- Worker accommodation is safe and meets internationally recognised standards.
- On projects where workers are not living in camps, all addresses, including those of agency workers, should be recorded and checked. Investigate where numerous staff list the same address, as this indicates high shared occupancy.

MEDIUM TERM MEASURES

“ Internal change must be led from the top of an organisation. It took more than a year for us to develop our global worker welfare policy, and this involved intensive collaboration between 12 departments and our NGO partner Verité. Having so many functions collaborating together was a unique moment that would have been impossible without the support and sponsorship of our CEO and head of operations.

Now that we are rolling out the policy, our focus is on training and empowering employees. This is not a checklist or a bolt-on; it has to be embedded deep within our operations. ”

Theresa Loar, Senior Vice President, International Government Affairs, CH2M – See case study 3 (p32)

- **Set long term strategy by referencing international guidance** produced by organisations such as the UN Global Compact, the Ethical Trading Initiative, Institute for Human Rights and Business, OECD or the International Labour Organization.
- **Identify gaps in compliance** between local laws and international standards on human rights. Where this occurs, **enhanced due diligence** is required.
- **Pay all recruitment costs.** The actual costs of recruitment would be considerably cheaper than those paid by the workers.
- **Move towards more transparent reporting**, both internally and externally.
- **Increase the amount of directly employed labour** on a project.
- **Embed client representatives inside recruitment firms**, ensuring that best practice is followed.
- **Work with suppliers to raise awareness of the issues**, supporting them in bringing change.
- **Change contracts to introduce harsher penalties and termination clauses** if suppliers do not comply with policy.
- **Conduct site audits and initiate surprise inspections.** It is important that the supply chain is held to account.

“ Our commitment to sustainability was solidified in 2009 when we became a signatory of the United Nations Global Compact. The UNGC was a natural ‘home’ for us and the framework empowered us to harness our business values of leadership, excellence, trust and sustainability in support of the UNGC Pillars of human rights, labour, environment and anti-corruption. By doing so, and doing the right thing, we are leveraging sustainability to drive competitive advantage for our business. ”

Martyn Coffey, Chief Executive, Marshalls plc – See case study 5 (p43)

LONG TERM MEASURES

STRATEGIC STEPS for industry groups and governments

- Encourage the establishment of **ethical recruitment agencies**. Pockets of good practice do already exist in Goa and the Philippines, often with government involvement.¹³ See also case study 1 (p28) on private recruitment agency FSI.
- Governments to **invest in more inspectors** to enforce compliance of workers’ rights.
- **Industry groups to work with clients** to raise awareness of human rights issues in supply chains, encouraging tighter contracts and policies that protect workers’ rights.
- **Professional bodies** to introduce training packages and guidance for their members, and to hold members to account.
- **Contractors to collaborate in industry forums**, sharing information on suppliers and best practice.

- Governments to establish **bilateral labour agreements**, using **technology** to eradicate abuses. For example, the Nepalese and South Korean governments have established a bilateral agreement which uses an **electronic permit system** for recruitment.
- Industry groups and governments to lobby for the right of workers to **organise and join trade unions** in countries where it is currently illegal.
- **Governments** to work together to **reinforce legislation**.

Looking forward: disruptive technology

Technology is already disrupting many parts of the construction sector, from BIM to electronic procurement. In the future, technology could be used in a variety of ways to detect exploitation, including monitoring worker welfare, tracking transactions and detecting non-compliance.

¹³ Dr Ray Jureidini, Qatar Foundation, *Migrant Labour Recruitment to Qatar*, July 2014



CASE STUDY I

THE MANPOWER AGENCY

FSI Worldwide: building an ethical recruitment infrastructure globally

FSI Worldwide specialises in the ethical recruitment of migrant labour from the Asian subcontinent and Africa.

The company was founded in 2006 by former British Army Officer Tristan Forster and three professional associates with the aim of supplying ex-Gurkha soldiers to the security sector. Subsequently, FSI's recruitment pool has expanded to include civilian personnel for jobs in construction, facilities management, maritime, oil and gas and hospitality. FSI also provides training and specialist consultancy services on labour issues, supply chain auditing and Trafficking in Persons awareness.

With established networks in Nepal, India and Kenya, FSI is expanding into new recruiting territories including the Philippines, Uganda, Zambia, Zimbabwe and Sri Lanka. The company supplies migrant workers throughout the Gulf region and Asia.

FSI's core mission is to protect migrant workers that would otherwise be vulnerable to modern slavery or bonded labour. Its business model is based on the principle that investing in people enhances productivity and is ultimately more beneficial to employers than the corrupt recruitment and management practices that are endemic in the developing world.

CEO Tristan Forster was awarded the prestigious *Business Leaders' Award to Fight Human Trafficking* by the United Nations in Davos in 2013.

The challenge

As this report has illustrated, many of the root causes of modern slavery can be traced back to the labour source countries. Multiple layers of bureaucracy, combined with fragmented and opaque recruitment networks, are conducive to corruption and exploitation. These systemic problems are reinforced by cultural assumptions, both from the exploiters and the exploited.

"People in positions of authority expect to benefit personally from the process. They expect to receive money for their services over and above their salaries, it's seen as normal," Forster says.

He adds that client representatives usually expect to be treated with lavish hospitality when they visit, a cost that is ultimately passed to migrant workers.

On the other side, many migrant workers expect to pay bribes, partly because of the surrounding culture, and partly due to the desperation which arises out of extreme poverty.

"We make it clear to workers that they don't have to pay any money. We explain the process to them. But they still try to pay to get to the front of the queue because they feel so desperate. The prevailing attitude in the developing world is that if you want to work abroad you have to pay for it," Forster says.

The strategy

Minimising risk at grassroots recruitment level:

In labour supply countries, traditional manpower agencies usually have offices in the capital city and rely on an informal network of agents, thus increasing the risk of corruption and exploitation.

By contrast, FSI has built a vertically integrated recruitment and management system, in which it controls all aspects of the labour supply chain, from rural villages to overseas workplaces. Instead of relying on agents, FSI staff, who are fully trained and committed to ethical recruitment policies, travel to remote rural areas to conduct screening and skills testing. This minimises initial costs for the candidates, who would normally travel to their capital city for interviews.

“People in positions of authority expect to benefit personally from the process. They expect to receive money for their services over and above their salaries, it's seen as normal.”

As the business matures, FSI will be training up and developing a network of local people in rural areas to support these activities and embed a culture of ethical recruitment.

A robust approach to bureaucracy

Consistently operating with integrity is a powerful means of combating endemic corruption. From the outset, FSI makes it clear that it does not behave like a standard manpower agency.

"The bureaucrats who are used to receiving illicit benefits from the corrupt actors don't necessarily love what we do [in terms of ethical recruitment] but, over time, they have begun to understand that we are operating in a way that it is of benefit to the individuals and the country."

Forster advises:

- **Operate consistently with integrity.** Send out the strong message that you are not the kind of organisation that pays bribes. If it becomes known that you have given in, you will have to pay all future bribes.
- **Make all applications watertight** in terms of presentation. Follow the rules precisely. This makes it difficult for bureaucrats to make excuses to slow the process.
- **Stay on top of legal minutiae and changes in the law.** Be aware that officials might put their own particular spin on the bureaucracy to gain leverage. Be ready for that.
- **Build strong relationships** with the individuals in the system. It's an educational process and it takes time. When they leave their post, be ready to start all over again with the newcomer. It is exhausting, but necessary.

Educating clients

Sometimes – but not always – FSI's recruitment process can take longer than other manpower agencies. This is partly due to the company's refusal to pay bribes. Therefore, client education is also necessary.

"Our clients sometimes ask why our recruitment process takes as long as it does. The answer is that we're going through the proper process and that takes time. Although clients may have to wait a little longer, they will receive a properly trained and motivated workforce with the appropriate skills. This obviously yields benefits over the longer term," Forster says.

Enforcing the Code of Conduct

Staff at FSI's offices have been selected on the basis of their inclination to work ethically. The company also sets out a clear code of conduct for employees.

Nevertheless, Forster acknowledges that external pressures can still put internal procedures at risk, even with the most trusted teams. As a result, FSI continues to innovate to ensure that staff are behaving with integrity.

Measures include sending moles regularly through the recruitment process to monitor procedures. The company recently invested in high tech cameras for covertly filming interactions.

FSI is also introducing a polygraph system and will be carrying out random lie detector tests at all levels of the business, from the CEO downwards.

"This is not only protecting the treatment of migrant workers," Forster says. "It's also checking that other parts of business are being conducted ethically, for example, ensuring that people are not taking kickbacks and are not open to coercion."

Holding clients to account

Before agreeing to supply migrant workers to organisations, FSI carries out due diligence on clients and employers, checking that there are enough systems in place to protect workers. Having successfully placed workers in employment, FSI will continue to monitor them for the duration of the contract.

"This is not only to verify that our workers are performing to the expected standard, but also that the

clients are fulfilling their side of the bargain. We are prepared to walk away from contracts where client is not acting with integrity,” Forster says.

Looking ahead

FSI is currently placing 1,000 workers a year into work, but with new contracts in Dubai, Qatar and growing interest from clients in Southeast Asia and New Zealand, the company’s operations are set to expand significantly.

As well as expanding into new territories, FSI is hoping that third party organisations will be able to carry out pilot studies on some of its projects.

“We want independent evaluation of the impact of ethical recruitment from a socio-economic perspective as well its effect on productivity,” Forster says. “There is no doubt that the impact will be significant, which will hopefully encourage more investment in ethical practices.”

Conclusion

Forster and his team are defying the odds, proving that migrant workers can be protected even in cultures where corruption is endemic. But Forster stresses that, on a macro level, little has changed in recruitment practices in the ten years that FSI has been operating.

“The status quo has not changed. Workers from developing companies continue to pay money to obtain work. This remains the biggest problem in the sector. I’m still meeting clients that are trying to pay below minimum wages and not expecting to foot the bill for recruitment costs. This is pretty shocking, especially from western organisations, but the attitude is still there.

“Clients need to take some of the blame. They’re putting policies in place and not enforcing them. They’re also awarding contracts on a low cost technical compliance basis. As a result, contractors are not factoring recruitment costs into their bids.

“If we are really are going to make a difference, companies at the top of the supply chain will have to start investing at the bottom of the supply chain. You cannot expect to protect vulnerable people by passing off responsibility to lower tier companies. You have to be prepared to invest in the more robust processes and procedures.”

“Clients need to take some of the blame. They’re putting policies in place and not enforcing them. They’re also awarding contracts on a low cost technical compliance basis.”

Summing up:

Forster’s advice to clients and tier one organisations

Insist. Be clear as to what you want to happen. Insist that zero fees will be paid by anyone coming into the supply chain.

Invest. If you want to have ethical recruitment, it’s important to invest.

Inspect. Do a deep dive into the countries that your subcontractors are recruiting from. Be prepared to take on more direct recruitment yourself. A third party consultant would be able to quickly tell you whether or not your model is working.

Investigate. Continue to find innovative ways to check your processes are working. Things can go wrong even with your most trusted workers.

Be consistent. Send out a clear message to the authorities and bureaucrats.

Be patient. Appreciate that the recruitment process may take a little longer, but will be more beneficial to all parties in the long run.

www.fsi-worldwide.com



CASE STUDY 2

THE MANUFACTURER

Hewlett Packard: switching to direct labour

Switching to direct labour may seem a daunting or nearly impossible task for many multinationals. But consumer giant Hewlett Packard has already made this commitment.

In 2014 it became the first company in the IT sector to require direct employment of foreign migrant workers in its supply chain.

The HP Foreign Migrant Worker Standard, the latest addition to the company’s Supplier Code of Conduct, also includes rights relating to worker retention of passports and personal documentation and the elimination of worker-paid recruitment fees.

“Conditions that contribute to any form of forced labour are unacceptable in our supply chain,” said Stuart Pann, senior vice president, PPS Operations. “This initiative underscores our commitment to continually improving our supply chain, one of the largest in the industry, and to demonstrating leadership that encourages other companies to advance their responsibility to protect vulnerable worker populations.”

To ensure implementation of this standard, HP has added specialised forced labour audits and regular monitoring to its supply chain responsibility programme. The company says that suppliers that do not meet the standard will be required to “correct their practices with urgency and may be subject to internal HP escalations, remediation programs and risk discontinuation of business with HP.”

“This initiative underscores our commitment to continually improving our supply chain, one of the largest in the industry, and to demonstrating leadership that encourages other companies to advance their responsibility to protect vulnerable worker populations.”



CASE STUDY 3

THE CONSULTANT

CH2M: creating a global worker welfare policy

Founded in the USA in 1946, CH2M is a global engineering and consulting firm working in more than 50 countries and directly employing 25,000 people.

CH2M works on infrastructure and engineering projects around the world. Recent high profile projects include Crossrail and the Thames Tideway Tunnel in London, the Metrolinx Rapid Transit Programme in Toronto and Dubai's new economic centre, Business Bay. CH2M serves as a technical consultant for the 2022 World Cup in Qatar and provided initial program management services to the host committee.

CH2M has been named one of the world's most ethical companies by the Ethisphere Institute every year since 2009.

The starting point:

"CH2M's ethos has always been to promote sustainable working practices. As we have expanded our portfolio in the Middle East and Gulf, we have been identifying new ways to apply international best practices on worker welfare," says senior vice president of international government relations and public policy, Theresa Loar. "As advisors to our clients, we do not directly employ contractors or labourers, but we have started to explore how we can make a difference not just within individual programmes and the region, but worldwide."

The catalyst:

CH2M employed the services of ethical labour expert Verité, an NGO that helps multinationals develop and uphold fair and safe employment practices within their supply chains.

After a comprehensive operational review, Verité recommended that CH2M develop a global policy on worker welfare.

The challenge:

CH2M's aim was to embed the new policy deep within its operations. But for an organisation encompassing a broad range of activities from design to programme delivery, combined with a globally-scattered workforce, this was no simple rollout. A number of different stakeholders and operations would need to be involved.

The approach:

Twelve departments were identified that would be directly affected by the new policy, including procurement, legal, human resources, risk and health and safety. A policy task force was set up, formed by a representative from each of the departments.

"It took some time to understand and accommodate the needs and challenges that the various stakeholders faced," says global corporate affairs manager Tawny Chritton who coordinated meetings across several time zones. "But everyone was committed to making this happen."

Loar adds that having buy-in from the very top of the organisation energised discussions.

"Our CEO, Jacqueline Hinman, championed this from the very beginning. This encouraged and informed everything we were doing. It was also significant that our executive vice president, Mike Szomjassy, who headed operations globally for the firm, was our executive sponsor for this initiative. Senior support enabled us to bring different teams and operations together."

Verité worked with CH2M throughout the policy development period and was another important influencer, sharing its experience of other sectors.

“In our wider role as a project consultant, the policy encourages us to share worker welfare best practices with clients and others in our industry.”

"It took a lot of commitment to take this to the finish line, but we're pleased with the outcome. It is a solid policy built on international best practice," Chritton says.

The policy

After 15 months of intensive work with Verité, in March 2015, CH2M's global worker welfare policy was signed off by CEO Jacqueline Hinman. The policy covers issues including fair worker recruitment and payment practices, as well as accommodation and living standards.

It is now in implementation phase.

"This is ultimately going to be a global policy, but we're initially focussing on the Middle East region because that's where we can make the biggest contribution," Chritton says.

What has changed?

For services CH2M is procuring for its own use, initial changes include a new screening process and prequalification questionnaire. At the beginning of every contract, suppliers' worker welfare policies are evaluated and verified. CH2M also regularly visits sites to ensure that worker accommodation is up to standard.

"We screen before engaging a supplier, and monitor during the work phase. Our contracts also contain termination clauses. We are demonstrating to our supply chain that we take this issue seriously," Chritton says.

CH2M's supply chain is mostly limited to services around construction sites such as drivers, cleaners or maintenance workers. But the consultant is committed to engaging with those who do directly employ construction labourers.

"In our wider role as a project consultant, the policy encourages us to share worker welfare best practices with clients and others in our industry," says Loar.

Training

CH2M is embarking on a major training programme to help employees engage with clients on human rights issues.

Worker welfare issues have been woven into existing training courses. Last year 19,000 employees took CH2M's online ethics programme, which included a segment on the new worker welfare policy.

"Introducing worker welfare into our standard training packages, rather than treating it as a standalone topic, is a good way of keeping this issue live within the company, and building into everything we do," Loar says.

More targeted in-depth training is being introduced for employees in influential roles such as procurement, health and safety and project management. A rolling training programme will ensure that employees update their knowledge and skills annually.

Next Steps

The task force now provides ongoing updates on the policy rollout to CH2M's board.

"Having board level input ensures that the company stays focused on continual improvement on this issue. Verité is continuing to work with us, helping us address the most pressing challenges," Loar says.

CH2M is engaging with other organisations and NGOs to encourage wider industry collaboration on worker welfare.

The company is also exploring new initiatives, including technology-driven ways of capturing feedback from workers on their living and working conditions via mobile phones.

Conclusions

The significant amount of time and effort that has gone into creating CH2M's policy illustrates just how complex this issue is for supply chains, particularly in the built environment sector.

But CH2M is actively sharing its knowledge and experience with other companies embarking on a similar journey.

“We have created models and frameworks that could be adapted to other industries,” Loar says. “We also realise that we can’t act alone. Collaboration is essential if we are to move forward as an industry.”

Key points:

- **Get support** from the top of the organisation – buy-in at CEO and COO is essential.
- **Engage an outside expert** and draw on multi-sector experience.
- Make sure that the policy is **deeply embedded within operations** rather than bolted on. Worker welfare must not become a box ticking exercise.
- **Training** should be a major part of educating employees and ensuring that best practice is upheld.
- A **culture of continual improvement** is essential for ensuring that the policy works well and continues to be upheld.
- Organisations cannot act alone – **industry collaboration is essential** for raising standards globally.

www.ch2m.com

“ Apart from the obvious ethical and moral considerations, we see that there is a strong business case for raising worker welfare standards, namely safer and more productive teams, better project out-turns for clients and suppliers alike, and reduced reputational risk.”

Don Ward, Chief Executive,
Constructing Excellence



THE CLIENT

Qatar Rail: raising welfare standards in the Gulf region

Qatar Rail (QR) was established in 2011 to design, develop and operate the country's rail network.

Three major networks are currently under construction: the Doha Metro; the Lusail Light Rail Transit (a tram network for the new city of Lusail) and the Long Distance Passenger and Freight Rail (LDPFR). The latter project will ultimately link cities to the north and west of Doha with the GCC rail system, an international rail network spanning six Gulf countries.

Qatar Rail construction programme is scheduled for completion by 2030, by which time all three networks will be integrated into one system.

As a client, QR directly employs more than 400 people, but more than 32,000 skilled and non-skilled workers are estimated to be employed by contractors and subcontractors across its wide-ranging programmes.

The starting point:

Worker welfare conditions have long been an issue in Gulf countries. From the point of its founding in 2011, QR took the opportunity to raise standards in the region, setting stricter criteria in work contracts.

QR has included new standards¹⁴ developed by the Qatar Foundation (QF) in its contracts. QF is a chartered, not-for-profit organisation that promotes sustainable economic development and has commissioned influential research on the welfare of migrant workers.¹⁵

The Approach

Accommodation: local labour law stipulated that each worker should be allocated a minimum of 4m² in accommodation space. The QR contract stipulated that each worker should have a minimum of 20m² of lot space.

To further avoid overcrowding, QR contracts stipulate that workers should be housed in no more than four to a room and has banned bunk beds.

“Old labour laws stipulate that one shower should be provided per fifty people. We specify one shower per four people,” says Stephen Lines, senior commercial manager for QR's Red Line South.

Examples of further requirements in QR contracts:

- All accommodation spaces must be air conditioned and all habitable spaces must have insect screens protecting windows and doors.
- Dining areas and food preparation areas must be of adequate size to accommodate up to 50% of residents at any time.
- Medical facilities and doctors and counselling rooms should be provided in accommodation units housing more than 500 people.
- Accommodation facilities should have natural light and ventilation areas equivalent to 20% of the floor area.

Transport: air conditioned transport must be provided to and from the workplace.

Worker welfare: contractors and subcontractors must facilitate the establishment of a workers' welfare committee, consisting of representatives of the employer and elected workers.

In addition, contractors or subcontractors must provide a quarterly report on their welfare strategies and carry out welfare audits at least every six months.

¹⁴ Qatar Foundation, *QF Mandatory Standards of Migrant Workers' Welfare for Contractors & Sub-Contractors*, April 2013

¹⁵ Research includes *Migrant Labour Recruitment to Qatar*, July 2014

How QR upholds accommodation standards

“Any subcontractor that wants to join our list has to go through an inspection process,” says Lines. “QR representatives will visit live projects that the contractors or subcontractors are working on and assess the accommodation, issuing improvement notices where necessary.”

“We recognise that contractors cannot change their facilities overnight, but if there has been no improvement within the stipulated two or three month period, those organisations will not be allowed to progress to our tender list.”

Once a contractor or subcontractor has started work, QR will continue to monitor conditions and will terminate contracts of those organisations who fail to meet the welfare criteria.

Safety: QR has introduced the internationally recognised safety initiative Incident and Injury Free (IIF) to all its projects. As well as setting strict standards for health and safety on site, the initiative encompasses welfare issues.

“Safety and welfare are treated in the same way,” says Lines. “The issues do not stop when workers leave the site every evening.”

Workers have a meeting every morning in which they are able to bring forward any issues without repercussions.

Recruitment and employment conditions

Unusually for the region, QR stipulates that 80% of its labour on its projects must be directly employed by the contractor or main subcontractor. As well as driving up quality of work, this shortens the supply chain, reducing the opportunities for corrupt middlemen to exploit vulnerable workers.

By Qatari law, all workers must be paid directly into bank accounts. “We have built this stipulation into our contracts to reinforce the message,” Lines says.

Recent changes to the law

A new law came into effect in September 2015 which addressed the issue of contractors or subcontractors delaying payment or failing to pay employees altogether. Employers must provide evidence of making electronic payments to each individual’s bank account. There are harsh penalties and employers that do not comply are denied new visas.

‘Fresh Eyes’ initiative

Although QF Standards prohibit the payment of recruitment fees by workers, this practice continues to be widespread across the region and is one of the most challenging issues for the industry to tackle.

This year, QR launched a new initiative - **Fresh Eyes** - with its project management consultant Jacobs International. Under the Fresh Eyes initiative, all levels of the site team, from senior management to office staff, are encouraged to go out on site. As well as checking for potential health and safety issues, they talk informally to individual workers. These regular interactions are aimed at building mutual trust over the longer term. In cases where QR becomes aware of recruitment fees or any other form of exploitation, the client will take immediate action against the perpetrators.

“I would urge all expatriate professionals visiting or working in the region to go to the sites and witness the situation themselves. It’s important for us all to become more proactive in looking for problems,” Lines adds.

Conclusion

QR’s introduction and policing of tougher and more explicit contracts is having a positive impact on the welfare of more than 32,000 workers. In addition, QR’s detailed vetting of accommodation standards before contractors and subcontractors are permitted to join tender lists is expected to drive up standards for other projects in the region over the longer term.

CEO of Qatar Rail, Dr Eng Saad Ahmed Al Muhannadi, says:

“At Qatar Rail we are committed to providing all those involved in the delivery of our landmark project with the highest health and safety standards. As part of this commitment we have made the necessary steps to ensure that Qatar Foundation Guidelines for Migrant Worker Welfare were written in to all contracts. As a responsible employer, we are in the process of implementing changes throughout our local supply chain.

“As with all change, the full effects take time to be realised but this is a long term approach and one we are dedicated to seeing through.”

Key points:

- QR’s Worker Welfare Policy is being led from the top of the organisation, with the active backing of the CEO.
- Local labour laws may not be sufficient – extra clauses may need to be written into contracts to ensure that worker rights are protected.
- Vetting must start before a contractor or subcontractor joins a tender list.
- Contracts and contractors must be actively monitored by client representatives.
- All levels of client and tier one organisations should support health and safety initiatives.
- An atmosphere of mutual trust must be built and maintained so that workers feel empowered to speak out on any issue.

The Qatar Foundation’s Mandatory Standards of Migrant Workers’ Welfare can be downloaded at: www.qf.org.qa/app/media/2379



GOODS AND MATERIALS

Whilst migrant workers are visible on construction sites and infrastructure projects, those that are producing goods and materials— from aggregates, timber, natural stone and metals, to manufactured goods such as heating parts or PPE equipment – are arguably even more hidden in the supply chain.

In quarries, recycling yards, smelting plants, factories and assembly lines, migrant and low skilled labourers can suffer the similar abuses as outlined in the previous chapter. In some sectors, particularly in the production of raw materials, the risk of human rights violations, such as the use of child labour or unsafe working conditions may be even higher than on construction sites.

A construction project comprises of thousands of components. Many units, such as cladding panels, could be a composite of many elements. The challenge for our sector is how we hold such a fragmented supply chain accountable.

As Professor Jacqueline Glass of Loughborough University's School of Civil and Building Engineering explains, industry schemes and standards, helpful as they are, are only scratching the surface.

"We need to broaden participation in standards relating to responsible sourcing. At present, products like PPE, IT equipment, mechanical and electrical components, signage or sealants are not really covered in standards such as ISO 14001 and BES 6001. These are all items that are essential to our sector but escape scrutiny on a regular basis."

“ One of the most important challenges that we face as an industry is how to cascade responsible procurement practices down supply chains. When unethical practices come to light, a tempting kneejerk reaction is to immediately strike the offending organisations from supplier lists. But this will only shift the problem elsewhere: unethical goods and services will always find a buyer with less stringent criteria. In order to build trust and develop genuinely transparent processes, supply chains need reassurance that they will be supported on the journey to ethical procurement, and that clients and tier one contractors will work with them to address the issues. It may feel frustratingly slow, but taking small steps now will make a bigger, more sustainable difference in the future. ”

Dr Mike de Silva, Sustainability Manager, Bechtel

WEAKNESSES IN THE PROCUREMENT CHAIN

Consider the following hypothetical scenario. A media organisation uncovers the story of cladding panels that have been manufactured in bonded labour conditions. The panels are to be used on a flagship project in a major European city. They are already arriving on site.

The story is picked up by the rest of the media and quickly turns into a major news event.

But aside from the manufacturer who has knowingly flouted international legislation, who should take responsibility for this unfortunate procurement decision? The choice is wide open, from client, consultant, architect, engineer, construction manager to specialist subcontractor.

In reality, any or all of the organisations could be to blame. This is typically due to fault lines in the procurement process, divisions within project teams and even communication gaps within individual organisations.

- Although sustainable policies may have been set out by the client from the outset, they may not be enforceable in contracts.
- On many projects, the design team is often working in isolation from the construction team. Unaware of procurement policies, they may not specify verified materials.
- Within the contractor, sustainable policies made at boardroom level may not have filtered down to the procurement team. Under pressure to reduce costs, and unaware of the issues, the procurement manager may unknowingly substitute unethically produced materials as part of a value engineering exercise.
- The site manager, fearful that the project will fall behind schedule, places an order with a new supplier, or switches suppliers to cut costs.
- Alternatively, all ethical purchasing decisions may be bypassed by corrupt suppliers that substitute a substandard product to make a bigger profit.

As the example demonstrates, weaknesses in every link of a supply chain can result in unethical purchasing decisions. Separated by several tiers of suppliers, most of the players this scenario would be oblivious to the impact of their decisions, and would no doubt be horrified to think that they were supporting modern slavery. The failure has to be addressed systemically.



CRACKS IN THE PROCUREMENT MODEL



“ There is often a big gap between boardroom decisions and what actually happens on a project. Getting specifications right at pre-construction stage, then ensuring purchasing policies are followed through on site, will dramatically reduce risk.

Organisations typically don't look beyond their first or second tier suppliers. As we move to greater transparency, industry collaboration will be essential – but small and medium sized companies have limited resources and will need support. For me that's part of the ethics around sourcing responsibly. ”

Professor Jacqueline Glass MCIQB,
Associate Dean for Enterprise, School of Civil and Building Engineering, Loughborough University

BUILDING THE FOUNDATIONS OF MORE ETHICAL PROCUREMENT

Whilst the whole of the supply chain should be held accountable for procurement decisions, strong leadership in the initial stages of a project can do much to mitigate risk in later months. When clients engage more closely with the issues, and contracts reflect these expectations, the direction is set.

Architects and engineers should not be working in isolation from the rest of the team, but be aware of procurement protocol from the beginning. And comprehensive training of contractors and subcontractors will help to ensure that policy is being understood throughout the supply chain. Regular auditing and visits will be necessary to ensure that suppliers are being held to account.

Within contractors and consultants, ethical procurement policy should not be a “nice to have” that is bolted on to a CSR report. It should be embedded in

departments, such as HR, legal, procurement, design, training and business development and be led by a senior member of the board.

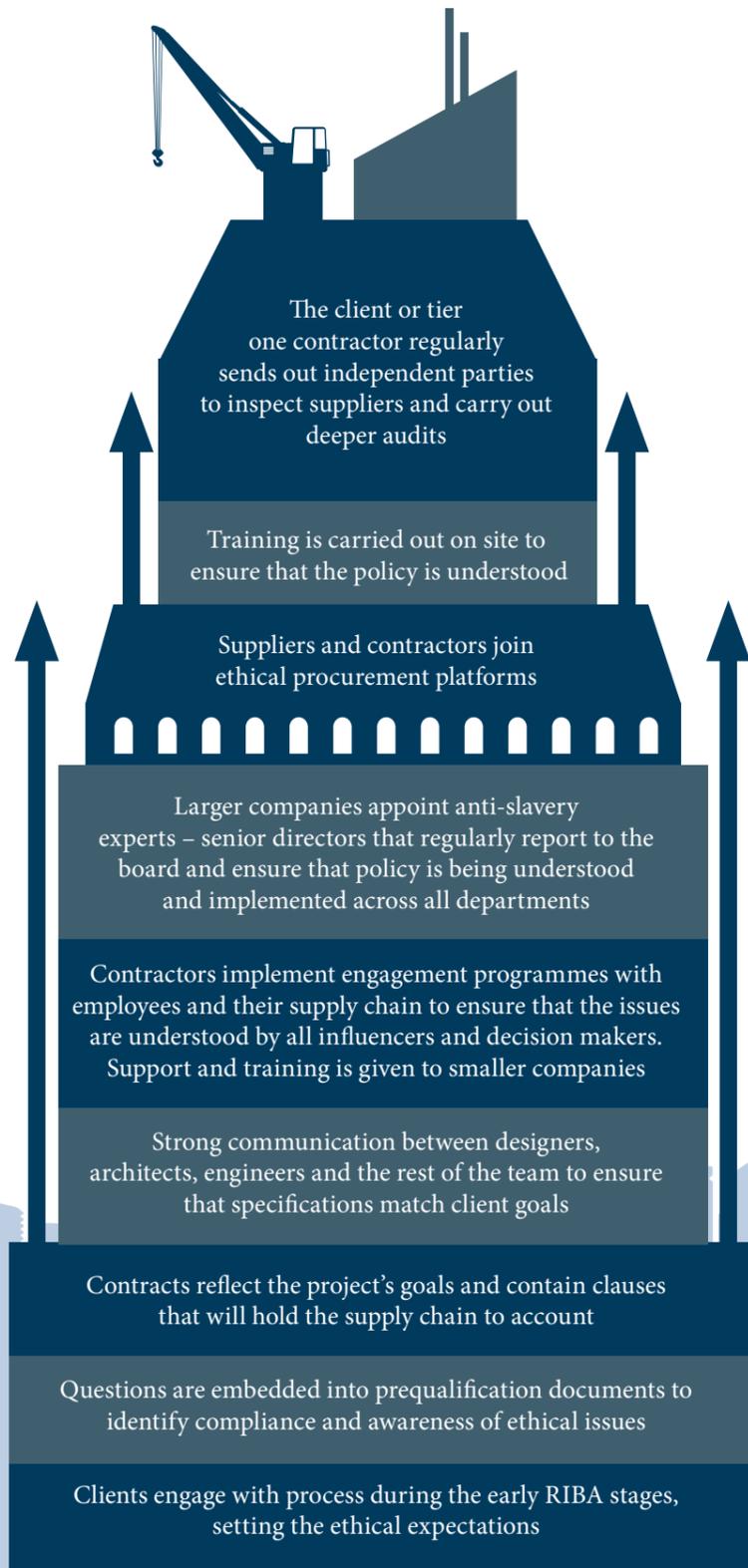
Once again, we are not suggesting that companies initiate exhaustive investigations of all products. This would be practically impossible. But starting with one potentially problematic area, or focusing on a particular product, can help build understanding for setting future policy.



“ Sectors that are more advanced in their development of ethical programmes have much to teach built environment practitioners. M&S has been carrying out ethical audits of its general merchandise and food supply chains for the past 12 years. We are now collaborating with colleagues from those departments to introduce more in-depth ethical audits for our fit out suppliers. ”

Lydia Hopton, Plan A Project Manager, Marks and Spencer

BUILDING STRONG PROCUREMENT FOUNDATIONS



“A few years ago, responsible sourcing and sustainable procurement were treated as two separate streams. There is now a growing realisation that responsible, ethical procurement is the major issue that we need to tackle.

We need to allow procurement professionals to make better decisions which will in turn create more demand and pull through in the supply chain. Recent legislation and industry focus on modern slavery has acted as a much needed catalyst which will bring a new level of transparency and traceability into procurement transactions; this has the potential not only to reduce risk for the clients and major contractors, but also an opportunity for smaller suppliers and sub-contractors to differentiate themselves”

Dr Shamir Ghumra,
Associate Director and Head of Responsible Sourcing, BRE



CASE STUDY 5

THE MATERIALS SUPPLIER

Marshalls: streamlining supply chains in quarrying and manufacturing to protect children and migrant workers

Established in the UK in the 1880's, Marshalls has been manufacturing and supplying hard landscaping products to the commercial, public and consumer retail sectors for more than a century. Supplying to 60 countries, Marshalls directly employs more than 2,500 people and has 50 operational sites in the UK and several offices around the world.

Marshalls became member of the Ethical Trading Initiative in 2005, signatory to the UN Global Compact in 2009 and entered the FTSE4Good Index in 2005.

The catalyst

Marshalls' natural stone products are now sourced from quarries and manufacturing plants from a narrow group of countries, most notably India, China and Vietnam.

In 2005 Marshalls group marketing director Chris Harrop visited suppliers in the Rajasthan state of western India. Keen to gain a better understanding of sandstone production, he did not explain the purpose of his visit, gaining access to a wide range of facilities.

Harrop was shocked at the levels of exploitation he witnessed. Children as young as six were working in the quarries and manufacturing plants. They were living in squalid conditions, and were regularly being exposed to high levels of noise, dust, vibration and dangerous activities.

With parents working, sick or injured, many children were labouring not only due to poverty, but because there was no one to care for them off site. They had no access to education.

Workers of all ages were at risk of exploitation and abuse, hunger and food insecurity, inadequate healthcare and contaminated water. These conditions were having a disproportionate impact upon children.

“What struck me was that this was so blatant,” Harrop says. “Locally it was seen as a normal and accepted practice.”

The challenges

It was clear that the causes and drivers of exploitation in the sector were complex and intertwined cultural and socio-economic factors.

As a foreign buyer, Marshalls also recognised that its influence was limited: exports account for only 5 per cent of the total Indian sandstone market.

“The scale of the challenge was immense. We realised that the only way forward was to bring in experts and to start working collaboratively,” Harrop says.

The approach

Unaware of any existing industry initiatives to tackle such problems, Marshalls sought out best practice in other sectors.

In 2005 it joined the Ethical Trading Initiative (ETI) - an international alliance of companies, trade unions and NGOs, originally founded by British retailers.

Marshalls adopted the ETI Base Code which is based on ILO principles and covers areas such as child and bonded labour, living wages, health and safety, discrimination and inhumane treatment.

“Joining ETI was particularly useful because it helped us understand root causes of child labour,” Harrop says. “It would have been easy to throw money at a small project and give children books and clothes, but the ETI process helped us dig deeper. It showed us the importance of consulting with local communities and NGOs before forming our strategy.”

“We discovered that lack of access to education was a major contributor to the problem, as were the very low wage levels, which meant that whole families had to work to survive.”

Marshalls engaged the services of business and human rights consultant Elaine Mitchel-Hill that same year.

The strategy

Until 2005, Marshalls had been working with several sandstone suppliers in Rajasthan. In order to drive change efficiently, the company decided to simplify procurement, forming an in-depth relationship with a single supplier.

“The partner that we chose – Stone Shippers India – was by no means the largest in the market,” Harrop says. “We selected them on the basis of shared values and a commitment to quality, showing that, by doing the right thing, we could grow our business together.”

He adds that a period of collaboration was necessary to build trust.

“We had to create a shared vision and understanding. Instead of asking our partner for outcomes through box-ticking exercises, we wanted to establish meaningful processes and lasting change.”

“For example, simply having the paperwork to check masks were being issued, and wages were being paid on time, was not enough. We had to educate people on why masks were essential safety equipment, and the impact of late wages.”

Marshalls introduced a range of activities to support the supplier and the wider community including:

- **Integrating systems.** Marshalls now shares a common ERP system with Stone Shippers.
- **Helping the supplier** establish a professionally run **human resources department.**
- **Forming a long term partnership** with local a NGO to deliver child education, health camps, workers rights education.
- **Raising awareness of social insurance** with workers. Marshalls collaborated with a local NGO on this project, providing seed funding for the scheme, which took off and became self-sustaining after three years.

Upholding

Marshalls uses third party organisation Just Solutions to check that the processes agreed with suppliers are in place and being upheld. Just Solutions was chosen because of its previous experience working with the ILO and its strong local connections.

“They’re forensically checking the processes and embedded behaviours,” Harrop says. “This is important because if you just send an auditor into a facility, they will only witness what is happening on one particular day. As well as conducting in-depth assessments, Just Solutions also train and educate, wherever they see the need.”

The launch of Fairstone brand and expansion to new regions

After launching Fairstone India, ‘the first ethically sourced sandstone range’ in 2009, Marshalls began to assess its supply chains in other source countries.

Although some trends were similar – inadequate wage levels being a common problem – major risks differed from region to region. In China, for example, the critical issues were not child labour, but health and safety and excessive working hours. Fake or fraudulent certification was also a major problem within the supply chain.

By contrast, prison labour was a problem in Vietnam, as bonded labour is widely used and even sanctioned by government.

“As the Vietnamese government has sanctioned a programme for using prison labour in heavy manufacturing and construction, we’ve had to do lots of detailed work with a very limited number of suppliers to help ensure that no prison labour is used in our supply chains,” Harrop says.

Since addressing supply chain issues in these regions, Marshalls has been able to expand the Fairstone brand to its Chinese and Vietnamese-sourced products.

Raising awareness with consumers

In 2007, Marshalls launched a campaign to highlight the issues of child labour and to help consumers make more informed product choices. This included the publication of a booklet *The Truth about Indian Sandstone*. This was followed up by another consumer publication *Behaving Ethically – Marshalls in India*.

Further work:

2009: UNGC

Marshalls signed up to the UN Global Compact (UNGC) in 2009. A mandatory part of becoming a UNGC signatory is undertaking and reporting human rights impact assessments annually.

Mitchel-Hill says: “One of the stimuli for joining the UNGC was that we were doing lots of activities, such as carbon reporting, work on water, carbon footprint, child labour and health and safety. The UNGC brought them together into one framework. It has given us a clear focus.”

Harrop chaired the UNGC Local Network UK between 2014 and 2016.

“Becoming a signatory has driven us to look not only within our own supply chains, but also to collaborate with other UNGC signatories and trade associations to look at wider industry issues,” he says.

2012: UNICEF and the Indian Government

Although Marshalls has been successful in eradicating child labour from its supply chain in Rajasthan, there are still an estimated 200,000 children working elsewhere in India’s stone quarry industry.

Committed, as a UNGC signatory, to addressing this wider problem, Marshalls engaged with UNICEF in 2012 in piloting UNICEF’s *Children’s Rights and Business Principles* assessment framework.

“We used that assessment process to look at our business in its entirety,” Mitchel -Hill says: “It enabled us to expand our focus beyond the issues of child labour. We started to see things from new perspectives, including how children’s rights and business principles interface with women’s empowerment principles.”

Marshalls engaged in a strategic partnership with UNICEF’s in 2014 which included funding research on child labour in Rajasthan. The findings will be used to engage the government, private sector and third sector and other stakeholders in adapting policies and creating a regulatory framework to eliminate child labour in the quarrying industry.

Ongoing work and next steps

More than a decade on from Harrop’s trip to Rajasthan, Marshalls continues to develop its ethical sourcing initiatives.

“We’re still on this journey and we will be for a very long time,” Harrop says.

This is reflected in the fact that human rights specialist Mitchel-Hill, who has advised the company as a consultant for ten years, has gone in house, becoming a Marshalls employee in 2015.

“The scope of work continues to expand throughout our operations, and we recognise the need to dig even deeper in our procurement and HR practices,” Mitchel-Hill says.

Recent and ongoing work includes:

- Becoming an accredited Living Wage Employer in the UK by the Living Wage Foundation.
- Becoming a Fair Tax Mark company for their 2014 financial year and recertified for 2015/16.
- A project to establish a living wage benchmark for the Indian supply chain, using Living Wage Foundation and preferred Oxfam methodologies.
- The launch of *Marshalls Certificate of Sustainability* in 2016. This online training programme, certified by UNGC Local Network UK, harnesses the core values of leadership, excellence, trust and sustainability to address the UNGC principles of human rights, labour rights, environment and anti-corruption.
- A *Modern Slavery Awareness* programme rolled out across all UK operations in 2016.
- An ongoing commitment to report annually to the UNGC.¹⁶

Widening the lens on procurement:

“The next step is to look beyond our immediate building materials supply chains, into areas where our sphere of influence is more limited, for example, office equipment, workwear, services that we contract in. This potentially presents even greater challenges and will require wider cross sector collaboration,” Harrop says.

¹⁶ See Marshalls Communications on Progress (COP) Report 2015



CASE STUDY 6

Conclusion:

What started as the goal of tackling child labour in one region has created a momentum that is informing and shaping all activities at Marshalls. The ripples are spreading outside the company and its immediate partners and into communities.

Ten years on sustainability is central to business strategy, but Harrop urges against complacency.

“Even today, I can’t guarantee 100 per cent that activity in any part of that supply chain is free of exploitation because there are so many variables. We have to constantly check that our processes are in place and working.”

By following international humanitarian guidelines, such as those set down by the ETI or UNGC, Marshalls is not allowing local laws to become the default setting for treatment of workers. This is evidenced by its refusal to use prison labour in Vietnam, and its initiative to establish a living wage, as opposed to government-approved minimum wages in developing countries.

As Marshalls has shown, endemic exploitation issues are often better tackled by forming in-depth relationships with a limited number of partners. But as Harrop readily acknowledges, far wider collaboration is necessary if a real and lasting impact can be made in the sector.

“We need the rest of the industry to formalise and develop its ethics and supply chain behaviours,” he comments. “Procurement needs to change. I still regularly talk to contractors that are aware of some of the issues in developing countries, but only want to go for cheapest price products.”

“However, we are noticing a change of attitude, driven in part by the Modern Slavery Act. Consumers are also becoming more aware of ethical issues, and are asking more questions of retailers. We anticipate that consumer pressure will help to drive the agenda in the future.”

In summary:

- Consult with local communities and NGOs before forming your strategy. It is important to understand what their needs are.
- Work with third party organisations that have strong local knowledge and cultural understanding.
- To gain a better understanding of the issues, form in-depth relationships with limited numbers of suppliers.
- When driving behavioural change, education is essential.
- Resist tick box exercises – go beyond auditing to uncover the realities of your supply chain.
- Beware of audit fraud.
- Integrate systems – such as ERP systems with your supplier.
- Understand that the root causes of exploitation could change from region to region – a ‘one size fits all’ strategy may not be appropriate.
- Don’t just accept local laws and cultural norms – clear vision and leadership is for signalling that organisations need to do more than follow statutory requirements.
- Funding research and initiating wider collaboration with NGOs can be a powerful means for influencing at government level.
- Once established, good practice must rigorously monitored and checked, ideally by third parties.

www.marshalls.co.uk/publications

THE CONTRACTOR

Bechtel: a new bottom-up approach to ethical procurement

Most companies concern themselves principally with the first or second tier suppliers. Bechtel turned this principle on its head recently with an innovative experiment that took it to the furthest reaches of its supply chain, as Dr Mike de Silva explains:

“We tend to take a top-down approach when considering the procurement of construction products. As a result, raw materials producers such as metal mining companies are so far down the supply chain that they can escape scrutiny.

However, products such as mechanical and electrical equipment are heavily reliant on metals-based components. With this in mind, we decided to try an experiment, writing to major mining companies and asking them to report on conditions in their sites and plants. The first responses were largely reluctant. For example, on our Crossrail project, the mining companies did not recognise our client as a customer. But we have slowly begun to build a dialogue.

Our next step is to move one tier up, contacting the processing companies with similar questions. In this way we are engaging with the supply chain from the bottom up, and will continue to move up the supplier ladder.

We’d like to encourage other leading contractors, clients and consultants to do the same. We believe that collective engagement will ultimately raise awareness and make a positive difference to those labourers that are most hidden.”

“CIOB core values are built on ethical business practice and treating people with respect and dignity. We expect our members to exert a positive influence, helping to protect human rights, wherever they are working in the world.”

Chris Blythe,
Chief Executive, CIOB

NEW ETHICAL LABOUR SOURCING STANDARD

Previous sustainability standards have tended to focus more on environmental rather than social issues. BRE is redressing the balance with the launch of a standard that places more weight on ethical considerations.

BRE's Ethical Labour Sourcing Standard is practically focused and has been developed by an industry stakeholder group of more than 100 people. Collaboration and development has been led by Nigel McKay, former procurement director at HS2 and Lend Lease.

The standard can be applied to any product or service, and can be tailored to fit both large and small organisations. It is designed to help companies take a more holistic view of their operations, assessing nine areas:

- Company structure.
- Management Systems and Certifications.
- Assurance, Compliance, and Auditing.
- HR Practices.
- Immigration.
- Procurement.
- Learning and Development.
- Forums, Committees and Best Practice.
- Reporting.

"Many organisations are already doing work in this space. The standard will help them identify areas of weakness and will support improvement, as companies move towards best in class certification.

"Our aim is to help organisations de-risk their operations, empowering them to report on their activities in more detail under Modern Slavery Act UK requirements," says Dr Shamir Ghumra, Associate Director and Head of Responsible Sourcing, BRE.

Having gone through a pilot phase, a beta version of the standard was published in the summer of 2016. More pilot projects will follow and BES 6001 3.1 will be launched by the end of the year.

BRE is also carrying out a parallel consultation on the revision of its Framework Standard for Responsible Sourcing BES 6001, first published in 2008. The new version will include a larger section for ethical assessment.

See www.bre.co.uk/ethicallaboursourcing for more details.

“Contractors no longer see sustainability merely just as an environmental issue. In the last 12 to 18 months we've noticed a shift of focus towards social responsibility, labour standards and ethics. This has no doubt been powered by the Modern Slavery Act, as well as greater public awareness of human rights abuses.

What is striking is a greater willingness for supply chains to collaborate. There is a growing acceptance of the need to share knowledge, not only with immediate partners, but across different supply chains as well.”

Helen Carter, Sustainable Procurement Consultant, Supply Chain School

ETHICAL PROCUREMENT: GETTING STARTED

Company level initiatives

- **Identify** the areas and regions of **highest risk** to tackle first.
- **Do not try to do everything at once.** Selecting and investigating just one material route will teach you a lot about your supply chain.
- Develop a **company-wide policy** that is led from the boardroom.
- Identify all **employees** that will be affected by the policy and introduce training.
- **Engage with your supply chain** to ensure that they understand the issues.
- **Do not forget the SMEs;** they will need support and engagement.
- Seek out new **ethically-based standards.**
- Use innovative **software tools** and cloud-based platforms to bring more transparency to the procurement process.

Recommendations for industry

- **Sharing information** with peers can speed up the uptake of best practice. Industry and academic groups such as the Action Programme on Responsible Sourcing (APRES) or the Supply Chain School can be supportive.
- **Support and pilot** the development of ethically-based standards.
- **Engage with raw materials suppliers** at the furthest reaches of the supply chain. Collective action can make a difference.

“A study by PwC and MIT in 2013 showed that globally only a third of companies were actively seeking transparency below tier one of their supply chain, at scale.

But the greatest and most critical risk of non-compliance is found many tiers down the supply chain, and it is often with goods and services that are out of a client's direct control.

Sector-wide collaboration, pooling knowledge of the lower tiers of a supply chain can help organisations better understand and manage the risks both to their operations and reputations.”

Dan Murray,
Director of Marketing and Client Development, Sedex

FINAL THOUGHTS

“Cross-industry collaboration is essential if we are to make a difference. Consultants and contractors will have little long term impact if they act alone.”

Theresa Loar, Senior Vice President, International Government Affairs, CH2M

Our industry is at the start of a very long and complex journey, but we must not lose sight of our end goal: that all workers are treated equally, with respect and dignity.

There is no point in pretending that the issues will go away. As legislation begins to take effect, the pressure will increase. New channels and social media campaigns will make or break reputations. Stakeholders and investors will start raising uncomfortable questions. And let's not forget employees themselves: no one feels good about working for an organisation that is not protecting human rights.

In this brave new world, actively looking for trouble is a wiser long term strategy than pretending that problems don't exist at all. Your shareholders will thank you for it.

Some companies are already taking steps to develop best practice, but they cannot act alone. The sector needs to come together, to collaborate, to talk to clients and to set new standards and protocols if it is to shift behaviours and mindsets.

Business models will be forced to change, possibly with the engagement of more direct labour. Lowest cost tendering should also be viewed with caution, as it heightens the risk to those at the bottom of the supply chain.

Organisations will need to become proactive, holding subcontractors and suppliers to account through more stringent clauses and penalties. And the eradication of illegal recruitment fees must be our collective priority.

One of the most important lessons that we have taken from our research is that worker welfare initiatives

must be at the heart of operations. They cannot be simply bolted on to company policy, like a CSR report. And there is no point in introducing a parallel auditing regime: bureaucracy fatigue is the death knell of any new initiative.

Luckily, help is at hand. A number of specialist consultancies and NGOs are available to offer their expertise. We can also learn from organisations in other sectors.

As part of CIOB's ongoing engagement, we are introducing modules on human rights as part of our route to chartership. We are also introducing CPD training for existing corporate members.

We also anticipate that new technology including electronic recruitment systems, cloud-based procurement models and innovative worker feedback applications, could play an increasingly important role in worker welfare in the future.

The challenge is daunting, but the possibilities will reshape our industry in exciting new ways. We hope that you will continue to engage with us and other industry groups to help us move this issue up the corporate agenda.

Chris Blythe, Chief Executive CIOB

Read on to see details about organisations that can support you on your journey:

HELPFUL ORGANISATIONS, WEBSITES AND RESOURCES

The following section contains details of organisations that have helped with research on this document. Although it is not a definitive listing, it is intended to be useful starting point for assistance and advice.

Amnesty International

The NGO carries out wide-ranging research, campaigns, and works directly with organisations, governments and industry bodies to raise human rights issues around the world.

www.amnesty.org

Action Programme for Responsible Sourcing (APRES)

APRES is a group of industry and academic partners committed to embedding responsible sourcing in the construction industry. Led by Professor Jacqueline Glass of Loughborough University's School of Civil and Building Engineering, APRES is free to join and produces regular newsletters. New associate members are welcome. APRES is hosted by BRE.

The group is involved in a range of initiatives. Last year APRES produced a UK Manifesto for Ethical Sourcing in Construction, the result of an industry hackathon. It also published guidance for designers AESOP: Ethical Sourcing: A Designer's Guide for property and construction. Both publications were funded by Loughborough University and the Engineering and Physical Sciences Research Council (EPSRC).

www.apres.bre.co.uk

Action Sustainability

Action Sustainability is a global consultant, software developer and service provider in sustainable supply chain management and sustainable procurement. AS works with a variety of industry sectors to develop knowledge and competence, as well helping to improve capacity of supply chains.

Services include training, consultancy and advice on best practice. AS also measures the sustainability performance of supply chains and assesses procurement performance against BS8903, the British Standard for Sustainable Procurement, and the forthcoming international standard ISO20400.

www.actionsustainability.com

BRE

BRE is a multi-disciplinary building science centre, harnessing cutting edge research to develop products, standards, services and qualifications that are used around the world to bring about positive change.

BRE's Sustainable Products division has been at the forefront of responsible sourcing since 2008. Having originally developed the Framework Standard for Responsible Sourcing (BES 6001), BRE launched a new Ethical Labour Sourcing standard in July 2016.

www.greenbooklive.com

www.bre.co.uk/ethicallaboursourcing

Constructing Excellence

Constructing Excellence is a not-for-profit think tank and best practice organisation whose core values include collaboration, supply chain integration and respect for people. CE works with intelligent clients, leading contractors, consultants, suppliers, universities and other stakeholders on a range of activities including benchmarking and research, demonstration projects and knowledge transfer.

Based in the UK, CE also has strategic alliances in ten other territories including Hong Kong, Australia, New Zealand, Norway and Singapore.

Recent additions to the CE family are Constructing Excellence in Qatar and in UAE, both established in 2015 through a collaborative joint venture with BRE. The goal is to help local organisations improve their processes across a range of areas, including briefing, procurement, employment, productivity, value and legacy. Constructing Excellence is currently discussing potential demonstration projects with key stakeholders in the Gulf region on which it can benchmark worker welfare standards against productivity rates and overall project performance and outcomes.

A range of toolkits supporting the Respect for People initiative can be downloaded from the Constructing Excellence website's resources section.

www.constructingexcellence.org.uk/resources

www.constructingexcellence.qa

Ethical Innovations

Ethical Innovations (EI) is a new not-for-profit think tank focussed on addressing the problems of human trafficking and forced labour in supply chains.

Working closely with clients, the public and policy makers, the organisation's mission is to develop a range of innovative tech-driven products and toolkits to help clients move from legal compliance into market-leading best practice.

EI will also be carrying out original academic research to demonstrate the link between ethical business practices and enhanced profitability.

www.ethicalinnovations.ch

Ethical Trading Initiative

Ethical Trading Initiative (ETI) is an international alliance of companies, trade unions and NGOs that lobbies governments and helps organisations build more ethical and resilient supply chains. Founded by a group of British retailers in 1998, ETI's membership has grown to include major retail and manufacturing organisations in Europe and the USA. Its work impacts on more than 10 million workers annually.

Members adopt the ETI Base Code. Training programmes, best practice examples and other resources can be found on the website.

www.ethicaltrade.org

FSI Worldwide

Workforce specialist FSI Worldwide was founded to bring international best practice to the recruitment and management of migrant workers from the developing world.

The company owns and manages its recruitment infrastructure in several major labour source countries and works across a range of sectors including construction, oil and gas, facilities maintenance and security.

FSI's consultancy arm offers a range of services including labour supply chain auditing, labour dispute resolution and HR administration. The company also provides training on labour related issues including Trafficking in Persons awareness and compliance, in addition to courses on managing diverse workforces.

www.fsi-worldwide.com

Global Business Initiative on Human Rights

Global Business Initiative on Human Rights (GBI) is a not-for-profit organisation that works in collaboration with the UN Global Compact Office. It is led by a core group of 18 global corporations from different industries, headquartered in diverse countries.

GBI's vision is that all corporations in all parts of the world respect the dignity and rights of the people they impact and interact with. Its mission is to advance human rights in a business context through cross-industry peer learning, outreach, capacity building and informing policy.

Member organisations have a combined workforce of approximately 1.9 million employees, with millions of direct suppliers and business partners located in more than 190 countries.

www.global-business-initiative.org

The Home Office

Useful background information, advice, videos and contact details are provided on the UK Government's modern slavery website.

For reporting abuse in the UK, the modern slavery helpline is: 0800 0121 700.

www.modernslavery.co.uk

Institute for Human Rights and Business

The Institute for Human Rights and Business (IHRB) is a global centre of excellence and expertise (a think and do tank) on the relationship between business and internationally recognised human rights standards.

IHRB works with government, business and civil society to embed international business and human rights standards within responsible business practice. The Institute provides a range of training packages suitable for companies of all sectors.

The Institute recently launched the Dhaka Principles for Migration with Dignity a set of principles for protecting migrant workers from the moment of recruitment to their return to their home country. IHRB also convenes the Leadership Group for Responsible Recruitment.

www.dhaka-principles.org

www.ihrb.org

Sedex

Sedex is a global non-profit membership organisation and home to the world's largest web-based collaborative platform for managing and sharing ethical supply chain data. It helps organisations analyse, rate and manage risk in their supply chains.

The platform has a natural cascade effect: as companies join, they report on suppliers on the tiers below them, encouraging them to sign up in turn. This has the effect of opening up many tiers of a supply chain at low cost.

One of the benefits of using Sedex is that it reduces audit fatigue: suppliers only have to upload information once, but it can then be shared multiple times with any client.

Launched in 2004, Sedex has more than 750 major clients as members. More than 37,000 suppliers have signed up to Sedex across 150 countries.

Sedex does not set policy or carry out audits, but it is helping drive transparency across more than 30 sectors including retail, fast moving consumer goods, oil and gas, finance and aviation.

www.sedexglobal.com

Staff Wanted Initiative

This is campaign to protect worker rights in the hospitality industry is a joint initiative by the Institute for Human Rights and Business and Anti-Slavery International and contains some useful resources that could be adapted to other sectors.

www.staff-wanted.org

Stop the Traffik

The international NGO is represented in more than 60 countries, working with communities as well as local and national businesses to fight human trafficking. Recent initiatives include a mobile phone app to enable grassroots reporting and intelligence gathering of suspected human rights violations.

www.stopthetraffik.org

Stronger Together Campaign

Stronger Together is a multi-stakeholder initiative aimed at reducing slavery, forced labour and trafficking of workers. It provides a range of learning materials, videos and training packages. Bespoke on-site training is available and workshops are run regularly.

It was developed in the UK by the Association of Labour Providers, the Gangmasters Licensing Authority and Migrant Help and supported by a number of leading retailers and other organisations.

www.stronger2gether.org

Supply Chain Sustainability School

Launched in 2012 by Action Sustainability, CITB, Responsible Solutions and nine founding partners, the School provides free practical support in the form of e-learning modules, tailored self-assessment and action plans, sustainability training and networking opportunities.

The School now has 13,000 individual members and 44 partner organisations including contractors, FM service providers, clients, suppliers and trade bodies.

Membership is free. On registering, members take a web-based self-assessment that identifies areas of highest risk and provides a ten point action plan. They are then guided towards the most appropriate e-learning modules

for their organisation. Advice is tailored for specific sectors, including construction, facilities management, residential, offsite and infrastructure.

In 2016, the School published a suite of documents applicable to the Modern Slavery Act including suggestions for best practice reporting and procurement guidelines. The organisation is also running regular workshops and training sessions and is releasing a series of short educational videos suitable for toolbox talks.

For more information, email rosie@supplychainschool.co.uk or call 020 7697 1977

www.supplychainschool.co.uk

UN Global Compact Networks

Launched in 2000 by the then secretary-general of the United Nations Kofi Annan, the UN Global Compact has become the world's largest corporate sustainability initiative with more than 10,000 members.

The Global Compact provides a framework of ten principles in four different categories – human rights, labour standards, the environment and anti-corruption – within which companies are invited to manage their operations.

There are more than 70 Local UNGC Networks around the world, providing practical support and advice to UNGC signatories.

The UNGC Network UK has around 300 members and offers a programme of meetings, training and seminars. It also runs a special working group on modern slavery.

www.unglobalcompact.org

www.globalcompact.org.uk

Verité

Verité is a global thought and practice leader on human trafficking and child labour. Its vision is to ensure that people around the world work under safe, fair, and legal conditions.

The not-for-profit NGO provides consulting, training, research and assessment services, working directly with corporations to develop worker welfare policies, investigate weaknesses in supply chains, identify solutions and roll out improvements. At macro level, Verité also works with industry groups, developing performance standards and helping to improve common business processes such as procurement and hiring. Verité also advocates for public policy change on labour issues.

Verité has worked with a number of global clients including HP, CH2M and Apple. Based in the US, the organisation also has regional offices or long-term network partners in China, Southeast Asia, Europe, South America, India, and Bangladesh.

www.verite.org

VisiChain

VisiChain is a new cloud-based system developed specifically for the built environment sector on the basis of experience gained within the retail garment industry. Tracking procurement transactions in real time, VisiChain enables organisations to check whether materials are being provided from approved sources. The software does not replace existing procurement systems, but runs alongside them.

Launched in late 2015, VisiChain was developed by ethical consultancy Responsible Solutions and software specialist Segura Systems in consultation with Loughborough University's APRES group.

www.visi-chain.com

LEGISLATION, STANDARDS AND PROTOCOLS

The UK Modern Slavery Act: implications for the UK and multinationals

This act came into force in October 2015.

This is groundbreaking legislation which will ripple out of the UK into global supply chains:

- Any company that has annual gross worldwide revenue of £36 million or more and trades in the UK must publish an annual statement on actions they have taken to ensure that its operations and supply chain are free from slavery and human trafficking.
- It also applies to any subsidiaries that have revenues of £36 million or more. It's possible that a parent company and its subsidiaries may each be required to produce a statement, if they meet the threshold requirements.
- The report page must be iterative – it must be updated every year.
- While a company will be complying with the law if it states that no steps have been taken, the Modern Slavery Act is expected to nudge organisations to become more proactive.
- The Act should be seen in context of the EU Non Financial Reporting Directive.

The International Labour Organisation (ILO)

In 2014, the ILO adopted a legally binding protocol to its Forced Labour Convention of 1930.

The new protocol brings the existing ILO Convention 29 on Forced Labour into the modern era to address practices such as human trafficking.

Strengthening the international legal framework the new protocol creates new obligations to prevent forced labour, to protect victims and to provide access to remedy, including compensation for material and physical harm.

It requires governments to take measures to better protect workers, in particular migrant labourers, from fraudulent and abusive recruitment practices and emphasises the role of employers and workers in the fight against forced labour.

The ILO has also published technical guidance on implementing the protocol.

www.ilo.org/global/topics/forced-labour

UN Sustainable Development Goals: Agenda 2030

In September 2015, all 193 Member States of the United Nations adopted a plan for achieving a better future for all – laying out a path over the next 15 years to end extreme poverty, fight inequality and injustice and protect the planet. The Sustainable Development Goals (SDGs) came into force in January 2016.

www.unglobalcompact.org

Dhaka Principles

The Dhaka Principles for Migration with Dignity are a set of human rights based principles to enhance respect for the rights of migrant workers from the moment of recruitment, during employment and through to further employment or safe return. They were developed by a multi stakeholder group in consultation with the Institute for Human Rights and Business.

www.dhaka-principles.org

FURTHER READING

Dr Ray Jureidini, *Qatar Foundation, Migrant Labour Recruitment to Qatar*, July 2014

Verité, *An Exploratory Study on the Role of Corruption in International Labor Migration*, January 2016

Amnesty International, *The Ugly Side of the Beautiful Game: Exploitation of Migrant Workers on a Qatar 2022 World Cup Site*, March 2016

Chartered Institute of Procurement and Supply & Verité, *Tackling Modern Slavery in Supply Chains: A Guide 1.0*, September 2014

UK Government, *Transparency in Supply Chains etc. A practical guide*, October 2015

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The Chartered Institute of Building,
1 Arlington Square,
Downshire Way,
Bracknell,
RG12 1WA, UK
Tel: +44 (0) 1344 630700

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