

Responsible Recruitment: A Practical Guide for Suppliers

Recruitment is not just a Human Resource activity. It is a core business function that directly affects productivity, costs, workforce stability, and customer relationships.



READING TIME

~12 minutes

DOCUMENT

Full text + self-assessment

INCLUDES

Scenarios · Lifecycle

WHY RESPONSIBLE RECRUITMENT MATTERS FOR YOUR BUSINESS

1 Recruitment is a core business function — not just an HR task

Recruitment is not just a Human Resource activity — it is a core business function that directly affects productivity, costs, workforce stability, and customer relationships. In many sectors, recruitment challenges are intensifying due to labour shortages, rising costs, increased buyer scrutiny, and growing regulatory expectations related to forced labour.

At the same time, recruitment is one of the most common ways forced labour risks enter supply chains, often *before* workers arrive at the workplace. When recruitment risks are not well understood or managed, suppliers may face high turnover, operational disruption, audit findings, or loss of business — even when issues originate outside their direct control.

Responsible recruitment helps you get ahead of these risks. It allows you to understand where vulnerabilities exist, take targeted action, and demonstrate credible management of recruitment practices rather than reacting under pressure from audits, buyers, or regulators.

From a worker's perspective, responsible recruitment reduces debt, deception, and uncertainty. Workers who are recruited fairly are more likely to stay, perform well, and raise concerns before problems escalate. Research and field experience show that fair recruitment practices are closely linked to lower turnover, fewer disputes, and more stable operations.

From a business perspective, recruitment-related problems can quickly translate into:

- High worker turnover and absenteeism
- Disruptions during peak production or harvest periods
- Audit non-compliances, corrective action demands, or loss of orders
- Reputational damage that is costly and time-consuming to address

Understanding recruitment risks — and knowing where your business stands — allows suppliers to get ahead of these challenges. Rather than viewing responsible recruitment as a compliance burden, many suppliers are beginning to use it to strengthen buyer trust, stabilise their workforce, and differentiate themselves in competitive markets.

RESPONSIBLE RECRUITMENT IS A BUSINESS ADVANTAGE

Suppliers that invest early in responsible recruitment are often better prepared for audits, more resilient during labour shortages, and more attractive to both customers and workers.

WHAT IS RESPONSIBLE RECRUITMENT

2 Fair, transparent, and voluntary — from start to finish

Responsible recruitment means that workers are recruited and hired fairly, transparently, and voluntarily, without paying fees or being subjected to deception or coercion. Recruitment should be understood broadly — covering how workers are informed, selected, transported, placed into employment, and, where relevant, supported to return home. These principles apply whether recruitment is conducted directly by the employer or through third-party labour agents.

Responsible recruitment is grounded in internationally recognised standards and guidelines. Click any link below to learn more:

- [ILO Forced Labour Convention No. 29 and Protocol](#)
- [ILO General Principles and Operational Guidelines for Fair Recruitment](#)
- [IOM International Recruitment Integrity System \(IRIS\)](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)

At the centre of responsible recruitment is the **Employer Pays Principle (EPP)**.

THE EMPLOYER PAYS PRINCIPLE (EPP)

Is an employer's voluntary commitment to pay the full costs associated with recruitment. It means that workers should not pay any fees or costs to secure employment — whether charged directly by an employer or indirectly by a labour agent. If a worker pays a fee at any stage of recruitment, this is a clear indicator of forced labour risk.

- EPP covers placement fees, pre-departure training, required medical examinations, visas and work permits, and transportation to the place of work.
- EPP is widely recognised and promoted by leading international organisations including the ILO and IOM, and is increasingly adopted by companies across a range of industry sectors and locations.

Responsible recruitment is also often a legal requirement. In many countries, it is illegal for workers to pay recruitment fees, or the amount may be capped by law. Other deceptive practices like false job advertisements, passport retention, or employing workers without visas or work permits may also be illegal in your country.

But even if responsible recruitment isn't required by the law of your country, it is often a requirement expected by top international buyers, brands, and companies. As a supplier, you will be expected to comply with international standards — including the **Employer Pays Principle** — even if it is not a legal requirement.

HOW RECRUITMENT-RELATED FORCED LABOUR RISKS SHOW UP IN YOUR BUSINESS

3 Risks that develop through routine business decisions

Recruitment-related forced labour risks rarely appear suddenly or intentionally. More often, they develop through routine business decisions such as how quickly workers need to be hired, who is responsible for recruitment, and how much visibility management has over recruitment practices. Because many recruitment activities happen before workers arrive on site, risks can be easy to miss. Yet their impact is often felt directly in operations.

Worker-paid recruitment fees

Worker-paid recruitment fees are one of the most serious and well-documented drivers of forced labour. When workers begin employment in debt as a result of recruitment fees, their ability to leave a job freely is often constrained from the outset. This debt can create pressure to accept excessive hours, unsafe conditions, or unlawful deductions, and is widely recognised as a pathway to debt bondage.

In practice, these situations frequently lead to worker harm, disputes, grievances, and abrupt departures — creating significant legal, operational, and reputational risks for suppliers. International guidance is clear that recruitment fees include both *direct and indirect costs*, regardless of where or how they are paid, and may include costs disguised as deposits, loans, or "service charges".

Misalignment between what workers are promised and what they experience

Misalignment between what workers are promised and what they experience is another frequent trigger. When recruitment information about wages, hours, job roles, or living conditions is unclear, misleading, or inaccurate, workers may arrive having consented to conditions that do not exist in practice. This undermines informed consent and can create situations where workers feel trapped or deceived. These gaps often surface through grievances, disputes, absenteeism, or audit findings — even when management believes conditions are acceptable. International standards recognise deception during recruitment as a forced labour indicator, even where workers initially agreed to the job.

Recruitment risks when labour agents are used without effective oversight

Recruitment risks increase significantly when labour agents are used without effective oversight. Agents may charge prohibited fees, provide misleading information, or subcontract recruitment in ways that reduce transparency and control. While these practices may occur outside the workplace, international standards are clear that responsibility does not transfer to the agent. When recruitment-related abuses are identified, it is typically the supplier — not the recruiter — that is held accountable by buyers, auditors, and regulators. Understanding where recruitment risks appear in your business is the foundation for effective prevention and gives suppliers more control and flexibility in how issues are addressed.

CORE ELEMENTS OF RESPONSIBLE RECRUITMENT IN PRACTICE

4 Responsible recruitment is a process — not a one-time decision

Responsible recruitment is not a single policy or decision. It is a *process* that runs across the full recruitment lifecycle — from planning and sourcing workers, through hiring and onboarding, to ongoing monitoring once workers are in place. The table below shows responsible recruitment principles at each stage of the lifecycle.

1 Recruitment Planning

Set the foundation by applying the Employer Pays Principle and ensuring recruitment costs are budgeted and not passed on to workers.

- Apply the EPP from the start — budget all recruitment costs
- Set written standards for any agents you use, before hiring begins
- Get management sign-off on recruitment channels and expected costs
- Document your EPP policy so auditors can verify it

2 Worker Sourcing

Know who is recruiting on your behalf, set clear expectations, and monitor agents to ensure workers are not charged fees or misled.

- Know exactly who is recruiting — names, licences, sub-agents
- Prohibit sub-contracting without your written approval
- Verify agents are not charging workers fees at any stage
- Require agents to give workers clear, accurate information about the job

3 Hiring & Contracts

Workers should receive clear, accurate information about job terms — in a language they understand — before accepting employment.

- Provide clear written contracts before workers accept the job
- Contracts must be in a language workers actually understand
- Wages, hours, duties and conditions must match what was advertised
- Never retain identity documents — this is a forced labour indicator

4 Arrival & Onboarding

Confirm that recruitment practices were followed in reality — including no fees paid, no document retention, and no unexpected deductions.

- Conduct confidential interviews on arrival to confirm no fees were paid
- Check that actual conditions match what was promised during recruitment
- Ensure workers understand their rights and how to raise concerns
- Document your checks — this is evidence for future audits

5 Remediation

If problems are identified, address harm to workers and correct the systems that allowed the issue to occur.

- If fees were paid: reimburse workers in full, promptly, with no retaliation
- Engage the agent responsible and demand corrective action
- Inform your buyer and provide a clear corrective action plan
- Document every step taken — transparency builds buyer trust

6 Ongoing Monitoring

Worker feedback and grievance mechanisms help identify recruitment-related issues that may not surface immediately.

- Conduct regular worker surveys and exit interviews — look for patterns
- Track grievances systematically — one complaint may signal a wider issue
- Review agent contracts and practices at least annually
- Update your recruitment process as risks and regulations evolve

Recruitment-related forced labour risks can arise at any stage of the recruitment lifecycle. Managing recruitment as an ongoing process — rather than a one-time event — gives suppliers greater control, reduces disruption, and supports stable, long-term operations.

To do this effectively, it is important to recognise that recruitment compliance cannot be verified through contracts and invoices alone. Worker engagement — including interviews and anonymous feedback — is essential to identifying fees, deception, or coercion that may not be visible on paper.

Understanding where recruitment risks sit across this lifecycle allows suppliers to focus effort where it matters most and take practical, targeted action to prevent forced labour before harm occurs.

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APPLYING RESPONSIBLE RECRUITMENT IN REAL BUSINESS SITUATIONS

What would you do?

Responsible recruitment can feel abstract until it is connected to real operational decisions. The scenarios below are drawn from common situations observed across sectors and regions, including in otherwise well-managed operations. As you read them, consider how similar challenges might appear in your own business.

SCENARIO 1 — Workers have paid recruitment fees without your knowledge

SITUATION

You use a labour agent to recruit migrant workers. During onboarding or through a grievance, workers report that they paid recruitment fees before arrival. You were not aware of this, and the agent explains that the fees were charged by a sub-agent, not by them.

WHAT WOULD YOU DO?

Would you treat this as an issue outside your control? Would you wait for an audit or buyer request before acting?

RESPONSIBLE PRACTICE

You recognise that under the Employer Pays Principle, workers should not pay recruitment fees — regardless of who charged them. You take immediate steps to confirm the fees paid through worker interviews and documentation, reimburse affected workers in full, and ensure there is no retaliation. You engage the agent, require corrective action, strengthen oversight, and adjust recruitment processes to prevent recurrence.



SCENARIO 2 — The job is not what workers were promised

SITUATION

Workers begin leaving shortly after arrival. Exit interviews reveal that wages, overtime, or living conditions are different from what workers were told during recruitment. Supervisors believe conditions are legal and unchanged.

WHAT WOULD YOU DO?

Would you focus only on retention or productivity issues? Would you assume workers misunderstood the job?

RESPONSIBLE PRACTICE

You treat this as a recruitment transparency issue, not just a retention problem. Recruitment materials and verbal promises are reviewed and aligned with actual working conditions. Contracts and onboarding explanations are updated, and recruiters or agents are instructed to provide clear, accurate information — in a language workers understand — before workers accept employment.

WHAT THIS MEANS FOR YOUR BUSINESS

These scenarios show that responsible recruitment is not about avoiding problems entirely. It is about recognizing issues early, taking responsibility even when risks originate outside your workplace, and acting decisively to protect workers and your operations.

Moving from commitment to action

Responsible recruitment is not achieved through policies alone. It depends on how recruitment is planned, managed, monitored, and corrected in practice. For suppliers, the most effective approach is to focus on a small number of high-impact actions and build from there.

The first step is understanding where recruitment risks exist in your business — which recruitment channels you use, which worker groups may be more vulnerable, and where visibility may be limited. From there, recruitment and hiring practices can be strengthened through clear expectations, practical controls, and regular engagement with workers, recruiters, and relevant stakeholders.

Importantly, responsible recruitment is not about getting everything right immediately. Buyers and stakeholders increasingly recognise that risks can exist even in well-managed operations. What matters is whether suppliers can identify issues early, respond appropriately, and demonstrate continuous improvement — particularly where issues originate in recruitment processes outside the workplace.

Remember, taking action on recruitment risks supports your business in practical ways. It helps reduce turnover and disruption, improves worker trust and retention, and strengthens your ability to respond confidently to audits and buyer expectations. In tight labour markets, it also helps position your business as a preferred employer — one that workers want to return to and recommend.

Responsible recruitment should be viewed as an ongoing management process, not a one-time exercise. Suppliers that embed the EPP, maintain effective oversight of recruiters, engage workers meaningfully, and act decisively when issues arise are better positioned to prevent forced labour before harm occurs. Over time, these practices strengthen workforce stability, reduce risk, and build more resilient and competitive businesses.

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SELF-ASSESSMENT

Is your recruitment responsible?

Use this checklist as a starting point to assess where your business stands. Every item you cannot check represents an area to prioritise.

- We apply the Employer Pays Principle and cover all recruitment costs — no fees are passed to workers
- We maintain an approved list of labour agents and monitor them with regular checks
- Workers receive clear, written contracts in a language they understand — before accepting the job
- We conduct onboarding interviews to confirm no fees were paid and conditions match what was promised
- Workers have a safe, confidential channel to raise concerns — without fear of retaliation
- If recruitment issues are found, we have a clear process to investigate and reimburse affected workers

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Further reading: [ILO Forced Labour Convention No. 29](#) · [ILO Fair Recruitment Guidelines](#) · [IOM IRIS](#) · [UN Guiding Principles](#) · [OECD Due Diligence Guidance](#)

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