

Guide for Conducting a Social Audit: Preventing Human Trafficking and Forced Labour

This guide provides step-by-step instructions for auditors using the detailed Social Audit Template to assess a supplier's policies, procedures, and practices related to preventing human trafficking and forced labour. The guide is a framework for conducting a social audit using the provided template. Remember to adapt the process and specific questions to the unique context of each supplier and the specific requirements of your project or tender.

Phase 1: Preparation and Planning

1. **Review Audit Purpose and Scope:** Understand the objectives of the audit, the specific areas to be covered, and any particular requirements from your agency.
2. **Gather Background Information:** Review the supplier's completed Self-Assessment Questionnaire, any previous audit reports, and relevant policies provided beforehand.
3. **Develop an Audit Plan:** Create a detailed audit plan, including the audit timeline, schedule of activities (document review, interviews, site observation), and roles and responsibilities of the audit team. Share the plan with the supplier in advance.
4. **Prepare Audit Tools:** Ensure you have the detailed Social Audit Template, interview questionnaires (for both workers and management), note-taking materials, and any other necessary resources.
5. **Understand Compliance Criteria:** Thoroughly familiarize yourself with relevant labour laws, international standards, and the supplier's

commitments.

6. **Safety and security of audit team:** Consider having at least two auditors (a lead auditor and supporting auditor) especially in high-risk contexts, and take note of the safety and security guidance provided.

Phase 2: On-Site Audit Execution

1. **Opening Meeting:** Conduct an opening meeting with the supplier's management team to introduce the audit team, reiterate the audit purpose and scope, confirm the audit plan, and establish communication protocols.
2. **Document Review:** Systematically review all relevant documents listed in the "Documents Reviewed" section of the template. Take detailed notes and record document references in the "Evidence" column of the Audit Checklist. Pay close attention to policies, procedures, contracts, and records related to recruitment, wages, working hours, freedom of movement, and grievance mechanisms.
3. **Site Observation:** Conduct a thorough tour of the supplier's facilities, including production areas, dormitories (if applicable), canteen, and any other relevant areas. Use the "Site Observation Checklist" in the template as a guide. Document your observations in the "Auditor Observations" column, noting any potential indicators of forced labour or human trafficking risks.
4. **Worker Interviews:** Conduct confidential interviews with a representative sample of workers. Ensure interviews are held in a private setting and in a language the workers understand. Use pre-prepared interview questions focusing on key areas such as:
 - **Freedom of Movement:** Are workers free to leave the workplace after their standard workday? Are there any restrictions on their movement within the facility?
 - **Recruitment Process:** Were workers required to pay any recruitment fees

or costs to secure their employment? Were they provided with clear information about their terms of employment before starting work?

- **Retention of Documents:** Are workers in possession of their original identification documents? Has the employer or any agent retained their IDs?
- **Voluntariness of Work:** Did workers enter into employment voluntarily? Are they free to terminate their employment with reasonable notice? Are there any penalties for leaving?
- **Wages and Benefits:** Are workers paid regularly and in accordance with the law? Do they receive all legally mandated benefits? Are there any unauthorized deductions from their wages?
- **Working Hours and Overtime:** Are working hours within legal limits? Is overtime voluntary and properly compensated?
- **Grievance Mechanisms:** Are workers aware of any grievance mechanisms (either supplier or project-specific)? Do they feel safe to report concerns without fear of retaliation? Verify the procedure for recording and handling grievances within the organisation.
- **Working Conditions:** Are working conditions safe and healthy? Is there any evidence of coercion, intimidation, or harassment? Record key findings from worker interviews in the "Auditor Observations" and "Worker Interviews (Summary of Key Findings)" sections of the template, ensuring the anonymity of interviewees.

5. **Management Interviews:** Interview management personnel from relevant departments (e.g., HR, Operations, Compliance). Ask questions to understand their understanding of policies and procedures, their role in preventing forced labour and human trafficking, and how these are implemented and monitored. Record key information in the "Auditor Observations" and "Management Interviews (Summary of Key Findings)" sections.

6. **Data Analysis and Findings:** Based on the document review, site observations, and interviews, analyze the collected data against the compliance criteria (e.g. relevant laws, supplier commitments). Record your

findings (Compliant/Non-Compliant) and the corresponding evidence in the "Findings" and "Evidence" columns of the Audit Checklist. Identify any non-compliances.

7. **Closing Meeting:** Conduct a closing meeting with the supplier's management team to present the preliminary audit findings, highlighting areas of compliance and any identified non-compliances. Discuss potential corrective actions and timelines.

Phase 3: Reporting and Follow-up

1. **Prepare Audit Report:** Develop a comprehensive audit report based on the template, including:
 - Executive Summary of findings.
 - Detailed findings for each audit question, including evidence and compliance status.
 - Summary of worker and management interviews.
 - Overall conclusion on the supplier's compliance.
 - Specific recommendations for corrective actions for any identified non-compliances.
 - Agreed-upon timelines for correction.
2. **Submit Audit Report:** Submit the final audit report to [Your Agency] and the supplier.
 - **Reporting critical legal/regulatory issues:** Reporting might be needed depending on what is found in the audit. This could be done internally or externally. Check your agency's procedure for addressing legal and regulatory issues related to suppliers.
3. **Corrective Action Plan:** Work with the supplier to develop a detailed corrective action plan to address all identified non-compliances within the agreed timelines.

4. **Follow-up Verification:** Conduct follow-up audits or verification activities (e.g., desk reviews of updated documentation, on-site visits) to assess the implementation and effectiveness of the corrective actions. Document the findings of the follow-up verification in the "Follow-up Verification" column of the template.

Key Considerations for Auditors:

- **Impartiality and Objectivity:** Maintain impartiality and objectivity throughout the audit process.
- **Confidentiality:** Protect the confidentiality of all information gathered during the audit, especially worker interviews.
- **Ethical Conduct:** Adhere to the highest ethical standards in all audit activities.
- **Cultural Sensitivity:** Be mindful of cultural differences and communicate effectively with workers and management.
- **Thoroughness:** Ensure all aspects of the audit scope are covered thoroughly.
- **Evidence-Based Findings:** Base all findings on verifiable evidence.