

05 Guidance for forced labour grievances

This document was commissioned by Cargill and written by Proforest and the Fair Labor Association as part of work with Cargill on grievances and how to address grievances with its suppliers. It was designed to guide internal processes, but Cargill decided to make the short guidance public to demonstrate how it approaches these issues. The long form of this guidance will not be published – but is referenced in places throughout this document, and these references have been left in to demonstrate where more information is available. If you are interested please send a request to receive the more detailed information to info@proforest.net

Introduction

Many companies all along the palm oil supply chain have made commitments to no Exploitation as part of their responsible palm production and sourcing commitments and policies.

Under No Exploitation, forced labour is a key issue as, if not done correctly, it can result in workers not being employed voluntarily or under conditions that can have negative impacts on their human rights.

This document provides practical and action-oriented guidance on how to manage and address grievances related to forced labour in the palm oil sector. The guidance provides information about how to verify and identify causes of grievances, develop action plans for remediation and resolution, and minimise chances of future non-compliance and conflict.



This guidance is primarily developed for growers or mills as a first point of contact, but corrective actions ultimately need to be carried out wherever forced labour is occurring, whether in mills, plantations they own or/and plantations of outgrower or smallholder farms they source from.



What is meant by a grievance?

A grievance, in the context of the palm oil sector, may be defined as a complaint or allegation of a practice that may go against international standards, company policies or industry best-practices. It usually relates to a company's responsibilities to respect the rights of their employees and neighbouring communities as well as protect the surrounding environment. When individuals, communities, civil society organisations, media and even government agencies identify specific harms that they wish a company to address, they may be termed 'concerns', 'complaints' or 'grievances' or given a different name. They may be raised directly with the company through a formal communication that enters directly into a company's grievance mechanism, or they may arise through informal communication and/or be put forward by proxy through a third party (e.g. by an NGO in a public report).

In the palm oil sector, grievances are usually raised around the production practices of oil palm and therefore fall under the responsibility of the grower or mill. However, grievances at production level may also be raised to downstream companies who source palm oil, in which case they may raise these grievances to those suppliers concerned and routinely follow up to check on progress in resolving them. This also applies to grievances raised against mills concerning the practices of their third-party suppliers (e.g. traders/collectors, outgrowers and independent smallholders).

If left unresolved, grievances can antagonise stakeholders, attract widespread attention, cause damage to a company's reputation as well as that of their buyers, and, in some cases, result in business losses or failure.

What is Forced Labour?

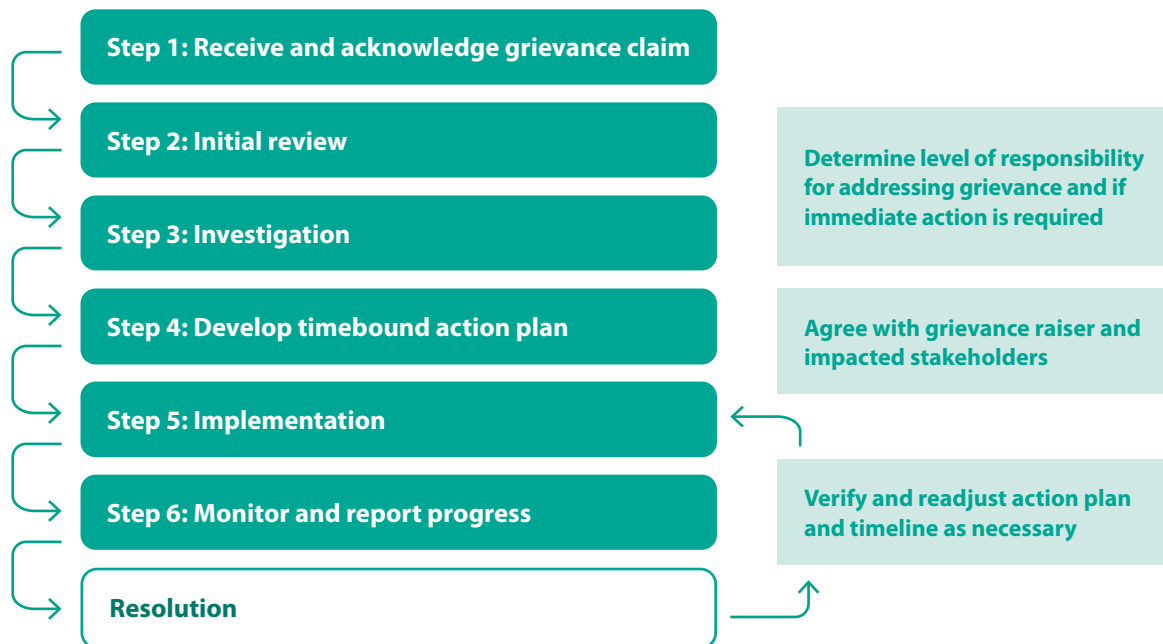
Forced or compulsory labour is defined as such when undertaking work, or a service, is demanded from a person **under the threat and risk of any penalty** applied to the worker by an employer or a third party, and when the said person **has not offered themselves voluntarily**.

There are various points in the employment cycle where involuntariness can occur. These have been grouped by the ILO under the three following phases:

1. Recruitment phase.
2. Employment phase.
3. Termination phase.

Addressing forced labour grievances

A mill or grower that is subject to a grievance must follow a series of steps to address the grievance, presented in the figure below. These should be followed systematically and agreed with relevant stakeholders, in a **transparent, consultative and appropriate** manner.



For further details, please refer to the grievance series [Introduction document](#).

Step 1: Receive and acknowledge grievance claim

On receipt of a grievance claim, the first step is to assign a member of staff to be responsible for investigating and if necessary, resolving the grievance claim. Once the grievance has been assigned the responsible person needs to contact the grievance raiser to acknowledge receipt of the grievance and inform them on a timeline of an initial response, including whether the grievance is going to be accepted. The grievance holder must confirm whether grievance raiser and/or affected parties wish to keep their identity confidential. Third party entities such as legal experts and/or, experienced NGOs to can be hired to support the investigation.

Step 2 & 3: Initial Review and Investigation

Having acknowledged receipt of the grievance, it is then necessary for the grievance holder to conduct an initial assessment to help understand their responsibility towards remedying it. In the case of a forced labour grievance, this initial assessment is also vital in understanding the forced labour situation and the evidence available. This is done by gathering information and starting a “case file” where all information related to this particular grievance is collected.

This information will help evaluate whether there is already sufficient evidence to demonstrate which type of forced labour grievance is occurring, keeping in mind that:

Identifying the occurrence of forced labour requires understanding of:

- a. Involuntariness
- b. Penalty, menace of penalty and coercion
- c. Severity of indicators

All three factors need to be considered together to identify whether forced labour is occurring. Only once the types and degree to which involuntariness and risk of penalty are taking place have been analysed, can the root-causes be analysed in order to help define which interventions should be taken to remedy the forced labour issue.

The overall investigation process should be explained to the grievance raiser so that they have an opportunity to suggest witnesses and present relevant information. If the grievance raiser is from another country or ethnic group, assistance of an interpreter may be needed. During this internal investigation, all activities, supporting evidence and findings must be carefully documented and shared with the grievance raiser.



Investigating forced labour grievances

Investigating forced labour grievances requires **gathering a wide range of information**. Because of the complexity of the issues involved, it is necessary to **work with various expert organisations and create an expert committee or network** to help determine the best way to proceed with the process of remediation, with the view to ultimately remedy the grievance itself and underlying root causes that have contributed to it occurring in the first place. **Workers’ Rights Organisations and local expert organisations will also be integral in helping to analyse this information and ensure that all the root-causes are identified and analysed.**



What should I look for when identifying potential expert organisations?

These questions can be useful when identifying experts in labour rights and forced labour issues are:

- Do they have extensive knowledge of workers' rights and forced labour in the local area?
- Do workers and/or local communities trust them and are they willing to work with the organisation or person?
- Do they represent the best interests of workers by demonstrating a knowledge of the needs and rights of workers?
- Can they demonstrate any training or skills that qualifies them to work with and represent workers?
- Do they understand the need to protect the confidentiality and privacy of the worker?
- Do they demonstrate good understanding of the legal aspects of labour grievances and what information needs to be shared with local authorities?



Characteristics of Grievance Handling Staff and Process

When a grievance is received, the grievance holder will assign a staff member or a team to handle the grievance. Given that forced labour cases may involve sensitive issues with a vulnerable group/s, it is expected that the members of staff possess certain qualities such as being able to:

- Be objective, impartial and fair throughout the process;
- Be sensitive to situations and adaptive; and
- Conduct grievance related activities competently with the highest levels of integrity.

Step 4: Development of timebound action plan

Identifying which type of forced labour is occurring is important in helping develop an action plan, which details the activities to take place. To reach this stage, you will need to have:

1. An internal person or team responsible for the forced labour grievance;
2. Engaged a network of expert organisations and relevant government or district level bodies such as the social services;
3. Collected all the information and data on the grievance;
4. Understood the root causes of this grievance and understood where you can effect change or need to work on a higher level with other stakeholders to address the issues;
5. Analysed exactly which type of forced labour the grievance is referring to and which type of remediation approach is appropriate to take; and
6. Knowledge of the different methods available to resolve this grievance (or the experts to get support).

Guidance for forced labour grievances

There are multiple objectives for the action plan: to ensure that the affected workers do not return to forced labour either in the palm oil sector or other sectors in the region, to address root causes and drivers of the issue and to remedy the affected workers and/or their families (this can include compensation).

Appropriate actions should be determined based on consultation and collaboration with those involved in the forced labour grievance, including the affected party, their family, the grievance raiser and other experts where necessary.

Specific activities defined in the action plan are described in this section. Common aspects of interventions that should be considered in forced labour scenarios include:

- ✓ Reversal of forced labour indicators by actions such as:
 - defining clear employment relations (articulating who the legal employer is);
 - eliminating the payment of recruitment fees by the workers during the recruitment process;
 - providing a legal written contract to the worker;
 - stopping retention of identity papers / passport etc. and facilitating their return and mechanisms of safekeeping by workers themselves;
 - reducing excessive work quotas without a decrease in compensation;
 - improving in living conditions;
 - removing restrictions on freedom of movement; and
 - removing any harassment or abuse.
- ✓ Dialogue and negotiation between workers and employers (i.e. labour contractors or mills/plantations) to establish clear terms and conditions such as the nature of work, hours of work, egress times, conditions, etc. so that workers understand and agree to the terms and conditions;
- ✓ Provision of support and rehabilitation, if the workers are distressed;
- ✓ Financial and non-financial support (e.g. to assist workers in reducing debt, to help repatriate back home);
- ✓ Mediation;
- ✓ Formal apology (verbal and written);
- ✓ Payment of money owed to victims (e.g., back pay, overtime pay, recruitment fee; repatriation cost, if it was promised);
- ✓ Engagement with the labour contractor/employment agency to pay the contracted wages to the worker and maintain the records; and
- ✓ Reversal of an employment decision (e.g., where a worker was unfairly dismissed).

More guidance on typical root causes, proposed remedial actions and recommended milestones as well as a timeframe to address the issues can be found in Table 1 (page 8).

Step 5: Implementation

Having finalised the action plan and incorporated stakeholder feedback, particularly considering the viewpoints of the affected party, the plan then needs to be implemented. This means turning the action plan into day-to-day responsibilities, workplans, etc. If different activities are implemented by different staff members and over different time scales, it is important that an overall lead manager is appointed. The responsible person will need to keep communicating progress with the grievance raiser, the affected party, those working on the grievance internally and other stakeholders on a regular basis.

Step 6: Monitor and report

Once the action plan implementation is underway, the next step is to monitor and report on progress against it. This means measuring progress against the agreed outcomes and progress indicators included in the action plan. Progress should then be reported to the grievance raiser and affected party on a regular basis. It is recommended to invite the grievance raiser or a third party to visit at intervals as part of monitoring and verifying progress.

To resolve the grievance, the grievance holder, raiser, and affected party should discuss and agree at what stage sufficient progress in implementation has been made to allow the grievance to be considered closed. Normally the grievance raiser and holder can agree to a monitoring period that varies from a few months to a year from the point that the action plan is agreed. If all parties accept that the initially agreed outcomes for that time period were met, then the grievance can be considered closed. Grievance raisers will expect to see evidence that the grievance holder has taken the plan seriously by allocating adequate resources, and competent and trained staff to its implementation.

Table 1 – Overview of findings that can indicate presence of forced labour, typical root causes and proposed actions to address finding.

- Recruitment
- Employment
- Termination

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
<ul style="list-style-type: none"> • Deceptive or untruthful information about the jobs and workplace provided through job advertisements, interviews and contracts, such as: <ul style="list-style-type: none"> • working conditions, • legality of employment contracts, • employment terms, • housing and living conditions, • legal documentations and legal supports, • locations and employer, and • wages 	Illiteracy of candidates; lack of education among candidates.	<ul style="list-style-type: none"> • Reach out to possible (migrant) workers and workers communities about employment opportunities (e.g. information flyers for labour contractors to take on behalf of the suppliers) to ensure that the basic employment and related conditions are understood; • Request labour contractors to post the job advertisements that is aligned with general terms and conditions of work; including required skills or abilities (see more on the need to screen labour contractors' practices); and/or • Establish onboarding/ pre-employment meetings with workers to explain the basic employment and related conditions. 	Target communities were outreached.	Short to medium
			<ul style="list-style-type: none"> • Workers were hired from the communities that were outreached. 	Medium
<ul style="list-style-type: none"> • Lack of contracts from which workers and candidates understand the terms and conditions. 	Lack of contracts from which workers and candidates understand the terms and conditions.	<ul style="list-style-type: none"> • Provide or require labour contractors to provide an employment contract (1) to every worker, which is (2) written, (3) is in language understood by the worker and (4) includes terms and conditions of the employment; and/or • Include in the contracts that the terms and conditions will not change without the knowledge and consent of the worker; if there will be change then consent must be obtained voluntarily and without threat of penalty. 	Labour contractors' job advertisements have been reviewed and verified that they were correctly aligned with the terms and conditions.	Short
			<ul style="list-style-type: none"> • Workers' expectations for and understanding of the job are realistic (i.e. a result of onboarding meetings). 	Medium to long
<ul style="list-style-type: none"> • The content and format of the workers' contracts were verified. 	The content and format of the workers' contracts were verified.	<ul style="list-style-type: none"> • Workers acknowledge the receipt and the understanding of their contracts. 	The content and format of the workers' contracts were verified.	Short to medium
			<ul style="list-style-type: none"> • Workers acknowledge the receipt and the understanding of their contracts. 	Short to medium

<p>Lack of accountability among labour contractors (i.e. no expectations; no standards).</p>	<ul style="list-style-type: none"> Assess labour contractors, including their compliance with the local laws and regulations; Engage with credible, legally registered labour brokers and recruit-ment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Review the job advertisements and postings and contracts of the labour contractors; and Provide legal advice on immigration statuses of hired workers. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Information provided by the labour contractors to candidates and workers is reviewed and found acceptable. Workers' immigration statuses are better understood, their needs to maintain the employment and proposed solutions are identified. 	<p>Medium to long</p> <p>Medium to long</p> <p>Short</p> <p>Short to long</p>
<p>Labour contractors' lack of knowledge on fair recruitment practices/ standards</p>	<ul style="list-style-type: none"> Establish a contract (terms and conditions) with the labour contractors, which requires the implementation of fair labour standards/ practices and the right to review their contracts with workers, payment records and other documentation; Communicate to and educate the labour contractors about the fair labour recruitment standards/ practices; Request and review the contracts, payment records or other documentation against the fair labour standards/ practices; and/or Train your middle management (supervisors and foremen) so that they can be watchful about the unfair recruitment practices. 	<ul style="list-style-type: none"> The revised / new contracts with labour contractors are implemented. The labour contractor's contracts with workers are reviewed and confirmed to be in line with the fair labour practices. The payment records were periodically reviewed and verified that they are in line with the fair labour practices (e.g. evidence of repayment; if recruitment fees were taken; deduction of debt payment has been stopped; etc.). 	<p>Medium to long</p> <p>Medium</p> <p>Medium to long</p>

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Recruitment linked to debt (advance or loan).	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors, including their linkage of debts with employment; Engage with credible, legally registered labour brokers and recruit-ment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Review the job advertisements and postings and contracts of the labour contractors; and Discuss with the labour contractors not to pass the cost of immi-gration to workers 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Information provided by the labour contractors to candidates and workers is reviewed and found acceptable. Agree with labour contractors about the cost of immigration. 	Medium to long
Labour contractors' lack of knowledge on fair recruitment practices/ standards.	Labour contractors' lack of knowledge on fair recruitment practices/ standards.	<ul style="list-style-type: none"> Establish a contract (terms and conditions) with the labour contractors, which requires the implementation of fair labour standards/ practices and the right to review their contracts with workers, payment records and other documentation; Communicate to and educate the labour contractors about the fair labour recruitment standards/practices; Request and review the contracts, payment records or other documentation against the fair labour standards/ practices; and/or Train your middle management (supervisors and foremen) so that they can be watchful about the unfair recruitment practices. 	<ul style="list-style-type: none"> The revised/new contracts with labour contractors are implemented. The labour contractor's contracts with workers are reviewed and con-firmed to be in line with the fair labour practices. The payment records were periodically reviewed and verified that they are in line with the fair labour practices (e.g. evidence of repayment, if recruitment fees were taken; deduction of debt payment has been stopped; etc.) 	Medium to long

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
No worker contracts (or lack of understanding of contracts by workers).	Illiteracy of candidates; lack of education among candidates.	<ul style="list-style-type: none"> Reach out to possible (migrant) workers and workers communities about employment opportunities (e.g. information flyers for labour contractors to take on behalf of the suppliers) to ensure that the basic employment and related conditions are understood; Request labour contractors to post the job advertisement that is aligned with general terms and conditions of work; including required skills or abilities (see more on the need to screen labour contractors' practices); and/or Establish onboarding/ pre-employment meetings with workers to explain the basic employment and related conditions. 	<ul style="list-style-type: none"> Target communities were outreached. 	Short to medium
	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors, including their communication methods of terms and conditions to workers; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Review the job advertisements and postings and contracts of the labour contractors; and Discuss with the labour contractors not to pass the cost of immigration to workers. 	<ul style="list-style-type: none"> Workers were hired from the communities that were outreached. Labour contractors' job advertisements have been reviewed and verified that they were correctly aligned with the terms and conditions. Workers' expectations for and understanding of the job are realistic (i.e. a result of onboarding meetings). 	Medium
Labour contractors' lack of knowledge on fair recruitment practices/ standards.	Labour contractors' lack of knowledge on fair recruitment practices/ standards.	<ul style="list-style-type: none"> Establish a contract (terms and conditions) with the labour contractors, which requires the implementation of fair labour standards/ practices and the right to review their contracts with workers, payment records and other documentation; Communicate to and educate the labour contractors about the fair labour recruitment standards/ practices; and/or Request and review the contracts, payment records or other documentation against the fair labour standards/ practices. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Information provided by the labour contractors to candidates and work-ers is reviewed and found acceptable. Agree with labour contractors about the cost of immigration. The revised/ new contracts with labour contractors are implemented. 	Medium to long
			<ul style="list-style-type: none"> The labour contractor's contracts with workers are reviewed and confirmed to be in line with the fair labour practices. 	Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
Recruitment fees charged (including unjustified charges for food, clothing, transportation, health checks, work documentation or deposit).	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors, including the recruitment fees; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Review the job advertisements and postings and contracts of the labour contractors; and Discuss with the labour contractors not to pass the recruitment fees. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Information provided by the labour contractors to candidates and workers is reviewed and found acceptable. Agree with labour contractors about the cost of recruitment fees. 	Medium to long
Labour contractors' lack of knowledge on fair recruitment practices/ standards.	Labour contractors' lack of knowledge on fair recruitment practices/ standards.	<ul style="list-style-type: none"> Establish a contract (terms and conditions) with the labour contractors, which requires the implementation of fair labour standards/ practices and the right to review their contracts with workers, payment records and other documentation; Communicate to and educate the labour contractors about the fair labour recruitment standards/ practices; and/or Request and review the contracts, payment records or other documentation against the fair labour standards/ practices. 	<ul style="list-style-type: none"> Monetary advances are provided to the workers for travel or as confirmation of employment without creating an excessive payment schedule or debt bondage. The revised/ new contracts with labour contractors are implemented. The labour contractor's contracts with workers are reviewed and confirmed to be in line with the fair labour practices. The payment records were periodically reviewed and verified that they are in line with the fair labour practices (e.g. evidence of repayment, if recruitment fees were taken; deduction of debt payment has been stopped; etc.). 	Short to long

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
Withholding or confiscation of assets (cash or other) or travel documents during recruitment phase.	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors, including their treatment of personal items and assets; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Review the job advertisements and postings and contracts of the labour contractors; and Discuss with the labour contractors not to pass the recruitment fees. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Information provided by the labour contractors to candidates and workers is reviewed and found acceptable. Agree with labour contractors about the cost of recruitment fees. 	Medium to long
	Labour contractors' lack of knowledge on fair recruitment practices/ standards.	<ul style="list-style-type: none"> Establish a contract (terms and conditions) with the labour contractors, which requires the implementation of fair labour standards/ practices and the right to review their contracts with workers, payment records and other documentation; Communicate to and educate the labour contractors about the fair labour recruitment standards/ practices; and/or Request and review the contracts, payment records or other documentation against the fair labour standards/ practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented. The labour contractor's contracts with workers are reviewed and confirmed to be in line with the fair labour practices. 	Medium to long

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Abduction or confinement of individuals (workers) during the recruitment process.	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors, including treatment of individuals during the recruitment; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Review the job advertisements and postings and contracts of the labour contractors; Establish a contract (terms and conditions) with the labour contractors to require the implementation of the fair standards/ practices; and/or Discuss with the labour contractors not to pass the recruitment fees. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Information provided by the labour contractors to candidates and workers is reviewed and found acceptable. Agree with labour contractors about the cost of recruitment fees. 	Medium to long Medium to long Short Short to long
Lack of knowledge on fair recruitment practices/ standards by labour contractors.	Lack of knowledge on fair recruitment practices/ standards by labour contractors.	<ul style="list-style-type: none"> Establish a contract (terms and conditions) with the labour contractors, which requires the implementation of fair labour standards/ practices and the right to review their contracts with workers, payment records and other documentation; Communicate to and educate the labour contractors about the fair labour recruitment standards/ practices; and/or Request and review the contracts, payment records or other documentation against the fair labour standards/ practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented. The labour contractor's contracts with workers are reviewed and confirmed to be in line with the fair labour practices. 	Medium to long Medium
Lack of information about workers' experience during recruitment.	Lack of information about workers' experience during recruitment.	<ul style="list-style-type: none"> Establish a grievance system or conduct a survey to inquire about the recruitment experience, to supplement the assessment of labour contractors. 	<ul style="list-style-type: none"> Establish a worker voice mechanism or conduct a survey to inquire about specific recruitment experience. 	Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Forced overtime (beyond legal limit).	<p>Poor operational and financial management.</p>	<ul style="list-style-type: none"> • Improve the record keeping practices of the entity that pays the workers (e.g. labour contractors, mills or plantations), if the record keeping practice regarding regular and overtime and payment amount and timing is poor, and the financial viability to make the correct payment on time; • Improve production and capacity planning so that the work targets are reasonable (i.e. reasonable working hours, rest breaks and days and wages above local minimum wages); • Ensure that the wage structures are fair (i.e. provide proper incentives for overtime so that it is voluntarily sought without being forced); and/or • Prohibit/ eliminate the use of monetary fines and penalties as a means for labour disciplines for poor performance and violations of policies and regulations. 	<ul style="list-style-type: none"> • Assessment for entities paying the workers are completed. • Support or improvements are planned (e.g. setting up an adequate wage structure; setting up a record keeping system; revising disciplinary actions). 	<p>Medium</p> <p>Medium to long</p>
Workers' lack of knowledge and understanding about the terms and conditions.	Workers' lack of knowledge and understanding about the terms and conditions.	<ul style="list-style-type: none"> • Reach out and inform possible (migrant) workers and workers about terms and conditions, including what is acceptable and not acceptable among the labour contractors' offers and requests; and/or • Establish onboarding/ pre-employment meetings with workers to ensure that the basic employment and related conditions are understood. 	<ul style="list-style-type: none"> • Target workers were outreached and informed. • Workers' understanding of fair recruitment practices (i.e. acceptable and unacceptable offers and requests) improved. 	<p>Short to medium</p> <p>Medium</p>
Lack of knowledge of fair labour practices/ standards.	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts, payment records or other documentations to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Examples of labour practices are shared, and the improvements are discussed and planned. 	<p>Short to medium</p> <p>Short to medium</p>

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Limited freedom of movement (e.g. security practices, verbal instructions, etc.).	Workers' lack of knowledge and understanding about the terms and conditions.	<ul style="list-style-type: none"> Reach out and inform possible (migrant) workers and employers about terms and conditions, including what is acceptable and not acceptable among the labour contractors' offers and requests; and/or Establish onboarding/ pre-employment meetings with workers to ensure that the basic employment and related conditions are understood. 	<ul style="list-style-type: none"> Target workers were outreached and informed. Workers' understanding of fair re-recruitment practices (i.e. acceptable and unacceptable offers and re-requests) improved. 	Short to medium
	Lack of respects for workers' human needs and their customs, cultures and social norms	<ul style="list-style-type: none"> Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce workers to the management of plantations and mills; Provide access to a grievance system; Transportation of injured or ill workers should be granted and should be provided by the employer; and/or Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> Regardless the type of workers, equal treatment is established (e.g. the same access to a grievance system; the same availability of transportation of injured workers; etc.) was implemented; and/or Middle management (supervisors and foremen) were trained. 	Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Limited freedom of communications.	Workers' lack of knowledge and understanding about the terms and conditions.	<ul style="list-style-type: none"> Reach out and inform possible (migrant) workers and workers about terms and conditions, including what is acceptable and not acceptable among the labour contractors' offers and requests; and/or Establish onboarding/ pre-employment meetings with workers to ensure that the basic employment and related conditions are understood. 	<ul style="list-style-type: none"> Target workers were outreached and informed. 	Short to medium
	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce workers to the management of plantations and mills; Provide access to a grievance system; Transportation of injured or ill workers should be granted and should be provided by the employer; and/or Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> Workers' understanding of fair recruitment practices (i.e. acceptable and unacceptable offers and requests) improved. 	Medium
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> Regardless the type of workers, equal treatment is established (e.g. the same access to a grievance system; the same availability of transportation of injured workers; etc.) was implemented; and/or Middle management (supervisors and foremen) were trained. 	Medium
			<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. 	Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Degrading living conditions.	Workers' lack of knowledge and understanding about the terms and conditions.	<ul style="list-style-type: none"> Reach out and inform possible (migrant) workers and workers about terms and conditions, including what is acceptable and not acceptable among the labour contractors' offers and requests; and/or Establish onboarding/ pre-employment meetings with workers to ensure that the basic employment and related conditions are understood. 	<ul style="list-style-type: none"> Target workers were outreached and informed. 	Short to medium
	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce workers to the management of plantations and mills; Provide access to a grievance system; Transportation of injured or ill workers should be granted and should be provided by the employer; and/or Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> Workers' understanding of fair recruitment practices (i.e. acceptable and unacceptable offers and requests) improved. Minimum accommodation standards are established and the plan to address the gaps is made. 	Medium
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentations to provide sup-port and feedback to improve their labour practices. 	<ul style="list-style-type: none"> Middle management (supervisors and foremen) were trained. The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. 	Medium
				Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
Induced or inflated indebtedness (e.g. account falsification, inflated prices for goods/services, reduced value of goods/services produced, excessive interest rates on loans, unjustified deductions)	Workers' lack of knowledge and understanding about the terms and conditions.	<ul style="list-style-type: none"> Reach out and inform possible (migrant) workers and workers about terms and conditions, including what is acceptable and not acceptable among the labour contractors' offers and requests; and/or Establish onboarding/ pre-employment meetings with workers to ensure that the basic employment and related conditions are understood. 	<ul style="list-style-type: none"> Target workers were outreached and informed 	Short to medium
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> Workers' understanding of fair recruitment practices (i.e. acceptable and unacceptable offers and requests) improved. The revised/ new contracts with labour contractors are implemented and the performance is monitored. 	Medium
Coercion to purchase the employer-offered services (e.g. housing, transportation)	Workers' lack of access to their own employment records and information.	<ul style="list-style-type: none"> Provide an access to their employment record; and/or Maintain itemised payment records for all workers. 	<ul style="list-style-type: none"> Examples of labour practices are shared, and the improvements are discussed and planned. Workers are able to verify the discrepancies between the actuals and the contract terms. 	Short to medium
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Free or supplier-paid transportation (transit) of workers from home-base location to the work locations is provided. Examples of labour practices are shared, and the improvements are discussed and planned. 	Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
Excessive wage advances (more than three-month salary or beyond legal limits)	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium
			<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. 	Short to medium
Withholding or confiscation of identify papers and travel documents	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors, including their compliance with the local laws and regulations; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Establish a contract (terms and conditions) with the labour contractors to require the implementation of the fair standards/ practices; and/or Provide legal advice on immigration statuses of hired workers. 	<ul style="list-style-type: none"> Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Workers' immigration statuses are better understood, their needs to maintain the employment and proposed solutions are identified. 	Medium to long
			<ul style="list-style-type: none"> Workers' immigration statuses are better understood, their needs to maintain the employment and proposed solutions are identified. 	Short to long
			<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Worsening working conditions (e.g. increasing forced overtime, reduction in rest and breaks, increasing quota, shortening of contract periods).	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts and other documentations to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Established criteria (e.g. type of work, length of services) to turn casual or contract workers into a permanent employment contract. • Established monitoring of work tar-gets and working hours and fair compensation system (wage rates and payment schedules). 	Short to medium
	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> • Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce work-ers to the management of plantations and mills; • Provide access to a grievance system; • Transportation of injured or ill workers should be granted and should be provided by the employer; and/or • Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> • Examples of labour practices are shared, and the improvements are discussed and planned. • The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium
			<ul style="list-style-type: none"> • Working conditions have been reviewed against terms and conditions and/or local laws and regulations and the gaps have been identified; and/or • Middle management (supervisors and foremen) were trained. 	Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Violence against or humiliation of worker	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts and other documentations to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Examples of labour practices are shared, and the improvements are discussed and planned. • The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium
	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> • Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce workers to the management of plantations and mills; • Provide access to a grievance system; • Transportation of injured or ill workers should be granted and should be provided by the employer; and/or • Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> • A policy against harassment, including violence and humiliation, is established and middle management (supervisors and foremen) and labour contractors are trained; and/or • Middle management (supervisors and foremen) were trained. 	Short to medium
				Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Withholding of assets (cash or other) and wages or deduction from wages.	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Examples of labour practices are shared, and the improvements are discussed and planned. • The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium
	Poor operational and financial management.	<ul style="list-style-type: none"> • Improve the record keeping practices of the entity that pays the workers (e.g. labour contractors, mills or plantations), if the record keeping practice regarding regular and overtime and payment amount and timing is poor, and the financial viability to make the correct payment on time; • Improve production and capacity planning so that the work targets are reasonable (i.e. reasonable working hours, rest breaks and days and wages above local minimum wages); and/or • Prohibit/ eliminate the use of monetary fines and penalties as a means for labour disciplines for poor performance and violations of policies and regulations. 	<ul style="list-style-type: none"> • Assessment for entities paying the workers are completed. • Support or improvements are planned (e.g. setting up an itemised record keeping system; revising disciplinary actions). 	Short to medium Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Remoteness of the work locations (i.e. lack of freedom in movement or isolation).	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts and other documentations to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Examples of labour practices are shared, and the improvements are discussed and planned. • The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium
Threat against undocumented workers to report to authorities.	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> • Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce workers to the management of plantations and mills; • Provide access to a grievance system; • Transportation of injured or ill workers should be granted and should be provided by the employer; and/or • Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> • Middle management (supervisors and foremen) were trained. • A clear policy and process for undocumented workers were established and became effective. 	Medium
Threat against undocumented workers to report to authorities.	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> • Management of plantations and mills determines and explains the working conditions and compensations to workers/ introduce workers to the management of plantations and mills; • Provide access to a grievance system; • Transportation of injured or ill workers should be granted and should be provided by the employer; and/or • Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> • Middle management (supervisors and foremen) were trained. • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Examples of labour practices are shared, and the improvements are discussed and planned. • The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Withholding of last wage(s) after the end of the contracted period.	Lack of contracts.	<ul style="list-style-type: none"> Provide or require labour contractors to provide an employment contract (1) to every worker, which (2) is written, (3) is in language understood by the worker and (4) includes terms and conditions of the employment; and/or Include in the contracts that the terms and conditions will not change without the knowledge and consent of the worker; if there will be change then consent must be obtained voluntarily and without threat of penalty. 	<ul style="list-style-type: none"> The content and format of the workers' contracts were verified. 	Short to medium
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> Workers acknowledge the receipt and the understanding of their contracts. 	Short to medium
	Poor enforcement of operational policies and practices.	<ul style="list-style-type: none"> Conduct management audits (of the mills, plantations or labour contractors) to identify gaps in proper management functions; Provide access to a grievance system; and/or Establish a policy and procedures for termination and repatriation. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. The plan to reduce the accumulated wage advances is made and implemented. 	Short to medium Short to medium
			<ul style="list-style-type: none"> A clear termination policy and procedure of the labour contractor is established (or the supplier's policy became applicable to all workers), management staff are trained. 	Medium
			<ul style="list-style-type: none"> Labour contractors stopped the wage withholding of terminating workers. 	Medium to long

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
<p>Indeterminate period of work contract due to the debts or excessive wage advances.</p>	<p>Lack of accountability among labour contractors or middle management (i.e. no expectations; no standards).</p>	<ul style="list-style-type: none"> Assess labour contractors or middle management, including their compliance with the local laws and regulations; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; Establish a contract (terms and conditions) with the labour contractors to require the implementation of the fair standards/ practices; and/ or Work out a financial and work plan to reduce or forgive debts and excessive advances. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). A policy and procedure to reduce or forgive the debts or excessive advances is developed. 	<p>Medium to long</p> <p>Medium to long</p> <p>Medium to long</p>
	<p>Lack of contracts.</p>	<ul style="list-style-type: none"> Provide or require labour contractors to provide an employment contract (1) to every worker, which (2) is written, (3) is in language understood by the worker and (4) includes terms and conditions of the employment; and/or Include in the contracts that the terms and conditions will not change without the knowledge and consent of the worker; if there will be change then consent must be obtained voluntarily and with-out threat of penalty. 	<ul style="list-style-type: none"> The content and format of the workers' contracts were verified. Workers acknowledge the receipt and the understanding of their contracts. 	<p>Short to medium</p> <p>Short to medium</p>
	<p>Lack of knowledge of fair labour practices/ standards.</p>	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. The plan to reduce the accumulated wage advances is made and implemented. 	<p>Short to medium</p> <p>Short to medium</p> <p>Short to medium</p>

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Withholding or confiscation of personal items (identify papers, travel documents, assets) or imposing financial penalties.	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors or middle management (supervisors/ foremen), including their compliance with the local laws and regulations; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; and/or Establish a contract (terms and conditions) with the labour contractors to require the implementation of the fair standards/ practices. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Minimum standards on fair labour practices are established and implemented. 	Medium to long Medium to long Medium to long
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; Prepare a longer term workforce plan so that workers' contract periods can be respected; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentations to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. The long-term planning for workforce is discussed and implemented. 	Short to medium Short to medium Short to medium
	Lack of contracts.	<ul style="list-style-type: none"> Provide or require labour contractors to provide an employment contract (1) to every worker, which (2) is written, (3) is in language understood by the worker and (4) includes terms and conditions of the employment; Include in the contracts that the terms and conditions will not change without the knowledge and consent of the worker; if there will be change then consent must be obtained voluntarily and without threat of penalty; and/or Ensure that the contracts do not include unfair or threatening labour practices and penalties. 	<ul style="list-style-type: none"> The content and format of the workers' contracts were verified. Workers acknowledge the receipt and the understanding of their contracts. 	Short to medium Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
Under constant surveillance	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> • Get the management of plantations and mills to know about workers/ introduce workers to the management of plantations and mills; • Provide access to a grievance system; • Establish a clear policy and process for undocumented workers if such workers are identified; and/or • Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> • A clear policy and process for undocumented workers were established and became effective. 	Medium
			<ul style="list-style-type: none"> • Middle management (supervisors and foremen) were trained. 	Medium
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. 	Short to medium
			<ul style="list-style-type: none"> • Examples of labour practices are shared, and the improvements are discussed and planned. 	Short to medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe Short: 1-6 months Medium: 6-12 months Long: 9-15 months
Violence towards workers in front of other workers.	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> • Get the management of plantations and mills to know about workers/ introduce workers to the management of plantations and mills; • Provide access to a grievance system; • Establish a clear policy and process for undocumented workers if such workers are identified; and/or • Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> • A clear policy and process for undocumented workers were established and became effective. • Middle management (supervisors and foremen) were trained. 	Medium
Violence towards workers in front of other workers.	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> • Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; and/or • Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> • The revised/ new contracts with labour contractors are implemented and the performance is monitored. • Examples of labour practices are shared, and the improvements are discussed and planned. 	Short to medium
Violence towards workers in front of other workers.	Poor management and control.	<ul style="list-style-type: none"> • Assess the management practices and policies; • Establish a basic human rights policy and train middle management (supervisors and foremen) and labour contractors; • Implement a grievance mechanism; and/or • Provide information on external resources and services in case of violence at work 	<ul style="list-style-type: none"> • Assessment for management practices and policies are completed. • Information on external resources are posted and/or provided to individual workers. 	Medium

Forced Labour Indicators/ Findings	Possible Root Causes	Suggested Remedial Actions to Prevent the Recurrence	Sample Milestones	Timeframe
Threats against family members (violence or loss of their land or jobs).	Lack of accountability among labour contractors (i.e. no expectations; no standards).	<ul style="list-style-type: none"> Assess labour contractors or middle management (supervisors/ foremen), including their compliance with the local laws and regulations; Engage with credible, legally registered labour brokers and recruitment agencies and eliminate the poor performing labour contractors; Limit the number of labour brokers and agents to work with to improve the control and oversight over them; and/or Establish a contract (terms and conditions) with the labour contractors to require the implementation of the fair standards/ practices. 	<ul style="list-style-type: none"> Labour contractor assessment criteria are identified/ developed and implemented. Reliable and credible labour contractors are identified and engaged (and terminated relationships with poor-performing labour contractors). Minimum standards on fair labour practices are established and implemented. 	Medium to long Medium to long Medium to long
	Lack of knowledge of fair labour practices/ standards.	<ul style="list-style-type: none"> Train and educate labour contractors and/or supervisors and foremen about the fair labour standards/ practices; Prepare a longer term workforce plan so that workers' contract periods can be respected; and/or Inquire about and request a sample of labour practices such as employment contracts and other documentation to provide support and feedback to improve their labour practices. 	<ul style="list-style-type: none"> The revised/ new contracts with labour contractors are implemented and the performance is monitored. Examples of labour practices are shared, and the improvements are discussed and planned. The long-term planning for workforce is discussed and implemented. 	Short to medium Short to medium Short to medium
	Lack of respects for workers' human needs and their customs, cultures and social norms.	<ul style="list-style-type: none"> Get the management of plantations and mills to know about workers/ introduce workers to the management of plantations and mills; Provide access to a grievance system; Establish a clear policy and process for undocumented workers if such workers are identified; and/or Train the middle management (supervisors and foremen) to be sensitive and cognisant about the issues brought to them by the workers and about the grievance handling procedures (i.e. what process to follow with workers and how to escalate the issues). 	<ul style="list-style-type: none"> A clear policy and process for undocumented workers were established and became effective. Middle management (supervisors and foremen) were trained. 	Medium Medium

Avoiding repetition of grievances – for actors upstream

Grievances related to labour issues can be difficult to address because the underlying root causes are often systemic problems that will not change as a consequence of resolving one case. This means that alongside individual grievance remediation, the grievance holder should learn and incorporate measures that can change the root causes that have led to any harm that has occurred. This could involve a range of measures that cover the company's direct operations and also for monitoring and engaging with service providers and Fresh Fruit Bunch (FFB) suppliers. Undertaking the following activities can go a long way towards avoiding the risk of a future labour-related grievance:

- **Understand the laws in your country of operation, your buyers' requirements and the ILO standards.** These can be different and best practice is to comply with the maximum requirements.
- **Conduct a risk assessment of potential human rights risks and assessment of actual impacts of your operations.** The United Nations Guiding Principles (UNGPs) stipulate the need for assessment of human rights risks and actual human rights impacts to people. This can help to understand root-causes to issues and help mitigate potential risks in the future, based on a company's current operations and that of suppliers. It is important to include vulnerable workers.
- **Review and revise company policies.** Ensure that policies relating to human rights are up to date and include strong clear commitments to protect the rights of all workers (including those hired via agencies, those working on site for other service providers, and those working in supplier operations). Gender considerations should be cross-cutting in these policies.
- **Socialise, operationalise and communicate the policies.** For policies to be effective they must be adopted by all levels of management in the various departments of the business and integrated in company management systems through Standard Operating Procedures (SOPs). Workers, including those hired via agencies or for other service providers, should know where to find the policies. These SOPs should be in a language they understand and be familiar with the content. Policies should also be communicated to suppliers and contractors.
- **Establish or strengthen procedures for concerns to be raised via a grievance system.** It is important for all companies to have an effective and systematic grievance mechanism which is accessible and functional for all workers and others who may wish to raise a grievance.
 - It should be trusted by those who may raise a grievance. This gives the process **legitimacy**;
 - Consulting stakeholder groups through **meaningful engagement and dialogue** is the best approach;
 - It should be clearly communicated so that grievances can be raised by workers, communities, Civil Society Organisations (CSO) and others. This makes the process **accessible**;
 - It should provide a clear set of steps around the remediation process and monitor grievance processes. This makes the process **predictable**;
 - Grievance raisers and affected parties should have access to information, advice and expertise necessary to ensure their engagement is fair, informed and respectful. This ensures the process is **equitable**;
 - Grievance raisers and affected parties should be updated regularly throughout the remediation process. Being **transparent** is essential;
 - Remedy should be consistent with international best-practice standards. This makes the process **rights-compatible**;
 - It is necessary to implement any lessons learned and make improvements to the grievance procedure and ensure **continuous learning**.

Further guidance on grievance mechanism design is provided by the UNGPs (**Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy Framework"**).

Guidance for forced labour grievances

- **Develop or review supplier management systems.** Mills that are supplied by independent estates or smallholders have a responsibility to check that their suppliers are respecting the human rights of workers in their operations. Therefore, mills should have measures in place to determine the risks in their supply base, and to pass on and monitor the requirement to identify, protect and remedy any labour rights issues to their suppliers.
- **Engage consistently with other actors to address systemic issues.** Tackling systemic challenges related to human rights can require joint efforts and shared responsibility among downstream buyers, producers across different sectors, governments, local communities and civil society organisations. Participating in broader initiatives to address root-causes will also likely reduce the cost to individual companies of trying to address issues.

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