

RESPONSIBLE RECRUITMENT & MIGRANT WORKERS

**Practical Ways to Strengthen and Demonstrate
Worker Protection**

Responsible recruitment internationally is defined as the **ethical, fair, and transparent process of hiring workers**, ensuring that their rights, dignity, and safety are protected throughout the entire journey from recruitment to employment and, for migrant workers, safe return to their home country.

Designed to prevent and address abuses such as debt bondage, human trafficking, and forced labour by eliminating the "worker-pays" model, where workers are charged fees for securing employment.

Major thrust “Employer Pays” - model

Is this standard legally enshrined in India?

Occupational Safety, Health and Working Conditions (OSH) Code

SECTION 49

49. The contractor shall not charge directly or indirectly, in whole or in part, any fee or commission from the contract labour. No fees or commission or any cost to workers.

- A critical legal safeguard to prevent debt traps.
- Government responsibility of ensuring compliance through inspections - GAP
- But inadequate pathway when recruitments in the informal sector are based on promises, social norms and loyalties.

CII-Centre for Excellence in Sustainable Development guidance document (2020) to businesses - **'Integrating Sustainability into Indian Value chains'** highlights the rise of forced labour, child labour and labour trafficking being the top human rights risk areas for supply chain sustainability in the country - substantiated by risk analysis and audit assessments on the SEDEX platform for supplier companies in India.



A 2022 report by CII-ESD, ‘**Business and Human Rights Landscape in India for Japanese companies**’ points to the material issues of forced labour and child labour in value chains as an India-specific human rights risk under the following four sectors (Automobile/Auto components, Apparel, Electronics and Finance Services).



Business and Human Rights Landscape in India for Japanese Companies

Understanding how India's landscape on Business and Human Rights could impact Japanese companies operating in India

A 2023 report titled '**ESG and Human Rights**' by the legal consulting firm **Nishith Desai Associates** (an International Law firm ranked as the most innovative Indian law firm), also lists the dominant human rights concerns in value chains as:

1. Forced labour, Child Labour and Bonded Labour.
2. Human Trafficking.
3. Unsafe work conditions



Law Enforcement Signals that
demonstrate migrant worker
vulnerability

Six women migrant workers rescued from Karnataka after Jharkhand CM's intervention

Six women migrant workers hailing from Jharkhand were rescued from Karnataka where they were held captive in an apparel unit, the state government said on Thursday.

Updated on: Jan 14, 2022 12:42 AM IST

By Press Trust of India , Ranchi

Governance

Police rescue 51 women being trafficked from Odisha

The women were being taken to Tamil Nadu to work in a garment factory



Karnataka cops rescue 30 illegally confined WB labourers forced to work by gang of eight

The gang lured the labourers, got them to Bengaluru and made them work in a garment factory without pay. The neighbours heard the victims' protest and called the police, who rescued them.



India Today Web Desk ✕

New Delhi, UPDATED: Jan 28, 2022 13:34 IST

Bommanahalli police in Karnataka's Bengaluru rescued 30 labourers from West Bengal who were illegally confined, tortured and forced to work without pay by a gang of eight.

The accused lured the victims to Bengaluru by offering them jobs in a garment factory with a decent salary, food and accommodation. Police suspect that the accused are agents for industries, probably looking for cheap labour.

APPAREL /GARMENT SUBSECTOR

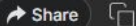
Section 111 of the Bharatiya Nyaya Sanhita (BNS), 2023, defines and penalizes organized crime committed by syndicates or individuals for material/financial gain. It covers activities like kidnapping, extortion, cyber-crimes, and trafficking.

6 Girls, 3 Boys, Working At Noida Factory, Rescued By Police

Police said some of the children had been working in the factory since last six months while a couple of them were there for over one year.

Press Trust of India | [Noida News](#) | Dec 28, 2022 15:13 pm IST 🕒

Read Time: 2 mins



Noida: Nine children, who were illegally employed at a garment factory in Noida, have been rescued by the Anti-Human Trafficking Unit (AHTU) of the Gautam Buddh Nagar police, officials said on Wednesday.

The children, including six girls and three boys, hail from different parts of Uttar Pradesh and Bihar and were rescued on Tuesday following a tip-off received by the police.

Section 111 of the Bharatiya Nyaya Sanhita (BNS), 2023, defines and penalizes **organized crime** committed by **syndicates** or individuals for material/financial gain. It covers activities like kidnapping, extortion, cyber-crimes, and trafficking,

END TO END TRAFFICKING CYCLE	Threats	Force/Coercion	Abduction	Fraud/Deception	Abuse of Power	Inducement, including the giving or receiving of payments or benefits, in order to achieve the consent
Recruitment	?	?	?	?	?	?
Transportation	?	?	?	?	?	?
Transfer	?	?	?	?	?	?
Harbouring	?	?	?	?	?	?
Receiving person(s)	?	?	?	?	?	?

Tribal kids trafficked to pollinate Tamil Nadu cotton farms

Saranya Chakrapani / TNN / Updated: Nov 2, 2021, 06:39 IST

SHARE PRINT AA FOLLOW US

Chasing birds in the Jawadhu hills forests on an August afternoon, 13-year-old Sakthi and his friends Tirumurthy and Prabhu were approached by a middle-aged man offering them clothes, money and mobile phones. The man loaded them all on his motorbike and rode



Malayali tribal boys and girls from Kalvarayan, Jawadhu and Vellimalai hills are made to work in...

CHENNAI: Chasing birds in the Jawadhu hills forests on an August afternoon, 13-year-old Sakthi and his friends Tirumurthy and Prabhu were approached by a middle-aged man offering them clothes, money and mobile phones. The man loaded them all on his motorbike and rode four-and-a-half-hours away to the cotton fields of Siruvachur in Perambalur district.

Tamil Nadu: Four girls rescued from Siruvachur cotton fields

Saranya Chakrapani / TNN / Updated: Nov 29, 2021, 08:55 IST

SHARE PRINT AA FOLLOW US

In a raid conducted by the department of labour welfare and skill department, four tribal girls who were illegally employed in cotton fields in Siruvachur, were rescued by a team of officials on Saturday.



Picture used for representational purpose

In a raid conducted by the department of labour welfare and skill department, four tribal girls who were illegally employed in cotton fields in Siruvachur, were rescued by a team of officials on Saturday.

The operation follows a TOI report dated November 2, ('Young [Tamil Nadu](#) tribals plucked away to grow cotton') that [exposed the trafficking of hundreds](#)

of tribal children from Jawadhu, Vellimalai and Kalvarayan hills to manually pollinate cotton in farms located between Kallakuruchi and Salem.

40 people freed from bonded labour in Andhra Pradesh

They were forced to work under inhumane conditions at two shrimp farms in Prakasam district



ONGOLE: In a significant rescue operation, Prakasam district authorities, alongside police and NGO representatives, freed 40 individuals from bonded labour at two shrimp farms near Ananthavaram village of Tanguturu mandal.

The labourers, trafficked from vulnerable tribal and rural communities in Koraput and Malkangiri in Odisha, and Bastar, Dantewada, and Kanker in Chhattisgarh, were subjected to inhumane conditions. They were lured with a Rs 15,000 advance via UPI and promises of decent jobs, and faced exploitation upon arrival.

Home > Odisha > Gajapati

17 Odisha Labourers Toiling In AP Prawn Farms Seek Govt Intervention

by **OB Buresu** — September 22, 2021

in Gajapati, Koraput, Labour Exodus, Rayagada

Reading Time: 1 min read



Bonded labour: Jalgaon police book 2 contractors

TNN | Jan 13, 2022, 11:01 AM IST

SUGAR FACTORY

Aurangabad: The Jalgaon police have finally registered a case against two labour contractors following directives from the Bombay high court bench at Aurangabad.

The division bench of HC comprising Justices V K Jadhav and Sandipkumar More heard the habeas corpus petitions on January 5. Assistant public prosecutor S J Salgare submitted that upon filing of the complaint about wrongful detention and bonded labour, the criminal proceeding would be initiated.

The division bench of HC granted liberty to file the complaint in the case, which was done on Monday.

Bodvad police inspector Rahul Gaikwad said that they have booked the two suspects, one hailing from Sangli district of Maharashtra and second from Belagavi of Karnataka on the charges of outraging modesty of woman, sexual harassment, wrongful restraint, voluntarily causing hurt and criminal intimidation. In addition to this, suspects have also been slapped with the sections of The Bonded Labour System (Abolition) Act 1976.

The complaint alleges that the male members were brutally beaten up and women were allegedly sexually harassed by the labour contractors.

In the month of December, two tribals hailing from rural areas of Jalgaon district through advocate Jitendra Patil had moved the high court stating that their repeated pleas to the Jalgaon police to trace their 'missing' relatives had failed to evoke any response.

Adv Patil had submitted before the court that in October a labour contractor had allegedly taken the family of four on the pretext of engaging them in sugar cane cutting jobs and later sold them off to a brick kiln owner in Daund. In a similar incident, the other family was allegedly forced into bonded labour at a sugar factory in Karnataka since October.

Construction	Incense/Agarbathi	Paper-plate making unit
Beedi	Rice Mills	Goat herding
Brick Kilns	Sugarcane farms	Utensil Polish
Cotton Farms	Stone Quarries	Cattle Grazing
Garments	Footwear	Shrimp Farming
Apparels	Glass Bangles	Polybag Manufacturing
Spinning Mills	Shrimp processing	Papermill
Fireworks	Poultry	Rubber
Silk	Cooler pump-making factory	Printing press
Toy Manufacturing	Agriculture fields	Carpet
Locks	Livestock grazing	Sugar Mill
Coffee Estate	Meat Factory	Distillery (Liquor factory)

(These are incidents and do not indicate extent of prevalence)

Indian textile sector (70% Migrant Workforce)

9 Trade Bodies sign Code of conduct that prohibits and prevents child labour and forced labour

GUIDELINES FOR PREVENTION OF FORCED LABOUR

Factories are required to establish and enforce the following guidelines for implementation:

- ➔ A factory should have a written policy and procedures on prohibition of bonded labour and forced labour.
- ➔ To designate an individual who would be responsible and authorised to implement systems and procedures relating to prohibition of bonded labour and forced labour.
- ➔ To have a procedure for training and creating awareness among all persons employed (especially those employed on selection procedure), on bonded and forced labour conditions.
- ➔ The company will adhere to all national laws, regulations, and procedures related to the prohibition of forced labour, human trafficking, and the employment of migrant workers.
- ➔ Workers will be informed of their rights in a proactive manner at the beginning of their employment, in a language they understand.
- ➔ A written employment contract will be provided to employees in a language they understand, signed by both parties before the start of employment, with copies provided to both the employee and employer.
- ➔ Recognising the correlation between gender inequality, discrimination, and forced labour, the company will establish separate policies to address these issues alongside its forced labour policies.

SYSTEM FOR PREVENTION OF FORCED LABOUR

- ➔ Identify and maintain all applicable statutory / legal records, registers and records related to the factory, data and information collection related to bonded labour or forced labour conditions and reporting to the management.
- ➔ Periodically review issues arising out of conditions leading to instances of bonded and forced labour by the management and implement procedures for corrective and preventive action.
- ➔ Ensure that no worker is engaged in any work against his / her will or threatened with corporal punishment or coercion of any kind.
- ➔ Ensure that workers maintain possession or control of personal documents such as passports and identity papers. The company may only retain copies of original documents for record-keeping purposes.
- ➔ Prohibit use of bonded or forced labour in any of the units or premises of the organization and tier 2 and tier 3 supply chain.
- ➔ Establish clear recruitment policies in alignment with local laws and ILO legislations ratified by India to prevent forced labour or human trafficking during the recruitment process.
- ➔ Regulate wage distribution and manage and monitor advances and loans to prohibit conditions of bonded labour and forced labour.
- ➔ Regulate contract labour employment to comply with legal requirements.
- ➔ Identify conditions/legal provisions that could be construed as bonded labour and forced labour and incorporate in relevant procedures.



ABSTRACT

High Level Monitoring Committee meeting on Bonded Labour – Government tenders to include Terms and Conditions against engaging child and bonded labour – Orders Issued.

LABOUR WELFARE AND SKILL DEVELOPMENT(U1) DEPARTMENT

G.O.(Ms.) No.73

Dated: 24.04.2023.

சேய்கிருந்து வருடம் – சித்திரை-11,

திருவாரூர் ஆண்டு 2054.

Read:

1. Minutes of High Level Monitoring Committee meeting on Bonded Labour held on 25.07.2022.
2. From the Principal Secretary / Commissioner of Labour, Letter No. T2/32322/2022, dated 16.12.2022.

ORDER:-

In the meeting of High Level Monitoring Committee on Bonded Labour, chaired by the Chief Secretary to Government, held on 25.07.2022, it was decided that Government tenders should include an appropriate condition proscribing the engagement of child labour and bonded labour.

2. In the reference 2nd read above, The Principal Secretary / Commissioner of Labour has sent the proposal in this regard as follows:-

- Tamil Nadu is one of the largest buyers of goods and services. The nature and scale of Government procurement implies that it may be exposed to a range of supply chain involving human rights risks in the form of bonded labour, forced labour, grievous forms of child labour and human trafficking etc., that undermine the integrity of Government supply chain.
- State departments that call for tenders can play a critical role in driving greater awareness on bonded labour, child labour and human trafficking and help create a responsible business ecosystem. In order to combat the bonded labour and child labour system, a policy of self declaration needs to be put in place. Thus, the vendors bidding for Government

Centre asks states to form policies to end forced labour

The Union labour ministry has asked states to frame individual policies to utilise a federal scheme to rehabilitate forced workers and prevent human trafficking

Published on: Oct 19, 2025 5:14 AM IST

By Zia Haq X , New Delhi



M-1341
03/10/2025 Secy (Labour)

U.S. MO. (1)
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1341/25
श्रम और रोजगार मंत्रालय
श्रम शक्ति भवन
नई दिल्ली-110001
Tele : 91-11-23710265
E-mail : secy-labour@nic.in

सत्यमेव जयते
MINISTRY OF LABOUR AND EMPLOYMENT
SHRAM SHAKTI BHAVAN
NEW DELHI - 110001

वंदना गुरनानी
भारत सरकार के सचिव
VANDANA GURNANI
Secretary to Govt. of India

MINISTRY OF LABOUR AND EMPLOYMENT
SHRAM SHAKTI BHAVAN
NEW DELHI - 110001

Secy (Labour) D.O. No. S-16014/02/2022-BL (e- 137543)

September 25, 2025

3-21
6/09
9/10

As you are aware that as per the Bonded Labour System (Abolition) Act, 1976, the identification, release and rehabilitation of Bonded Labourers are the direct responsibility of the respective State/UT Governments. Moreover, Section 13 of the Act mandates that every State/UT Government is required to constitute a Vigilance Committee in each District and each Sub-Division to advise for the proper implementation of the Act.

2. In order to assist the State/UT Governments in the task of rehabilitation, this Ministry is implementing a Central Sector Scheme for Rehabilitation of Bonded Labourers-2021. The scheme is demand driven, where amount spent for rescue and rehabilitation of bonded labourers is reimbursed to the concerned State/UT Governments on the receipt of the proposal within the framework of the scheme guidelines. A copy of the scheme guidelines is enclosed for ready reference. However most of the times the proposals are received after a delay of many years thereby causing administrative difficulties in sanctioning the proposal and timely release of funds.

3. Further, to complement the above said activities, financial assistance is also provided to States/UTs to conduct **Survey in sensitive districts, Evaluatory studies, and Awareness generation programmes.** However, very few States have submitted proposals seeking financial assistance to conduct these activities.

4. The Bonded Labour Act necessitates creation of a Bonded Labour Rehabilitation Fund at the District level by each State with a permanent corpus of at least Rs. Ten lakhs at the disposal of the District Magistrate to be utilised for extending immediate financial assistance to the released bonded labourers. The entire penalties recovered from the perpetrators of the bonded labour upon conviction, are to be deposited in the corpus. However, it has been observed that some states have not created/apprised the Ministry about such funds created by them.

5. The issue regarding inter-state trafficking of bonded labourers and non-payment of immediate financial assistance was challenged before the Hon'ble Supreme Court of India in WP(C) No. 511/2022 titled "Surendra Manjhi & Anr. vs Union of India & Ors.", where the Hon'ble Court, vide its order dated 22.11.2024, directed this Ministry, to convene a meeting with State governments and come out with a proposal which addresses the issue of inter-state trafficking, grant of release certificate and a simplified procedure to implement provisions of the scheme for providing financial assistance to rescued bonded labourers including children.

6. Accordingly, this Ministry held consultations with the States/UTs on 16.12.2024 wherein Hon'ble SC's directions were conveyed to the States with a request to take necessary actions. This was followed by a DO letter to Chief Secretaries on 19.12.2024. However, not much progress seems to have been made in this regard.

CIRCULAR MEMORANDUM

Sub: Police – Advisory on the crimes of Human Trafficking – Instructions issued – Regarding.

Kind attention of the unit officers is drawn, Human Trafficking offences are heinous crime which jeopardizes the future of the victims and social fabric of society. The investigation of cases relating to trafficking offences should be given priority and all out efforts should be taken for successful prosecution of these cases.

2. Kindly refer to Criminal Law Amendment Act, 2013 which has incorporated the provisions against human trafficking in section 370 IPC and 370 A IPC.

3. All Commissioners of Police in cities and Superintendents of Police in Districts are requested to instruct all sub ordinate officers under your jurisdiction to take following action in case of Human trafficking:-

- a. The cases registered in connection with human trafficking for commercial sex exploitation and labour section 370 IPC (and if relevant section 370 A IPC too) shall also be added, besides all the relevant sections of Immoral Traffic Prevention Act and POCSO Act. Sections 362 to 374 IPC should also be included.
- b. In every FIR on the crime of trafficking for labour, in addition to the relevant sections of Child Labour Act and Bonded Labour Abolition Act, section 370 IPC (and if relevant, section 370 A IPC too) shall also be added. If any assault, sexual abuse or rape was unleashed then appropriate section of law shall also be added. Similarly, the Charge sheet also be filed under labour laws as well as section 370 IPC.
- c. All crimes of human trafficking be investigated from the organized crime perspective. The source, transit and destination should be linked cogently. Investigation should be carried out at all these places and all offenders including facilitators should be arrested.
- d. Deserving and Habitual offenders of trafficking offences should be detained under Preventive Detention Act.
- e. An interrogation report of accused and interviewing report of the victim to be prepared. Copy of these reports should be maintained in Anti Human Trafficking Unit.

RISKS FROM A LEGISLATIVE LENS

OVERALL RISKS

- Legal
- Financial
- Disruption
- Reputation
- Market Access Restriction

BEST PRACTICES

ILO OPERATIONAL INDICATORS OF HUMAN TRAFFICKING

INDICATORS OF DECEPTIVE RECRUITMENT

Strong Indicator

Deceived about the nature of the job, location or employer

Medium Indicators

Deceived about conditions of work

Deceived about content or legality of work contract

Deceived about family reunification

Deceived about housing and living conditions

Deceived about legal documentation or obtaining legal migration status

Deceived about travel and recruitment conditions

Deceived about wages/earnings

Deceived through promises of marriage or adoption

Weak Indicator

Deceived about access to education opportunities

INDICATORS OF COERCIVE RECRUITMENT

Strong Indicator

Violence on victims

Medium Indicators

Abduction, forced marriage, forced adoption or selling of victim

Confiscation of documents

Debt bondage

Isolation, confinement or surveillance

Threat of denunciation to authorities

Threats of violence against victim

Threats to inform family, community or public

Violence on family (threats or effective)

Withholding of money

INDICATORS OF RECRUITMENT BY ABUSE OF VULNERABILITY

Medium Indicators

Abuse of difficult family situation

Abuse of illegal status

Abuse of lack of education (language)

Abuse of lack of information

Control of exploiters

Economic reasons

False information about law, attitude of authorities

False information about successful migration

Family situation

Personal situation

Psychological and emotional dependency

Relationship with authorities/legal status

Weak Indicators

Abuse of cultural/religious beliefs

General context

Difficulties in the past

Difficulty to organise the travel

INDICATORS OF EXPLOITATION

Strong Indicator

Excessive working days or hours

Medium Indicators

Bad living conditions

Hazardous work

Low or no salary

No respect of labour laws or contract signed

No social protection (contract, social insurance, etc.)

Very bad working conditions

Wage manipulation

Weak Indicators

No access to education

INDICATORS OF COERCION AT DESTINATION

Strong Indicators

Confiscation of documents

Debt bondage

Isolation, confinement or surveillance

Violence on victims

Medium Indicators

Forced into illicit/criminal activities

Forced tasks or clients

Forced to act against peers

Forced to lie to authorities, family, etc.

Threat of denunciation to authorities

Threat to impose even worse working conditions

Threats of violence against victim

Under strong influence

Violence on family (threats or effective)

Withholding of wages

Weak Indicator

Threats to inform family, community or public

INDICATORS OF ABUSE OF VULNERABILITY AT DESTINATION

Medium Indicators

Dependency on exploiters

Difficulty to live in an unknown area

Economic reasons

Family situation

Relationship with authorities/legal status

Weak Indicators

Difficulties in the past

Personal characteristics

**ENHANCING FORCED LABOUR
AUDITS/MATERIALITY ASSESSMENTS IN
SUPPLY CHAINS.**

**20 COMBINATIONS/MANIFESTATIONS OF
FORCED LABOUR UNDER INDIA'S BONDED
LABOUR SYSTEM (ABOLITION) ACT, 1976**

B+HR
Business & Human Rights

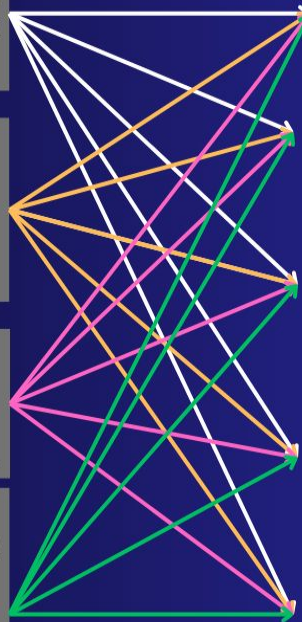
**LOSS OF
RIGHTS/FREEDOMS**

RENDER LABOUR
WITHOUT WAGES OR
LESS THAN MINIMUM
WAGE.

FORFEIT THE
FREEDOM OF
EMPLOYMENT OR
OTHER MEANS OF
LIVELIHOOD.

FORFEIT THE RIGHT
TO MOVE FREELY
THROUGHOUT THE
TERRITORY OF INDIA.

FORFEIT THE RIGHT
TO APPROPRIATE OR
SELL AT MARKET
VALUE ANY OF HIS
PROPERTY OR
PRODUCT OF HIS
LABOUR.



DUE TO OBLIGATIONS/CONSIDERATIONS

IN CONSIDERATION OF AN ADVANCE OBTAINED
BY HIM OR BY ANY OF HIS LINEAL ASCENDANTS.

IN PURSUANCE OF ANY CUSTOMARY OR SOCIAL OBLIGATION.

IN PURSUANCE OF AN OBLIGATION DEVOLVING ON HIM
BY SUCCESSION.

FOR ANY ECONOMIC CONSIDERATION RECEIVED BY HIM
OR BY ANY OF HIS LINEAL ASCENDANTS OR DESCENDANTS.

BY REASON OF HIS BIRTH IN ANY PARTICULAR CASTE OR
COMMUNITY.

BEST PRACTICES

#1.

Recognize materiality of human trafficking and bonded labour through recruitment supply chains.

OSH CODE

1. Section 49 (No fees or Commission or any cost to workers). The section explicitly states that the contractor cannot charge any fee or commission, directly or indirectly, from contract labour. (Avoidance of Recruitment Debt Trap and potential for bondage.)
2. Registration of Migrant Workers - to render them 'visible' and prevent smuggling or trafficking.

**RESPONSIBLE
RECRUITMENT**

BEST PRACTICES

#2.

Develop robust
'Responsible
Recruitment' and
'Migrant
Protection'
standards and
operational
systems

**Policy and
Governance
Structures**



**Accountability
&
Transparency**

HRDD



**Grievance
Mechanisms**

**Worker Rights
Awareness**



**Recruitment
Practices**

**Remedy
Framework**



**Outcome
Measurement**



**RESPONSIBLE
RECRUITMENT**

Governance Structures from RISK LENS?

23. Offences by companies.—(1) Where an offence under this Act has been committed by a company, every person who, at the time the offence was committed, was in charge of, and was responsible to, the company for the conduct of the business of the company, as well as the company, shall be deemed to be guilty of the offence and shall be liable to be proceeded against and punished accordingly.

(2) Notwithstanding anything contained in sub-section (1), where any offence under this Act has been committed by a company and it is proved that the offence has been committed with the consent or connivance of, or is attributable to, any neglect on the part of, any director, manager, secretary or other officer of the company, such director, manager, secretary or other officer shall be deemed to be guilty of that offence and shall be liable to be proceeded against and punished accordingly.

Explanation.—For the purposes of this section,—

(a) “company” means any body corporate and includes a firm or other association of individuals; and

(b) “director” , in relation to a firm, means a partner in the firm.

**RESPONSIBLE
RECRUITMENT**

BEST PRACTICES

#2.

Develop robust
'Responsible
Recruitment' and
'Migrant
Protection'
standards and
operational
systems

**Policy and
Governance
Structures**



HRDD



**Worker Rights
Awareness**



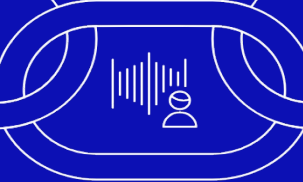
**Remedy
Framework**



**Accountability
&
Transparency**



**Grievance
Mechanisms**



**Recruitment
Practices**



**Outcome
Measurement**



**RESPONSIBLE
RECRUITMENT**

BEST PRACTICES

- NALSA (Victims of Trafficking and Commercial Exploitation Scheme), 2013
- State Level OSCTs and Guidelines (Employers and Employee Awareness)

#3.

Build capacities of your internal staff, suppliers and recruitment agents / labour providers on Indian legal frameworks, risks and compliances against bonded labour and human Trafficking.

OPERATING PROCEDURES OF ONE STOP CRISIS TEAM

1 Preventive measures

The OSCT to generate widespread awareness regarding Labour Law violations, trafficking for labour exploitation, trafficking for sexual exploitations, payment of minimum wages and legal rights of an individual. There is a lack of general awareness among the public, especially the vulnerable community in their respective districts. This team will also sensitize the employers for them to understand the necessity of compliance of all the legal requirements.

- a) The OSCT shall list all the factories, Employment units within their jurisdiction and conduct a massive awareness programmes once every 6 months for the employers regarding Labour Law violations, exploitations including sex and labour and legal rights of an individual.
- b) The OSCT shall list all the factories, Employment units within their jurisdiction and conduct a massive awareness programmes once every 6 months for the employees regarding Labour Law violations, exploitations including sex and labour and legal rights of an individual.

**RESPONSIBLE
RECRUITMENT**

#4. Promote change in broad industry/Sector

Strengthening Sectoral Capabilities



BEST PRACTICES

#5.

Partnerships and investment in State/District Protection Infrastructure and mechanisms to address Bonded labour and trafficking.

ADOPTING A CSR STRATEGY FOR ECOSYSTEM STRENGTHENING

- CSR Partnerships with State Governments
- Strengthening Women and Child Protection Systems in rural communities.
- Migration Support Desk
- Plugging Migrant workers to state welfare schemes.
- Design of State Worker App for Migrant Worker Protection.
- Design of State-Driven Learning Management System for private sector to drive scale in capacity building.
- Create a Database of Certified Ethical Labour Contractors
- Exploring 'State Duty to Protect' Projects.

**RESPONSIBLE
RECRUITMENT**

Discussions

Forced-Bonded-Trafficked Labour ESG KPI Maturity Matrix

3-TIER ESG FRAMEWORK COVERING 8 CAPABILITY PILLARS

3-Tier Maturity Model

Level 1 – Foundation (0–12 months): Policies and basic systems in place

Level 2 – Embedded (12–24 months): Practices integrated and tracked

Level 3 – Leadership (24–36+ months): Shows outcomes & impact, and system-level influence

Using This Framework

- Conduct a baseline maturity assessment
- Set target tiers by pillar
- Assign ownership and timelines
- Review annually and improve continuously