

Ethical Recruitment: Translating Policy into Practice

An Assessment of Thai Union's Ethical Migrant Recruitment Policy Implementation

Background

- Global seafood producer [Thai Union](#) (TU), the world's largest producer of shelf-stable tuna products, began implementing its Ethical Migrant Recruitment Policy in 2016. Although addressing forced labor risks involved in the recruitment of international migrant workers is a priority for companies, governments, and NGOs, there have been few attempts to rigorously translate policy into practice.
- In order to understand the successes and challenges of TU's efforts, [Humanity United](#) and [The Freedom Fund](#) commissioned Impactt (an ethical trade consultancy) to conduct an independent evaluation of Thai Union's pilot implementation of the Policy. This report, *Ethical Recruitment: Translating Policy into Practice*, summarizes the findings of this evaluation and provides a set of guidelines for companies keen to improve their migrant recruitment practices.

The Problem + The Policy

- Migrant workers are vulnerable to exploitation from the moment they begin the recruitment process, throughout their employment in another country, to the time when they return to their country of origin. Many of the biggest risks for forced labor arise during the recruitment process.
- When workers are asked to pay high fees by recruitment agents or brokers, many go into debt and end up in debt-bondage (a type of forced labor). Too often, this situation is compounded by confiscation of workers' passports and low pay, which combine to trap workers in bonded labor.
- Thai Union (TU) has worked to tackle these issues in its seafood processing factories in Thailand through implementation of its Ethical Migrant Recruitment Policy.
- The Policy provides a set of principles aiming to ensure that recruitment and hiring are managed consistently, professionally, fairly, and transparently. It aims to ensure safe migration, reduce the potential vulnerability of migrant workers to labor exploitation, and significantly reduce the costs paid by workers during the recruitment processes.
- The Policy also requires agencies to be fully transparent on costs and disclose all charges and terms of business.

Impact of the Policy

- TU's model significantly reduced fees paid by the majority of workers.
 - Under the TU model workers paid an average of \$127 USD, while research from the same time period cites an average recruitment cost to workers of \$413 to \$523 USD.
- All workers recruited under the Policy reported that they felt safe during their recruitment journey.
 - This is notable in the context of the Myanmar-Thai recruitment corridor where many workers face high-risk recruitment journeys, particularly if they are not following legal/formal recruitment channels.
- TU workers recruited under the Policy reported higher job satisfaction levels. They were:
 - 11% more likely to recommend the factory as a good place to work
 - 39% more likely to save each month

- 22% more likely to reach the end of the month without borrowing money, compared to other TU workers recruited before the Policy was introduced.
- TU reports a number of benefits for its own business, including:
 - It is now easier to recruit workers - when the company issues a demand letter for workers from Myanmar to recruitment agencies, it now receives more applicants than required.
 - It is now easier to fulfil the requirements of customers' social compliance audits.
 - All TU customers — which include major brands and retailers — interviewed reported that they view the elimination of recruitment fees as a priority area. However, they still observe few suppliers systematically addressing the problem, and therefore welcomed TU's efforts.

Learning from the TU's Policy: Takeaways for Other Companies to Improve Migrant Recruitment Practices

- TU's model translates policy commitments to ethical recruitment into practice and provides a case study for other companies on how to improve ethical recruitment.
- TU prepared and implemented their ethical recruitment policy in conjunction with a migrant worker-led civil society organization. Workers themselves are the best monitors of how they are treated, and partnering with a third-party, worker-centric organization ensures more honest feedback from workers and better verification of the effectiveness of reforms.
- Challenges were encountered along the way: some workers paid more than the limit identified in the policy, but in most cases only slightly more. In cases where workers paid unauthorized recruitment costs, it was investigated and a remediation process was undertaken. The process wasn't always easy for workers and TU, especially if there was a lack of documentary evidence. Ensuring migrant workers feel confident to raise an issue was also a challenge — to continue to improve on this TU could ensure more one to one time between the civil society organization and recruits.
- Despite the challenges, the TU model marks a significant landmark in improving migrant recruitment practices. TU identified problems in their recruitment process and made efforts to remediate issues and put measures in place to guard against further violations. Their efforts demonstrate that meaningful progress can be made when a corporation takes action and commits to a model of continuous improvement.
- All stakeholders must be part of the solution (i.e. government, peer businesses, buyers/retailers, agencies, workers, CSOs) - this is an ecosystem problem and will need an ecosystem of partners to solve it.
- Corporations and suppliers should spend time understanding their recruitment process, rather than distancing themselves from the issue because they are afraid of what they'll find. Plausible deniability is over, and it is no longer possible to reasonably claim that it can't be done.
- Most importantly: retailers and brands should recognize the increased cost of doing business that comes with increased oversight and management of a company's recruitment practices. They must reward and incentivize suppliers demonstrating true commitment to putting policy into action, rather than continuing to use price/cost as the primary driver of sourcing decisions. Without this, nothing fundamentally will change.