

Strategy Tool

How are anti-exploitation strategies drafted?

A growing number of businesses are committed to international human rights due diligence and publish annual sustainability reports. Despite this progress, the focus on improving working conditions in local supply chains is often lacking. If a company aims to be competitive, a strategic approach to CSR is increasingly important. It can positively contribute to safeguarding the rights of migrant workers, risk management, cost savings, investor and customer relationships, human resources management and innovation capacity. This tool is meant to assist companies in defining a clear company strategy on the prevention of labour exploitation and trafficking. It outlines recommendations on how to include this theme in internal guidelines and corporate policies, and how to put the values the new strategy holds into action. The recommendations also include additional materials and guidelines that will help you carry out the strategy. The links to the materials can be found at the end of the tool.

1

Identify and articulate how your company's core values are linked to human rights due diligence and especially to the prevention of labour exploitation, both in your direct employment practices and when using subcontractors. Include them in your company's core strategy and differentiate between immediate and long-term CSR approaches. If your company's value system clashes with responsibilities in the area of human rights, a principles-based approach should be adopted, e.g., one where the prevention of labour exploitation should be considered a priority instead of emphasising cost-efficiency in competitive tendering. Line up the strategy with the regulatory framework of your country and possible codes of conduct on human rights issues applied in your business sector.

→ Use the [Ten Principles of the UN Global Compact and the Risk Assessment Tool on p. 30](#). Use the [UNGP principles 17 to 22 to learn about human rights due diligence](#).

5

Increase staff awareness (managers and supervisory staff in particular) of labour exploitation/human trafficking/forced labour and relevant legislation by: a) learning about and mapping possible vulnerable groups who are most at risk of exploitation in your business sector, b) increasing understanding of the circumstances that increase the risk of exploitation of migrant workers/temporary staff, c) engaging in dialogue and collaboration with authorities, civil society organisations, labour inspectors, employers' associations and trade unions in order to improve collaboration for identifying and reporting possible cases.

→ Use the [HEUNI Guidelines for Businesses and Employers for Risk Management in Subcontracting Chains](#), and the [FLOW-project publications "Shady Business" and "Navigating through your supply chain - A Toolkit for Responsible Businesses"](#)

4

Share your company strategy (and guidelines or corporate policies) for preventing exploitation (ideally face-to-face) with stakeholders, contractors, subcontractors and business partners. Organise regular thematic meetings with your partners in the supply chains and notify them about the risk of labour exploitation. Get to know the people and businesses in your supply chain.

→ Use the [Screening Tool on p. 37](#)

2

Commit in writing to respecting ethical and professional conduct, fundamental principles and rights at work, and combating labour exploitation and trafficking in connection to both direct employment and throughout the whole supply chain. Guarantee in writing that employees are free to enter into employment and to terminate it.

→ Use the [ILO Declaration on Fundamental Principles and Rights at Work](#) and [The UN Guiding Principles on Business and Human Rights](#).

3

Prepare company guidelines by utilising the remaining points of on this strategy tool. Prepare guidelines that specifically aim to prevent exploitation and trafficking in the supply chain and ensure that they are adhered to throughout the supply chain. Incorporate them into all your processes, especially the ones relating to the use of contractors, recruitment, subcontractors and posted workers.

→ Use the [HEUNI Guidelines for Businesses and Employers for Risk Management in Subcontracting Chains](#), p. 16 section A: General Precautions.

6

Commit in writing to empowering and informing migrant workers about their rights at work. Increase awareness of migrant workers by providing information (e.g., leaflets) about what forced labour is and how or whom they can notify about it if they become aware that it is taking place. Notifying workers about their rights at work should be included in the official orientation materials. Information could be distributed/handed out on their first day at work when workers undergo induction, training, etc.

→ Use the **ILO Declaration on Fundamental Principles and Rights at Work** and available informational leaflets by national authorities for foreign employees, and **Workplace Assessment Tool** on p. 46

7

Strengthen and harmonise the monitoring of working conditions among employees and subcontractors through, e.g., a) regular random checks, audits, or workplace assessments, b) establishing an ethical channel/complaint mechanism through which anyone could safely (including anonymously) report their suspicions or issues in working conditions in their own language or in the language they understand and ensure that the complaints are responded to effectively and timely, and c) making sure that your company provides informal opportunities for employees to discuss their working conditions.

→ Use the **Workplace Assessment Tool** on p. 46

8

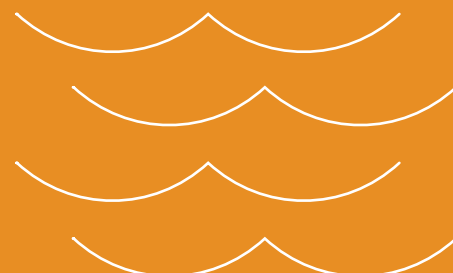
Establish clear procedures for different job levels for dealing with situations in which a) the company or authorities have detected a breach of contract, b) in the event of signs of labour exploitation and/or trafficking, c) company personnel receive a complaint or tip about labour exploitation or trafficking.

→ Use the **HEUNI Guidelines for Businesses and Employers**, p. 22–25 and see p. 55 “When suspicions arise”

9

Monitor the implementation of codes of conduct and your anti-exploitation strategy. Evaluate your company’s performance in relation to the strategy and include information about it in your annual reports

→ Use the **UN Guiding Principles Reporting Framework**



Further reading and useful links:

ILO Declaration on Fundamental Principles and Rights at Work (1998): <https://www.ilo.org/declaration/lang--en/index.htm>

The United Nations Global Compact: <https://www.unglobalcompact.org/>

The UN Global Compact – Ten Principles: <https://www.unglobalcompact.org/what-is-gc/mission/principles>

Guide to Corporate Sustainability based on the UN Global Compact: <https://www.unglobalcompact.org/library/1151>

The United Nations Guiding Principles (UNGPs): https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

The UN Guiding Principles Reporting Framework: <https://www.ungpreporting.org/>

HEUNI Guidelines for businesses and employers for risk management in subcontracting chains (2018): https://www.heuni.fi/en/index/publications/heunireports/HEUNI_report_88c.html

The FLOW-Project publication “Shady Business: Uncovering the business model of labour exploitation”: https://www.heuni.fi/en/index/researchareas/humantrafficking/flow_thb.html

Institute for Human Rights and Business (IHRB): The Employer Pays Principle – Responsible Recruitment: <https://www.ihrb.org/employerpays/the-employer-pays-principle>

Toolkit for economic sectors to combat human trafficking: https://csd.bg/fileadmin/user_upload/publications_library/files/2019_08/Toolkit_EN.pdf

Toolkits for reducing modern slavery: <https://www.stronger2gether.org/resources/>



Part of the report by Lietonen, A., Jokinen, A. & Ollus, N. (2020): Navigating through your supply chain. Toolkit for prevention of labour exploitation and trafficking. Helsinki: HEUNI. Full publication available [here](#).



Published within the EU-funded project “FLOW. Flows of illicit funds and victims of human trafficking: uncovering the complexities”. This project was funded by the European Union’s Internal Security Fund — Police. The content of the project outputs represents the views of the author only and is his/her sole responsibility. The European Commission does not accept any responsibility for use that may be made of the information it contains.