

# Ethical recruitment roadmap: guidelines

Based on the successes and challenges found in Impactt's evaluation and its experience with other companies working to improve their recruitment of migrant

workers, we have identified the following guidelines for organisations seeking to develop a fair and transparent recruitment process.

## Take Action

- **Get buy-in from the top:** The backing of the CEO, Board, Procurement, Human Resources, and Sustainability teams is decisive in designing and implementing an ethical recruitment process.
- **Start with understanding the current reality:** A clear-sighted mapping of the worker's recruitment journey is a necessary first step. Work with local civil society organisations, and engage with recruitment agencies and government officials to understand the true costs of recruitment. Remember that this will differ by recruitment corridor.
- **Assess gaps:** Understand how workers' experiences and your current practices align with your standards and international standards.<sup>21</sup>
- **Create a policy:** Develop and publish a clear policy on ethical recruitment. Include the policy as a contractual requirement in agreements with recruitment agencies and ensure that agencies understand its purpose, as well as its specific requirements.
- **Establish clear responsibilities:** Ensure that internal stakeholders (for example, individuals within the HR, procurement and production functions) and external stakeholders (recruitment agencies, sub-agencies, civil society organisations, service providers) know exactly what role they must play in delivering the policy.
- **Cascade through to sub-agency level:** Restrict and monitor recruitment agencies' use of sub-agencies. Engage with approved sub-agencies to communicate the aims and purposes of the ethical recruitment commitment.
- **Ensure clear lines of accountability:** Clarify, through policies, contracts and regular communication, the consequences of breaches. This should include responsibility for the reimbursement of recruitment fees, and contract termination in the case of failure to comply with the policy. Work with independent, worker-focused third parties to ensure that external accountability is built into the process. Create open channels for feedback with civil society organisations to inform continuous improvement.
- **Engage with workers:** Build meaningful worker engagement into the ethical recruitment process. Workers themselves are the best monitors of how they are treated. Work with local civil society organisations with expertise in worker dialogue and connections to relevant worker communities.
- **Communicate clearly to workers:** Throughout recruitment, employment, and resignation processes communicate clearly and frequently to workers on their rights. Ensure workers are aware of what to expect in their new jobs and lives in their new country of residence. Explain thoroughly the role and responsibilities of any third party partners especially grievance mechanism providers and what to do if any issues arise.
- **Ensure robust monitoring, investigation and remediation:** Work with independent local civil society organisations to help encourage the strongest monitoring procedures. Providing multiple check-points for workers with independent civil society partners during the process (e.g. interviews both before departure and after arrival) helps to uncover issues more effectively. Ensure there is high-level company commitment to follow through with full remediation, including financial remedy, for any workers who have experienced a breach of the policy.
- **Embrace continuous improvement:** Create practical policies informed by workers' feedback and concerns, and regularly revisit and adapt them. Be open to criticism. Understand what went wrong and why, and how to prevent the issue from reoccurring.
- **Share knowledge:** Capture and communicate what works and what doesn't, in order to help other businesses.

<sup>21</sup> See, for example, the Dhaka Principles, the Responsible Business Alliance definition of recruitment fees, or the IRIS standard of the IOM.

## Commit to Continuous Improvement

- **Focus on taking action, not perfection:** Putting the principles of ethical recruitment into practice is not easy. There will be bumps in the road. Acknowledge progress, even if it falls short of perfection, and continue your journey of continuous improvement.
- **Do not be daunted by what you might find:** Forming an understanding of the harsh realities facing migrant workers in their journey to find work can be alarming. But, it is ultimately better to understand the full picture so that you can manage operational, reputational and legal risks.
- **Keep the labour supply chain simple:** Each link in the chain increases the risk of policy breaches. Manage recruitment as directly as possible.
- **Give recruitment time:** Following the full ethical recruitment process takes time. Ensure agents are not tempted to cut corners in order to meet unrealistic timelines.
- **Consider the whole worker experience:** Recruitment is only the first step in the worker journey. The worker's experience while in employment, to what extent the job contributes to his or her life goals and his or her confidence to resign and return home are all crucial to the success of ethical migration for work.
- **Challenge corruption:** Don't shy away from calling out corruption and kick-backs. Build internal safeguards and a culture of speaking out about corruption, whether internal or in governments in source or host countries.
- **Start with the areas you can control:** Many aspects of the recruitment process are within an employer's sphere of influence. Focus here.

### The roles of other actors

Companies can take significant action to enable ethical recruitment through their own practices, but all stakeholders must contribute to building an ethical recruitment system.

- **Governments**, both in source and host countries, are responsible for ensuring that migrating citizens and arriving migrant workers receive adequate protection from abuse throughout their recruitment, travel and employment, and on their return. This includes establishing legal frameworks aligned with ethical recruitment and robust enforcement mechanisms with effective grievance channels. Governments can also create an enabling environment by cracking down on corruption and providing transparent and public information on visa, permit and passport costs and processing times.
- **Buyers**, such as international retailers, influence the raising of standards across global supply chains through implementation of their Codes of Conduct and supplier standards. They have the opportunity to stimulate demand for ethical recruitment by providing incentives to suppliers who are able to demonstrate responsible recruitment practices. Buyers should evaluate their purchasing practices to ensure that they do not prompt behaviours that increase the risk of exploitation or create a conflict of interest for suppliers. For example, accurate forecasting with suppliers and assessment of suppliers' capacity can enable brands to avoid placing excess pressure on suppliers.<sup>22</sup> They should prioritise developing purchasing practices that are designed from the outset to encourage ethical behaviour, including on recruitment.
- **Civil society, including NGOs and trade unions** are key to identifying the issues faced by workers, representing the interests of migrant workers, and providing support to affected people. They also have a central role in providing independent oversight and ensuring accountability.

<sup>22</sup> For further guidance and resources, see for example Better Buying at <https://betterbuying.org/> and the Joint Ethical Trading Initiatives' Guide to Buying Responsibly: [https://www.ethicaltrade.org/sites/default/files/shared\\_resources/guide\\_to\\_buying\\_responsibly.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/guide_to_buying_responsibly.pdf)