

Guidance for Verification: Supplier Self-Assessment Questionnaire on Human Trafficking and Forced Labour

This guidance aims to support your verification of the responses provided by suppliers in the attached self-assessment questionnaire. For each question, we provide suggested methods to help you determine the accuracy and completeness of the supplier's self-assessment. Remember to apply a risk-based approach, focusing your efforts where potential inaccuracies could indicate higher risks of human trafficking and forced labour in the supply chain.

Basic Questions: Verification Guidance

These questions cover fundamental commitments and initial steps.

1. Policy Prohibiting Forced Labour and Child Labour:

- a. **Not Implemented:** Request the supplier to provide their Code of Conduct or any policy documents related to labour practices.
- b. **Basic:** Review the provided Code of Conduct. Look for a clear statement explicitly prohibiting forced labour and child labour within their direct operations.
- c. **Intermediate:** Request the standalone policy document. Verify that it is communicated internally through channels like the company intranet or employee notice boards.
- d. **Advanced:** Review the standalone policy for its comprehensiveness. Ensure it clearly defines forced labour and child labour and outlines the company's commitment to prevention. Check for evidence of internal communication and understanding among employees.

2. Compliance with Applicable Labour Laws:

- a. **Not Implemented:** Ask the supplier for a general statement outlining their commitment to legal compliance.
- b. **Basic:** Obtain a general statement from the supplier confirming their compliance with local labour laws regarding wages, working hours, and working conditions in their direct operations.

- c. **Intermediate:** Request documentation that outlines the processes the supplier has in place to monitor their compliance with these laws. This could include checklists or internal audit schedules.
- d. **Advanced:** Request records of internal or external legal compliance audits or reviews conducted within the past year.

3. **Ensuring Payment of at Least the Legal Minimum Wage:**

- a. **Not Implemented:** Ask the supplier to describe their wage payment practices.
- b. **Basic:** Obtain a statement from the supplier confirming that all employees in their direct operations are paid at least the legally mandated minimum wage.
- c. **Intermediate:** Review a sample of anonymized wage slips for different categories of workers to confirm that the base pay meets or exceeds the legal minimum wage.
- d. **Advanced:** Request payroll summaries or reports that demonstrate consistent compliance with minimum wage laws and also consider industry standards or local living wage benchmarks.

4. **Providing a Safe and Healthy Working Environment:**

- a. **Not Implemented:** During a site visit, observe the basic safety provisions in the workplace.
- b. **Basic:** During a site visit, observe if basic health and safety regulations appear to be followed in the direct operations.
- c. **Intermediate:** Request a copy of the supplier's documented health and safety management system.
- d. **Advanced:** Review records of recent risk assessments conducted in the workplace and any records of safety training provided to employees.

5. **Allowing Workers to Express Concerns or Grievances:**

- a. **Not Implemented:** Ask management how workers can express concerns.
- b. **Basic:** Inquire with management about any informal ways in which workers can express concerns related to working conditions.
- c. **Intermediate:** Request details about the formal grievance mechanism that the supplier has in place. Verify how this mechanism is communicated to employees.
- d. **Advanced:** Review records (anonymized if necessary) of grievances filed by workers and the outcomes or resolutions.

6. **Awareness of Recruitment Fees:**

- a. **Not Implemented:** Ask about their recruitment process for direct employees.
- b. **Basic:** Obtain a statement from the supplier confirming their awareness of the issue of recruitment fees being charged to workers.
- c. **Intermediate:** Review the supplier's policy on recruitment. Check if it explicitly states that workers are not charged recruitment fees.
- d. **Advanced:** If the supplier uses recruitment agencies, review contracts with these agencies to ensure that the supplier bears all recruitment-related costs.

7. **Refraining from Retaining Identification Papers or Requiring Deposits:**

- a. **Not Implemented:** Ask about their procedures for handling employee documentation.
- b. **Basic:** Obtain a statement from the supplier confirming that they generally do not retain original identification papers or require deposits.
- c. **Intermediate:** Request a copy of the supplier's HR policy regarding employee documentation and the handling of identification papers.
- d. **Advanced:** During confidential worker interviews, ask workers if they are in possession of their original identification documents and if they were required to pay any deposits as a condition of employment.

8. **Compliance with Legal Limits on Working Hours:**

- a. **Not Implemented:** Ask about their standard working hours and overtime practices.
- b. **Basic:** Obtain a statement from the supplier confirming their general compliance with applicable legal limits on daily and weekly working hours for their direct employees.
- c. **Intermediate:** Request documentation outlining the processes the supplier has in place to track the working hours of their direct employees, including overtime.
- d. **Advanced:** Review timekeeping records (e.g., timesheets, electronic logs) for a sample of employees to verify compliance with legal limits on working hours.

9. **Commitment Not to Use Prison Labour:**

- a. **Not Implemented:** Ask for their stance on the use of prison labour.
- b. **Basic:** Review the supplier's general company policies or obtain a statement from management confirming their commitment not to use prison labour in their direct operations.

- c. **Intermediate:** Check if this commitment is explicitly included in the supplier's Code of Conduct or other relevant policies.
- d. **Advanced:** Inquire about any due diligence processes the supplier undertakes to ensure that prison labour is not used in their direct operations.

10. Ensuring Understanding of Employment Contracts:

- a. **Not Implemented:** Ask how employment terms are communicated to employees.
- b. **Basic:** Confirm that written employment contracts are provided in the local language.
- c. **Intermediate:** Inquire about the supplier's efforts to explain the terms of employment contracts to employees, particularly those who may not be fluent in the local language.
- d. **Advanced:** Review the supplier's formal process for ensuring that all employees fully understand their contract terms. This may include providing translations, verbal explanations, or training sessions.

11. System to Verify and Document Age of Workers:

- a. **Not Implemented:** Ask about their hiring procedures.
- b. **Basic:** Confirm that the supplier keeps records of employee names and ages.
- c. **Intermediate:** Check the documentation used for age verification during the hiring process (e.g., types of identification documents checked).
- d. **Advanced:** Review the supplier's systematic process for verifying and documenting the age of all new hires. This may include retaining copies of identification documents (ensuring compliance with data privacy regulations).

Intermediate Questions: Verification Guidance

These questions explore more formal implementation and monitoring processes.

1. Conducting Basic Risk Assessments of Direct Suppliers:

- a. **Not Implemented:** Ask about their awareness of potential risks in their supply chain.
- b. **Basic:** Inquire if the supplier has a general awareness of potential risks of forced labour and human trafficking within their supply chain.
- c. **Intermediate:** Request copies of any basic risk assessment questionnaires or templates used to assess their direct suppliers.

- d. **Advanced:** Review the supplier's documented process for identifying and assessing risks of forced labour and human trafficking in their direct supply chain.

2. **Defined Process for Reporting Concerns:**

- a. **Not Implemented:** Ask if there are ways for employees to report concerns.
- b. **Basic:** Confirm that employees can report concerns to their supervisors or management.
- c. **Intermediate:** Request details of the defined process for employees to report concerns or suspicions of human trafficking and/or forced labour. Verify how this process is communicated to employees.
- d. **Advanced:** Review the supplier's documented reporting process, ensuring it includes provisions for confidentiality and outlines procedures for investigation and follow-up.

3. **Policies and Procedures to Track Working Hours:**

- a. **Not Implemented:** Ask how working hours are tracked.
- b. **Basic:** Confirm if informal methods are used to track working hours.
- c. **Intermediate:** Request copies of the supplier's documented policies and procedures for tracking working hours, including overtime.
- d. **Advanced:** Review the supplier's comprehensive system for tracking and recording all working hours, including overtime. Check if there are regular reviews of this data.

4. **Ensuring Overtime is Voluntary and Compensated:**

- a. **Not Implemented:** Ask about their overtime practices.
- b. **Basic:** Obtain a statement confirming that overtime is generally compensated in accordance with local laws.
- c. **Intermediate:** Review the supplier's policy on overtime, ensuring it explicitly states that overtime work is voluntary and compensated as per legal requirements.
- d. **Advanced:** Inquire about the processes the supplier has in place to ensure the voluntariness of overtime and to monitor working hours to prevent excessive overtime.

5. **Agreement to Engage and Cooperate with [UN / UN Organization Name]:**

- a. **Not Implemented:** Ask if they are familiar with the UN and their willingness to cooperate.

- b. **Basic:** Obtain a statement from the supplier indicating their willingness to provide information if requested by [UN / UN Organization Name].
- c. **Intermediate:** Obtain a written statement from the supplier confirming their commitment to cooperating and providing relevant information to [UN / UN Organization Name].
- d. **Advanced:** Confirm if the supplier has a designated contact person or department for engagement with [UN / UN Organization Name].

Advanced Questions: Verification Guidance

These questions explore more sophisticated practices and a higher level of commitment.

1. **Actively Engaging with Workers' Representatives:**

- a. **Basic:** Inquire about their expectations for their own suppliers regarding worker rights.
- b. **Intermediate:** Ask if they communicate their expectations regarding worker rights to their key suppliers.
- c. **Advanced:** Request evidence of active engagement with worker representatives within their own operations (e.g., meeting minutes, agreements). Inquire about how they encourage similar practices in their supply chain.
- d. **Leading/Best Practice:** Review evidence of strong, collaborative relationships with worker representatives and initiatives to actively promote collective bargaining within their supply chain.

2. **Comprehensive Due Diligence Process:**

- a. **Basic:** Confirm their focus on risk management within their direct operations.
- b. **Intermediate:** Review documentation of any risk assessments conducted for their direct suppliers.
- c. **Advanced:** Request documentation of their comprehensive due diligence process, including methodologies for risk mapping, supplier assessments, and auditing.
- d. **Leading/Best Practice:** Review evidence of a proactive due diligence process that utilizes data analytics, involves stakeholder engagement, and includes independent assessments of high-risk areas in their supply chain.

3. **Robust Supplier Evaluation Process:**

- a. **Basic:** Inquire if labour standards are considered during supplier selection.
- b. **Intermediate:** Review their supplier code of conduct and check if it includes ethical labour standards.
- c. **Advanced:** Review the documentation of their supplier evaluation process, ensuring it includes a thorough assessment of adherence to ethical labour standards through questionnaires, audits, and contractual obligations.
- d. **Leading/Best Practice:** Review evidence of the integration of rigorous ethical labour standards into their supplier selection and onboarding processes. Check for initiatives to provide support and incentivize strong performance among suppliers.

4. **Regular Audits of Key Suppliers:**

- a. **Basic:** Confirm if they rely on contractual agreements with suppliers regarding ethical standards.
- b. **Intermediate:** Check if they use self-assessment questionnaires to assess their suppliers' ethical standards.
- c. **Advanced:** Request a schedule of audits conducted on their key suppliers and review summary reports of these audits.
- d. **Leading/Best Practice:** Review their audit program, ensuring it is risk-based, includes unannounced audits where appropriate, and focuses on continuous improvement.

5. **Systematic Management Review Process:**

- a. **Basic:** Inquire if policies are reviewed occasionally.
- b. **Intermediate:** Confirm if periodic reviews of policies and procedures are conducted.
- c. **Advanced:** Review documentation of their systematic management review process, including the setting of targets for improvement in preventing human trafficking and forced labour.
- d. **Leading/Best Practice:** Review evidence that their review process includes ambitious targets, involves senior leadership, and results in measurable and communicated progress.

6. **Integration of International Standards:**

- a. **Basic:** Confirm their awareness of the UN Supplier Code of Conduct and other relevant international standards.
- b. **Intermediate:** Confirm if they have reviewed these standards.

- c. **Advanced:** Review how the principles of these standards are integrated into their company policies and operational practices.
- d. **Leading/Best Practice:** Review evidence of their active promotion and advocacy for the adoption of these international standards throughout their industry and supply chain.

7. **Comprehensive and Regular Training:**

- a. **Basic:** Confirm if any specific training on human trafficking and forced labour is provided.
- b. **Intermediate:** Confirm if basic awareness training is provided to relevant employees.
- c. **Advanced:** Review the content and schedule of training programs provided to relevant personnel, including management and procurement teams. Inquire about training extending to their supply chain where feasible.
- d. **Leading/Best Practice:** Review evidence that their training programs are interactive, regularly updated with the latest information, and that they track the effectiveness of their training initiatives.

8. **System to Monitor and Manage Working Hours Across Supply Chain:**

- a. **Not Implemented:** Verify if they monitor working hours in their direct operations.
- b. **Basic:** Confirm monitoring in direct operations.
- c. **Intermediate:** Verify if they request working hour information from key suppliers.
- d. **Advanced:** Review the system they have in place to monitor and manage working hours in their direct operations and key suppliers, including mechanisms to address excessive overtime.

9. **Established Maximum Working Hour Limits Beyond Legal Requirements:**

- a. **Not Implemented:** Confirm adherence to legal limits.
- b. **Basic:** Confirm adherence to legal limits.
- c. **Intermediate:** Inquire if they aim to keep working hours within reasonable limits beyond legal requirements.
- d. **Advanced:** Review documentation establishing maximum working hour limits (including overtime) that are stricter than legal requirements and how they monitor compliance.

Remember to tailor your verification methods to the specific responses provided by the supplier and to utilize a combination of document review, interviews, and site observations where possible for a more comprehensive assessment.