



Participant Workbook

MODULE 5: Remediating child labor and forced labor

MODULE 5: Remediating child labor and forced labor		Time in minutes
1.1. Remediation Strategy		
1	What is remedy and remediation?	25
2	How can we repair the damage?	40
3	Who does what?	35
4	How can we prevent it from happening again?	40
5	What causes do we address?	40
6	Who should cover the costs of the remediation?	30
7	Can my company's purchasing practices have an impact on child labor and forced labor?	25
1.2. Child Labor Remediation		
8	What principles should a child labor remediation strategy ensure?	30
9	What do we do when we find a child?	25
10	What systematic solutions can address child labor?	30
1.3. Forced Labor Remediation		
11	What actions can a farmer put in place to prevent forced labor?	45
12	What could we do in this case?	60
13	What systematic approach would address forced labor?	60
14	Who can be implementing partners?	20
15	What do you see your company doing?	25

1.1 REMEDIATION STRATEGY

1. What do we mean by remediation?

What is the difference between a remedial action and a systematic action?

How do we know what might be the best remedial action?

If we can't repair the damage, what do we do?

Should we compensate for harm?

What is the best way to reduce the likelihood of harm recurring?

2. How can we repair the damage?

Please take a moment to place these steps in a remedial action in chronological order.

- Determine the type and level of response.
- Follow up and review.
- Identify the situation/harm.
- Close the case.
- Implement the plan.
- Capture lessons learned.
- Assess the needs of the individuals affected.
- Design a case plan to reinstate the right, repair the damage and/or compensate individuals.

What do we mean by reinstating rights, repairing damage or compensating for harm?

What should we do in each of these steps?

Are there other steps that could be important when implementing a remedial action to repair harm?

3. Who does what?

Take the following RACI grid and assign possible roles and responsibilities to the different actors who may participate in the remedial process.

STEPS	BRAND	SUPPLIER	AFFECTED PERSON	UNION	FLA	OTHERS
Identify the situation/harm.						
Assess the needs of the individuals affected.						
Determine the type and level of response.						
Design a case plan to reinstate the right, repair the damage and/or compensate individuals.						
Implement the plan.						
Follow up and review.						
Close the case.						
Capture lessons learned.						

The different roles that can be assigned are the following:

R= Responsible A= Accountable C= Consulted I= Informed

- Responsible: Those who do the work to complete the task.
- Accountable: The person ultimately answerable for the correct and thorough completion of the deliverable or task; the person who ensures the prerequisites of the task are met and who delegates the work to those responsible.
- Consulted: Those whose opinions are sought.
- Informed: Those who are kept up-to-date on progress (often only to completion of the task).

4. How can we prevent it from happening again?

Read the case below. As a group, identify root causes of child labor.

Mandy lives in Dreamland village. Mandy lives her parents and two brothers. She lives in a farm that is about three hectares (ha), like most in the area. Each farm produces about 300 kilograms (kg) of beans per 1 hectare per year. One kg of beans is paid CFA 1,000 (around USD 2). The farm's income per year is about CFA 900,000 (around USD 1,800). From this money, the family pays the workers (1 per ha) and spends for farm maintenance. Any remaining money pays for the family's basic needs, including scholarship and health for all the family members.

Mandy's dad is usually makes the decisions concerning the farm. He decides how to spend the money and often does not show management awareness.

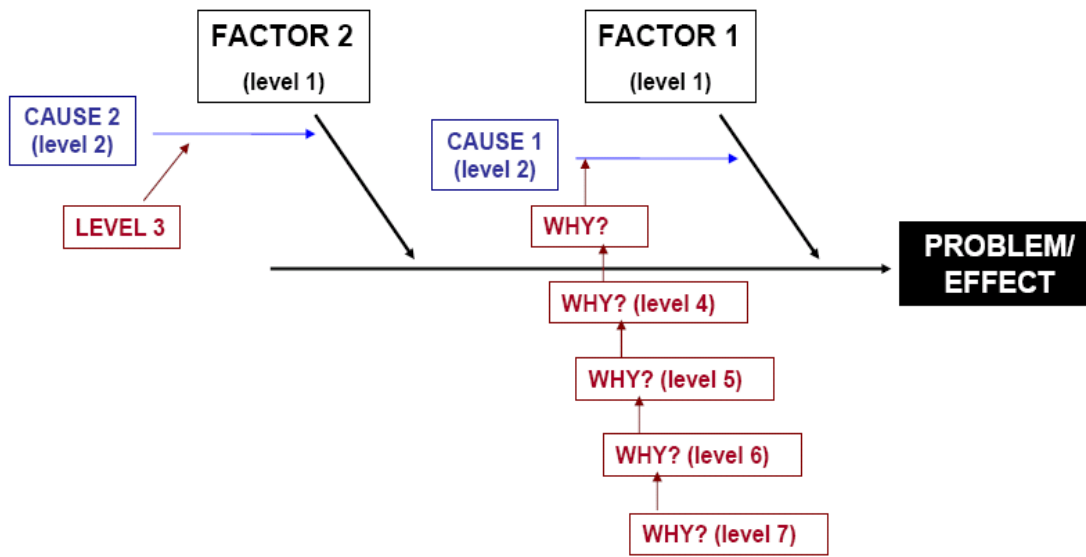
Maintenance is accomplished using rudimentary tools; consequently, the farm needs manpower to conduct necessary production tasks. Mandy's brothers do not want to live in Dreamland for much longer; neither do the rest of the young people in the town. They want jobs that are more remunerative. But there is a great labor shortage and all three help out on the farm.

Despite public and private investment over recent years to build schools in rural and remote areas, many localities still lack good schools or cannot accommodate all the children of age to attend. Many of the schools built by the private sector are limited to three grades.

In the towns, young people lucky enough to obtain higher education are nevertheless unemployed: education doesn't always translate to success. For this reason, parents are not motivated to send their children to school.

Last year, Mandy's neighbors lost their farm. They had no social insurance or savings or additional resources to support their children's scholarships. Mandy worries that this happens to her, too. She doesn't know it, but her parents don't have social insurance either (there is none available for the farmers), so in the case of an unfortunate event (loss of their farm due to fire, illness or death of the farmer, crop disease) her family would be put in a precarious situation.

Root Cause Analysis may help the group discussion. Use this illustration to draw a fish bone diagram.



5. What causes do we address?

Of the causes identified in the previous case study, which ones would you address?

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____

What recommendations would you make to address each causes?

	Cause	Recommendation
1		
2		
3		
4		
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6. Who should cover the costs of remediation?

Think of advantages and disadvantages of each of the following statements about the costs of remediation.

Brand should cover 100 percent of remediation costs.

Advantages

Disadvantages

Supplier should cover 100 percent of remediation costs.

Advantages

Disadvantages

Brand and supplier should share remediation costs.

Advantages

Disadvantages

Agents should contribute to remediation costs.

Advantages

Disadvantages

The government or national institutions should contribute to remediation costs.

Advantages

Disadvantages

7. Can my company's purchasing practices impact child labor and forced labor?

Which purchasing practices can have negative impacts on working conditions, specifically on child labor and on forced labor?

What might companies do to avoid these situations?

How can employees responsible for CSR or human rights issues and those responsible for purchasing practices better coordinate?

1.2 CHILD LABOR REMEDIATION

8. What principles should a child labor remediation strategy ensure?

What do each of these three principles mean?

Read the following case study and answer the questions that follow.

During an orchard visit, you see a girl who appears to be 7 or 8 years old with her mother. Her mother is from Syria, and she speaks Turkish. They are under the government protection scheme so the mother may legally work in agriculture. The mother tells you that her child is not working; she is just helping her. When you look carefully, you realize that there is no basket in front of the child and she has a book in her pocket. You would like to interview the child, but her Turkish is poor, but she has a concerned look. You recommend to the mother that she send the girl to summer school. The mother tells you that she registered her at primary school when they first arrived in Turkey. However, the girl hated the school because the other students were making fun of her Turkish, so she doesn't want to leave her mother.

Do you think sending the child to summer school would be in her best interest?

Would you try to persuade the mother to send her child to summer school?

How would you include the child to decision-making process?

9. What do we do when we find a child?

Read the following case study and discuss with your group a possible solution for their company.

You are an agronomist working for a big cocoa distributor. You have recently been assigned additional roles. Traditionally you visited the farms you source once a year, providing them with support and controlling the quality of the product. Now your company is committed to reducing child labor in its supply chain, and you are asked to participate in the monitoring and remediation efforts. Your company has not yet set up a procedure to address specific child labor cases, so it will be based on your experience and the experiences of your colleagues in other regions with similar responsibilities.

You visit one of your farms, and you find the following:

Jason is 14 years old. He doesn't go to school; he helps in the family farm. Jason usually takes on the more laborious tasks, like carrying the heavy loads. He is happy to do it, not only because he helps his family out, but also because of it is practical and useful training for him as a future farmer. His parents also learned from their elders.

You visit another farm, and you find the following:

Before or after school, Ana and Sara, who are 10 and 12, fetch the water and the wood for the farm; they also feed animals and do other tasks to help. In the mornings they have to walk several kilometers to school, which is overcrowded and has scarce resources. The family doesn't have access to electricity on the farm, so it's hard for the girls to study in the evenings.

Based on these experiences, suggest to your boss what you should do, and what your company should do.

10. What systematic solutions address child labor?

Read the following child labor remediation initiatives and answer the questions.

CASE 1: Child Labor Free Zones¹ (CLFZ) promote an area-based approach to addressing child labor issues in the communities and embed access to quality education as a key feature for children in poor farming communities.²

Child labor free zones (CLFZ) can be established by using an area-based approach that focuses on geographical areas, such as a community, plantation, etc., where many children are engaged in labor. This approach was first implemented in India by the MV Foundation; they created the child labor free zone approach by empowering stakeholders such as community leaders, school administrators, religious leaders, and employers to change the prevailing mindset of children being extra laborers for farms. MVF's efforts led to more than a million children leaving the labor force and enrolling in school. The Stop Child Labor Coalition³ has been promoting the CLFZ approach since 2003 and, together with local partner organizations, implemented several programs in India, as well as in several countries in Africa and Central America establishing CLFZ.

Leveraging the lessons learned from MVF's experience in India, FLA, and Hivos (coordinator of the SCL coalition) will create a standard approach that can be adapted and replicated in Côte d'Ivoire. The area-based approach and the Child Labor Free Zones were discussed as the most effective and successful way to combat child labor in Africa in the 2013 Kampala Declaration.⁴ A recent evaluation of the "Out of Work Program" of Stop Child Labor brings forward that the Child Labor Free Zone approach is not only leading to reduction of child labor and increased school attendance but also of reduction of domestic violence and better income opportunities for adults. The evaluation report also provides good insights in the role companies can have in implementing a CLFZ approach⁵.

Community participation is a fundamental element for the success of this concept. At every level, people's participation is ensured so that the community takes the responsibility and ownership of progressively eradicating child labor and working on universal education in the area. For community participation, a mobilization process is done using pressure groups within the communities, awareness campaigns and tools such as street plays, posters and rallies.⁶ Consistent follow-up is carried out with the families and employers to keep child labor from resurfacing.

¹ <https://hivos.org/focal-area/stop-child-labour>

² Specific activities on monitoring and progress measurement are embedded in the various interventions. A baseline survey or situation analyses are done to learn about the households, child labor trends, scope, value of education, level of awareness, etc.

³ <https://www.stopchildlabour.org/about-stop-child-labour/>

⁴ <http://www.indianet.nl/pdf/FinalDeclarationOnCLFZsUganda19042013.pdf>

⁵ http://www.stopchildlabour.org/assets/Final-report-Hivos-child-labour-programme-evaluation-2017_ZN.pdf

⁶ Activities proposed under this intervention focused on mobilising community, forming and strengthening social structures, promoting the involvement of suppliers and companies in the campaign, and lobbying with the government for school strengthening and effective implementation of the labor laws. These activities are based on the principles of inclusion, cooperation, and non-discrimination and emphasize a multi-stakeholder approach that is founded on the concept of rights and employs collective energies towards the common goal of withdrawing all children from work and bringing them to school.

Education remains the primary means through which low-income children break out of the poverty cycle and lift their families or communities out of poverty. As such, an essential part of eliminating child labor through the CLFZ approach in rural, agricultural communities involves ensuring that children have access to quality education. FLA and Hivos intends to work with experienced stakeholders to create safe settings where children can access formal quality education as well as vocational training for older children in need of rehabilitation and skills for gainful employment. Beyond this, FLA and Hivos intends to engage government officials to enforce child labor laws and factor child labor challenges into education policies.

1. What are the objectives of the corrective action?

2. What activities achieve the objectives?

3. Who are the target audiences?

4. Who participates in the design and implementation of the action?

CASE 2: Gender Action Learning at Sustainability (GALS)⁷ approach targets issues at the household level and builds the economic resilience of the community members (esp. women). The approach focuses on improving livelihood, gender balance, and justice at household and community levels.

GALS is a community-led empowerment methodology⁸ used by the FLA for past four years in the cocoa sector in Côte d'Ivoire⁹ which aims to give women as well as men more control over their lives and catalyze and support a sustainable movement for gender justice. In particular, GALS aims to promote women's human rights as stated in the 1979 United Nations Convention on Elimination of All Forms of Discrimination Against Women through community-led gender justice advocacy and mainstreaming into other development interventions.

GALS starts with the individual at different levels from farmers to government and donors: women and men develop their individual visions for change and leadership, with achievable targets and road maps to move towards these visions, based on analysis of their current situation, past achievements and opportunities/strengths and challenges. A key focus is changing gender inequalities within the family and community as challenges, which prevent both women and men at all levels from achieving their vision.

The individual visions, plans, achievements and challenges are then aggregated and analyzed collectively within communities, organizations and institutions to improve decision-making at all levels. Use of diagram tools as well as distinctive participatory principles enables inclusion of very poor people as informed and respected partners in participatory planning processes, even if they have not had the opportunity to learn to read and write. The methodology also develops the conceptual, analytical, "deep listening" and communication skills of powerful individuals, institutions and policy-makers – as well as enabling their own personal development planning.

The participatory process develops practical and sustainable methodologies and guidelines, which can be integrated into livelihood, market and value chain development, financial services and economic policy and decision making. The methodology forms a solid basis for more inclusive, effective and cost-efficient democratic policy development and gender advocacy.

As stated earlier, poverty in a family is often the main reason why child labor persists, so strengthening the socio-economic status of families is an integral part of eliminating child labor. FLA and Hivos intends to develop and implement the robust economic strengthening programs that help build economic resilience in farming communities through the use of three specific tools (Soulmate Visioning, Increasing Income Challenges Action Tree, and Vision Road Journey). The focus will be on increasing household income and especially for women who are better placed to then send children to school, improve their food security and nutrition and have better decision making.

⁷ <http://www.galsatscale.net/>

⁸ http://www.galsatscale.net/_documents/GALSatScale0overviewCoffee.pdf

⁹ <http://www.fairlabor.org/report/gender-dialogue-project-ivory-coast>

1. What are the objectives of the corrective action?

2. What activities achieve the objectives?

3. Who are the target audiences?

4. Who participates in the design and implementation of the action?

CASE 3: Strengthening supply chains governance and management systems by working closely with sourcing companies, their suppliers, cooperatives or traders to improve supply chain transparency, access to remedy, advocacy and leverage government programming¹⁰.

Supply chain approach is a companies' and suppliers' driven approach with companies in the lead, involving various stakeholders at different tiers of their supply chain. In this approach, the companies advocate for improvements in working conditions in their supply chains through establishing standards, monitor child labor through household survey and conduct impact evaluation, implement training and capacity building activities and facilitating remediation at the supplier level. These help them fulfill the various criteria as mentioned in the UN Guiding Principles.

Companies' focus on interventions at the suppliers and other sub-suppliers as they may be perceived to present risks to companies' brand reputation or production processes.

Companies could play an important role in managing their supply chains and by having a partnering attitude with their suppliers and other supply chains partners to work collaboratively on agreed improvements. Companies also help collaborate through industry platforms, disseminate information, and work together with other stakeholders through consultation and dialogue to bring about sustainable change in their supplier base.

FLA has been using the CLEAR (Child Labor Elimination Action and Remediation) approach with one affiliate member since 2014. The CLEAR methodology is based on the following Guiding Principles, to ensure its scalability, sustainability and replicability in other parts of supply chain (in cocoa and other commodities):

1. Integration of project activities with core operations and existing sustainability programs run by the companies and suppliers;
2. Co-creation of the program design, activities and documentation with company's staff, supplier cooperatives and associated communities;
3. Action learning approach to implementation, that is based on the truth build into the proverb: "Tell me and I will forget; show me and I may not remember; involve me and I will understand."

Leveraging existing national programs to avoid duplication and wastage of resources.

¹⁰ According to the US Department of Labor 2016 report "In 2016, Côte d'Ivoire made a significant advancement in efforts to eliminate the worst forms of child labor. The Government enacted the Anti-Trafficking Law that carries more stringent penalties for offenders and adopted a Constitution that explicitly prohibits child labor and enshrines the right to education for both boys and girls. The National School of Administration integrated new modules on child labor into the curriculum for labor inspectors. With the assistance of UNICEF, the Government published a report on the expansion of its child labor monitoring system, SOSTECI, that included child labor prevalence data in three departments. In addition, the First Ladies of Ghana and Côte d'Ivoire signed a joint declaration and cooperative agreement against cross-border human trafficking. The Government also launched a Ten-Year Education Training Plan and entered a partnership agreement with the International Cocoa Initiative to expand SOSTECI and improve school infrastructure in support of the National Action Plan for the Fight Against the Worst Forms of Child Labor.

1. What are the objectives of the corrective action?

2. What activities achieve the objectives?

3. Who are the target audiences?

4. Who participates in the design and implementation of the action?

1.3 FORCED LABOR REMEDIATION

11. What actions can a farmer put in place to prevent forced labor?

Within the following stages of the employment relationship, think of actions that a farmer might take to prevent forced labor:

Recruitment

Working conditions

Termination

12. What could be done in a specific case?

Read each of the cases below and try to identify indicators of forced labor and what could be done to correct the specific situation.

CASE 1

Daniel was born on one of the many islands of Northern Sumatra in Indonesia. At the age of 19, he was approached by Akanda, a man from the next village. Akanda works in Kalimantan on a palm oil plantation 2,000 km away and tells Daniel about the great work and good pay. He has arranged jobs for other workers from their region before, and he convinces Daniel to join some people from the village traveling to Kalimantan. Daniel has been promised a job as truck driver.

Together with a group of 25 workers aged 14 to 50, they travel to Sumatra and stay in the housing provided by Akanda. Akanda explains they he needs to arrange their contracts first before they can continue their journey to Kalimantan, which takes two weeks. During this time Daniel and the others are not allowed to leave the house.

The contract presented to the new recruits is not with a palm oil plantation but with a labor-contracting company for whom Akanda works. The new recruits have to sign the contract before they can leave the house and travel to Kalimantan. The contract includes a clause that the workers would not be able to decide themselves what work to do and they will do any type of work that the employer demands. The daily wages are less than what they expected (less than USD 3 per day). If they do not sign the contract, they must pay for their return home themselves—costly travel. Some of the new recruits argue but are beaten by Akanda.

After arrival at the plantations, Daniel learns that he is not allowed to leave the plantation and needs to submit his passport to the recruiter. His job is not driving a truck but harvesting and collecting fresh fruit. He is given a long sickle to cut the heavy bunches which. He must load fruits in a wheelbarrow and transport them to a collection point. The work on the plantation is heavy, takes long hours. He does not get time for breaks as he is expected to harvest many bunches of fruit per day to meet the target to earn his daily wages. He does not get any days off.

The wages he earns is hardly enough to buy food and other basic utilities. The prices in the local shop are higher than he was used to, and other shops are too far away, as he is not allowed to leave the premises. After four months, Daniel gets injured and takes a loan from the recruiting company to pay for medical treatment. After one year, Daniel is still not able to pay off his debt. Daniel often thinks about leaving but the plantation is remote, and there is hardly any transportation. He recalls that one of his co-workers tried to run away but was captured by the police and brought back to the plantation. The co-worker was beaten by one of the security guards in front of the other worker and now does the dirtiest work.

	Indicator of forced labor	Corrective action
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CASE 2

As the eldest girl among nine children ranging in age from 5 to 18, Fidan, who is 16, dropped out of school in fourth grade because her family owed money. In late April or early May, she and her family left their home in Şanlıurfa to work as seasonal migrant workers. Their first stop was Konya in western Turkey, where the family settled for three months to work in the sugar beet fields. To reach their destination, the contractor rented a minibus for approximately 1,800 Turkish liras and deducted this cost from in lump sum at the end of the season. Before leaving, the family, stocked up on food for the summer. "We buy on credit from food stores and pay them when we return," Fidan says. "Elsewhere, people charge double when they see we are seasonal migrant workers."

This year the family will need to find a new labor contractor. The last middleman who recruited them for the hazelnut harvest has still not paid them wages totaling 3,000 TL (750 USD). He said he would only pay 1,000 TL (250 USD). They have no contract to support their claim, they merely agreed on the departure time when they first met him through an acquaintance. Details about their wages, destination point, and accommodation conditions were not made available to them.

In retrospect, Fidan says they should have anticipated trouble. Six family members, including two of her siblings ages 14 and 12, worked 12 hours a day in the hazelnut gardens. When they used the toilet during working hours, the labor contractor and the garden owner accused them of slacking. They had daily breaks but were often pressured to finish their work. Shouting and verbal abuse were common occurrences. He even made them work in the rain. Each time, they complied without a word because he threatened to withhold their wages. Wages are only paid at the end of the season; they had to comply.

Living and accommodation conditions were challenging. They stayed in a half-demolished storehouse in Düzce with no access to running water. The garden owner did not allow them to collect firewood from his land. The labor contractor did nothing to help; he told Fidan's family they must bear the conditions for the short harvest period of four weeks. Other intermediaries had deceived them in the past. One year, another contractor recruited them for the cherry harvest. In fact, the contractor hired them to work in the cumin fields. He said they would not have accepted the job if he told them the truth.

All family members must work without a day off until the end of the harvest to maximize their income, and every penny earned help during this period since they start off their journey already indebted. Also, they deduct 10% commission from their daily minimum wages. The family must pay its debts and survive on the remaining amount of money until the next season.

	Indicator of forced labor	Corrective action
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CASAE 3

Willy Bassolé is a young boy from Burkina Faso. He was attending school in Burkina Faso until his family decided it was time for him to earn money for the family. His father contacted Bamouni Boubié, a friend originally from Burkina Faso who owns a cocoa farm in Côte d'Ivoire. Bamouni agreed to hire Willy as an annual worker and brought him to Côte d'Ivoire in 2017. He was transported in the bus without a passport or any identification documentation.

He was told to move to Côte d'Ivoire to work with Bamouni. He had no knowledge of the contents of his employment contract, the job he has to do, or how much he will get paid. These aspects were negotiated between his father and Bamouni.

In Côte d'Ivoire, he stays with Bamouni in a rudimentary house located near the farm. When community members or others inquire who he is, he was told by Bamouni to say he is from the extended family of Bamouni, which is not true. Willy knows nobody in Côte d'Ivoire apart from his employer, Bamouni. He knows nobody in the village as he is involved in farm activities all day long and is too tired at night for any socializing.

Willy appears to be a child somewhere between 14 - 15 years old. Yet his employer presents him as 18 years old. He has no identification or other documentation that could establish his age. If external people visit the farm (for e.g., FLA staff or cooperative staff), his employer has forbidden him to talk to them without his presence.

Willy heard about a complaint mechanism available somewhere at the cooperative but heard that it is only for the farmers. He would not dare complain about his situation to anybody, as he fears the aggressive reaction of his employer and would not know where else to go.

The arrangement made by his father is for a minimum of three years. Willy is involved in all tasks related to cocoa farm maintenance: preparing the land, clearing with a machete, applying chemicals, cutting and transporting cocoa pods, etc. He is busy all year long. When there is less to do on the cocoa farm, Willy is asked to help on the cassava farm managed by Bamouni's wife. Willy is not paid for the work he does, not even pocket money. It is not necessary since he is provided house and food. At the end of each year, Bamouni sends the annual payment directly to his father in Burkina Faso. Willy must remain silent and work so that his family can receive money.

	Indicator of forced labor	Corrective action
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13. What could be systematic solutions to address forced labor?

Read the following case study and answer the questions below.

In Malaysia, almost 80 percent of workers in the palm oil sector are foreign migrants, recruited through recruitment agencies. Several reports and stakeholders have discussed this system and explained that it is riddled with deceptive recruitment practices, high recruitment fees, passport retention and poor payment of wages. The recruitment fees charged to workers are so high that they tend to indebt workers. Migrant workers come from Indonesia, Nepal, Bangladesh, India, Myanmar, and the Philippines. Foreign migrant workers are involved in field operations like harvesting (collecting fruit bunches), pruning and spraying. The supervising and administrative work at the plantations is mostly done by Malaysian workers with a permanent contract.

Malaysian recruitment agencies collaborate with alike agencies in the labor-supplying countries to identify and bring in the required number of workers. The Malaysian Ministry of Home Affairs needs to approve the recruitment of foreign workers, with the requirements and procedures differing according to the country of origin of the migrants. It is relatively easy for a company to get workers from Indonesia and Nepal; while Bangladesh authorities are regulating the labor supply from their side and provide a list of available Bangladeshi workers.

Labor brokers play an important role in the recruitment and human resources management of the migrant workers, including arrangement of payments, accommodation, transportation, and obtaining work permits and visas. The broker usually has a contract with the company for whom the workers are being recruited. The contract generally includes terms of payment, number of workers and length of time of work. No clauses on ethical recruitment are included. In the entire recruitment process, several layers of subcontractors may be involved. It should be noted that the system of involving labor contractors and recruitment agents has disadvantages for the companies. Often migrant workers selected by these third parties are not well skilled, prepared and motivated for plantation work.

Recruitment of migrant workers is a highly profitable business, as the agents receive payments from both the employers in need of workers and the migrants searching for work. It is also common for recruitment agents to levy additional service charges to the migrants for making arrangements and registration of immigration documents. To be able to cover these up-front costs, the majority of the migrant workers borrow from relatives, friends, or the agent, under the impression that they will be able to pay back their debt easily with the wages they will be receiving. In reality, the wages are lower than promised and the migrant workers often find themselves in a bonded situation.

Over the years, many migrant workers either left their employer or did not get their permit renewed but remained in Malaysia, which has resulted in many migrants being undocumented. In 2011, there was a

government program to legalize workers, and it was revealed that 50% of the 4.6 million migrants in the country were undocumented. This program did not succeed in the registration and legalization of all migrant workers and therefore there remains a high number of undocumented workers who fear being found by Malaysian authorities and sent to immigration retention centers or jail.

Propose different actions that could be taken in each of the following categories by one or several actors as a remedial proposal to reduce or eliminate forced labor.

Improvement of laws, regulations, enforcement, legal framework

Improvement of supplier companies' practices

Capacity building of various actors active in the palm oil supply chain

14. Who could be implementing partners?

Circle those actors that you think could have a higher leverage in a remediation strategy:

1. Suppliers operating large plantations
2. Small scale producers
3. National government setting regulatory requirements
4. International traders and processors of the specific product in question
5. International companies sourcing the specific product in question
6. International traders and processors of the specific product in question
7. Local and regional authorities responsible for law enforcement and inspections
8. Civil society organizations working on the issues of workers and communities
9. National labor unions representing workers
10. Labor contractors and recruitment agencies responsible for attracting or contracting workers
11. Industry based associations
12. Workers on plantations or farms
13. Certification bodies/due diligence agencies conducting audits and/or standard compliance verification
14. International labor unions and confederation unions

15. What do you see your company doing?

Consider the likelihood of your company taking the following remedial actions as strategies to prevent forced labor.

		Very unlikely	Likely	Very likely
1	<p>Conduct mapping exercises to understand:</p> <ul style="list-style-type: none"> ○ Migration patterns of workers (seasonal, group versus individual, emerging trends, etc.) ○ How workers are physically transported ○ Migration routes ○ The process of recruitment in the home country ○ The first point of contact for workers in the recruitment process ○ Country/area of origin ○ The steps taken for migrant workers to get accepted and to travel from “home” to the plantation ○ Fees paid by workers for the main routes (including a detailed overview of all the steps/elements that these fees should cover) ○ Actual costs involved in the recruitment process ○ The various layers of contractors and sub-agents involved, both in Malaysia as well in the main countries of origin and including making the power relations/major influencers visible ○ Overview of all the requirements and expectations that the recruitment agents—in Malaysia and in the main countries of origin—need to meet, both looking at the regulatory frameworks, government policies, and demands from industry members <p>Experiences, violations, and risks involved regarding all the above-mentioned points</p>			
2	<p>Define sample terms and conditions on ethical recruitment and advocate for (or enforce) contract amendments between suppliers and companies and labor recruitment agencies to include such terms and conditions as part of their contracts.</p>			
3	<p>Multinational companies working with local suppliers should include specific criteria for labor recruitment in the supplier contracts. One way for suppliers to pay attention to these issues is to attach as an addendum to the contracts the set of benchmarks and actions in case of violation of agreements including providing concrete information and opportunities to raise complaints.</p>			
4	<p>Even though a number of research studies have been conducted and are available, neither companies nor suppliers understand forced labor indicators and how to address them. Training for</p>			

	suppliers and labor recruitment agencies on those topics can raise the overall awareness about forced labor. Workers and management at the plantations should be trained together in the same session so that they have a common understanding of do's and don'ts.			
5	Companies and suppliers should work towards a more professional, standardized and transparent recruitment system, with information available in various languages, and using terminology understandable to workers from the main countries of origin.			
6	It is imperative that companies and suppliers have a functioning, easy to use worker voice and grievance mechanism. Companies should seriously consider use of technology for the same. There is need to strengthen the existing grievance handling mechanisms and base them on the UNGP's eight effectiveness criteria.			
7	Suppliers and companies should establish clear procedures for the payment by the employer of the costs and fees involved in the recruitment process of new workers. They should also define clear procedures for the reimbursement of costs and fees paid by current workers as a remediation measure.			
8	Institute a forced labor policy and benchmarks in supplier codes and responsible sourcing guidelines that include at a minimum the three forced labor PIPs and as a next step include several other indicators so as to make company expectations clear to suppliers.			
9	Ensure communication of employment terms and conditions and rights to workers through its suppliers and internal CoC application. This includes workers having proper contracts, access to PPE, and access to decent wages while working within the legal work hours limits.			
10	During monitoring and verification visits, pay special attention to verifying the labor recruitment process, the age of workers at the time of recruitment and whether workers' family members are assisting to finish allotted activities to be able to earn minimum wages.			
11	Conduct dialogue with suppliers on their lack of engagement with this scoping exercise and to resolve their existing concerns.			