

# FORCED LABOUR POLICY GUIDELINES

**FIJI'S SOCIAL POLICY GUIDELINES FOR FIJI FISHING INDUSTRY ASSOCIATION  
PREPARED BY LRQA & CONSERVATION INTERNATIONAL**

A collaboration between Conservation International, LRQA and Fiji Fishing Industry Association.  
Thank you to all those who provided input and feedback



# FORCED LABOUR POLICY GUIDELINES

## How to Use this Document

These Forced Labour Policy Guidelines (Guidelines) have been co-developed by Conservation International (CI) and LRQA in consultation with local governments, fishing industry partners, local civil society organisations and worker organisations.

**These Guidelines provide a practical roadmap for all Fiji Fishing Industry Association (FFIA) to develop or strengthen policies that support compliance and advance social responsibility standards.** They are part of a series of policy guidelines that address various human and labour rights issues. Collectively, these guidelines form a policy guidance that aims to:

- Support FFIA members to understand what human and labour rights are and why companies should safeguard human rights and implement remediation.
- Provide step-by-step guidance on how companies can manage and safeguard human rights in own operations and supply chains.
- Signpost tools and resources to support human rights safeguards.

Recognising that implementation will vary across organisations, these Guidelines have aligned recommendations with Fiji's national laws, regional frameworks and international conventions. It also incorporates indicators from the [Social Responsibility Assessment Tool for the Seafood Sector](#) to help organisations build awareness of fundamental human rights obligations and implement operational safeguards.

### Scope

The policy guidance encompasses a wide range of labour practices, including recruitment, working conditions, wages, health and safety, and worker welfare. It covers every stage of the employment cycle, from hiring to repatriation, supporting FFIA members' compliance and alignment with local law and international standards.

Specifically, it covers the following Social Improvement Areas which were deduced from the implementation of the 2023 Social Responsibility Assessment (SRA) of the Fiji Fishing Industry Longline Fleet, and the subsequent ground truthing workshop with industry, government, and local civil society organisations.

- Occupational Health and Safety (OHS) at Sea;
- Forced Labour;
- Child Labour;
- Employment Contracts;
- Corporate Responsibility and Transparency; and
- Freedom of Association and Collective Bargaining.

## Applicability

These Guidelines provide a blueprint for fishing companies at all stages in developing their approach to human rights. It is framed around the **Minimum**, **Good** or **Best** practices fishing companies and vessel owners can implement. The framework below will help companies evaluate the current maturity level of your approach to human rights, and what steps you need to take to improve your management systems.

	Framework Definition	Maturity Level of Human Rights Approach
<b>Minimum</b>	If the policies and procedures in this category are implemented, this will reflect <b>minimum compliance</b> with Fiji national legislation, regional frameworks, and SRA performance indicators.	<ul style="list-style-type: none"> <li>You are in the early stages of developing your approach to human rights.</li> <li>You have made some commitments as a company and have basic policies and procedures in place, most of which are focused on your own operations.</li> <li>Policies exist but little detail is provided on operational processes, governance, worker training and communication. There is no process to monitor adherence to ensure compliance.</li> </ul>
<b>Good</b>	If the policies and procedures in this category are implemented, this will reflect compliance with Fiji national legislation, regional frameworks, and SRA performance indicators, as well as efforts to go <b>above and beyond</b> minimum compliance.	<ul style="list-style-type: none"> <li>You are committed to human rights, understand what your risks and priorities are for your own operations and your supply chains.</li> <li>You invest in resources to prevent and reduce those risks.</li> <li>Your workers have received training but there is a limited/weak process to ensure compliance.</li> </ul>
<b>Best</b>	If the policies and procedures in this category are implemented, this will reflect compliance to Fiji national legislation, regional frameworks, and SRA performance indicators, as well as reflecting a <b>best practice approach</b> to managing and addressing human rights topics.	<ul style="list-style-type: none"> <li>Your human rights approach is led by your board and/or executive management.</li> <li>You are making progress in preventing, reducing and remedying risks in your own operations and your supply chains.</li> <li>Your workers have received effective training and there is a robust process to ensure compliance.</li> </ul>

# 1. What is Forced Labour?

*Forced labour* is defined as all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.<sup>1</sup> In other words, forced labour consists of three elements:

- **Work or service** refers to all types of work occurring in any activity, industry or sector including in the informal economy.
- **Menace of any penalty** refers to a wide range of penalties used to compel someone to work.
- **Involuntariness:** The terms 'offered voluntarily' refer to the free and informed consent of a worker to take a job and his or her freedom to leave at any time. This is not the case, for example, when an employer or recruiter makes false promises so that a worker takes a job he or she would not otherwise have accepted.

Forced labour is often used interchangeably with terms such as 'human trafficking' and 'slavery'. While these concepts do have significant overlap, they are conceptually distinct and each has a clear definition in international law. See **Appendix III** for detailed definitions.

The International Labour Organisation (ILO) has established [eleven indicators](#) of forced labour, which are derived from the legal definition of forced labour under international standards. When assessing possible cases, consideration must be given to both the presence of these indicators and the specific context of the fishing industry, along with Fiji's national legal framework. However, waiting for all indicators to manifest before taking action risks allowing situations to deteriorate. Therefore, early intervention and follow-up measures are strongly recommended when potential forced labour risks are identified. This proactive approach helps prevent work conditions from escalating into forced labour situations while aligning with international labour standards and Fiji's national regulations. The fishing industry's unique characteristics, including remote worksites and complex labour supply chains, make this preventive approach particularly important. By addressing risks at the earliest signs, employers and authorities can protect workers' rights while maintaining compliance with both ILO conventions and national legislation.

## 2. Why is it important to address Forced Labour?

Forced labour and trafficking in persons persist in the fishing industry globally. The latest global estimates of 2021 identified at least 128,000 victims of forced labour in the fishing industry.<sup>2</sup> The diversity of actors and countries involved in fishing presents significant challenges of identifying and reporting labour exploitation. The increasing number of transnational fishing operations makes law enforcement more difficult.

*Fishers*, particularly migrant workers, face heightened risks of forced labour and human trafficking due to the isolated nature of their work. In long-distance fishing, workers often experience extreme isolation, movement restrictions, and limited opportunities to disembark vessels at sea – conditions that can facilitate exploitation. Compounding these risks, many migrant workers lack access to their identity documents, effectively trapping them in their workplace. This practice is especially prevalent among workers burdened by recruitment debt owed to employers. Research has further documented systemic abuses,

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<sup>1</sup> This is as described as the International Labour Organisation. See [What is forced labour? | International Labour Organisation](#).

<sup>2</sup> See [Forced labour in commercial fishing](#), International Labour Organisation.

including wage withholding (often justified as covering onboard food or travel expenses) and substandard living and working conditions. These factors collectively create an environment where forced labour can thrive unchecked.

### 3. What are the compliance requirements?

Fiji has [ratified](#) the international legal framework to combat forced labour, including the Forced Labour Convention 1930 (No. 29) and the Abolition of Forced Labour Convention 1957 (No. 105). The [Fijian Constitution](#) explicitly prohibits slavery, servitude, forced labour, and human trafficking.<sup>3</sup> The [Employment Relations Act 2007](#) reinforced this prohibition, stating that no person shall be required to perform forced labour.

Regional frameworks for the fishing industry also mandate that vessel operators ensure there is no forced or compulsory labour. The [Harmonised Minimum Terms and Conditions](#) (HMTCs) require that vessel operators should observe and respect any form of basic human rights of the crew in accordance with accepted international human rights standards. The [Conservation and Management Measures](#) (CMMs) of the Western and Central Pacific Fisheries Commission explicitly states that vessel owners and operators should ensure that there is no forced or compulsory labour present on fishing vessels, requiring provision of unfettered access to identity documents and unmonitored access to communication facilities to the crew.

### 4. Practical Steps: What do you need to do?

This section outlines the **Minimum**, **Good** and **Best** practices for addressing forced labour. See **Appendix I** for the international conventions and guidelines, regional and local national frameworks regulations relating to the Minimum practices, and **Appendix II** for additional tools and resources to adopt these practices in your policies and procedures.

#### 4.1 Responsible recruitment guidelines

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
<b>Policies &amp; Management Systems</b>	<p><b>M1</b> Establish written policies to demonstrate respect for human and labour rights for workers. Your Human Rights Policy should at a minimum:</p> <ul style="list-style-type: none"> <li>Respect Fiji national laws and regulations, and all applicable laws</li> </ul>	<p>Embed your Human Rights Policy in written operational procedures and processes.</p> <ul style="list-style-type: none"> <li>Assign oversight and responsibility to relevant senior management and across appropriate departments for implementing the policies. See <b>Appendix IV</b> for</li> </ul>	<p>Integrate your Human Rights Policy into internal management systems to ensure consistent implementation.</p> <ul style="list-style-type: none"> <li>Reflect your Human Rights Policy requirements in existing and new business contracts with labour agencies involved in hiring workers. These should at a</li> </ul>

<sup>3</sup> Section 10 of the Fijian Constitution states that 'A person must not be held in slavery or servitude, or subjected to forced labour or human trafficking.'

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p>of the workers' countries of origin and transit when applicable.</p> <ul style="list-style-type: none"> <li>• Respect equal treatment of Fijian nationals and migrant workers in employment and working conditions. Prohibit the use of migrant status as a threat or tool of coercion.</li> <li>• Prohibit child labour, forced labour and human trafficking.</li> <li>• Respecting freedom of association and the right to collective bargaining.</li> <li>• Prohibit discrimination, sexual and other forms of harassment and violence.</li> <li>• Prohibit the charging of recruitment fees and related costs to workers and promote the Employer Pays Principle.</li> <li>• Respect freedom of movement for workers, including prohibiting the withholding of personal identity documents and other property and right for termination of the employment contract.</li> <li>• Respect transparency in employment terms and conditions, including prohibiting contract substitution. See the <b>Employment Contracts Policy Guideline</b> for additional information.</li> <li>• Respect access to remedy and protection for whistleblowers.</li> </ul>	<p>more information of roles and responsibilities.</p>	<p>minimum explicitly include all the <b>M1</b> requirements. See <b>Appendix II</b> for relevant tools and templates.</p> <ul style="list-style-type: none"> <li>• Regularly review and update your Human Rights Policy at least annually or as risks emerge and evolve in your operations, supply chain and other business relationships.</li> <li>• Prioritise direct employment over the use of third-party labour agencies to maintain closer oversight.</li> <li>• Conduct unannounced vessel inspections or monitoring programs with worker interviews.</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<ul style="list-style-type: none"> <li>Respect duty of care to safeguard rights of workers in the case of crisis and emergency.</li> <li>Communicate and reflect the requirements of the law and your Human Rights Policy in contractual agreement with suppliers, including labour agencies.</li> </ul>		
<b>Training &amp; Internal Alignment</b>	<p><b>M2</b> Communicate your Human Rights Policy to all workers and relevant staff.</p> <ul style="list-style-type: none"> <li>Ensure that relevant staff responsible for hiring and human resources are aware of your Human Rights Policy.</li> <li>Communicate your policies to all workers in languages they understand.</li> <li>Display the policies on your website and at the workplace.</li> </ul>	<p>Ensure that all staff are aware of your Human Rights Policy and related policies and procedures.</p> <ul style="list-style-type: none"> <li>Provide regular training to all workers on your Human Rights Policy.</li> </ul>	<p>Ensure that all staff are required to take regular forced labour prevention training, at least annually.</p> <ul style="list-style-type: none"> <li>Partner with NGOs, worker representation, civil society, or government agencies to support communication and engagement with workers.</li> </ul>
<b>Recruitment guidelines</b>	<p><b>M3 Prevent abuse caused by vulnerability</b> Ensure regular employment is provided to all workers, including Fijian nationals and migrant workers.</p> <ul style="list-style-type: none"> <li>Provide all crew members a written employment contract or agreement that includes all minimum particulars as listed in Annex 6 of the Harmonised Minimum Terms and Conditions, and Annex II of the ILO C188. See the <b>Employment Contracts Policy Guidelines</b> for additional information.</li> </ul>	<p>Foster a safe working environment for all workers.</p> <ul style="list-style-type: none"> <li>Include gender-diverse perspectives in training for all workers, including the prevention and report channels for gender-based violence.</li> </ul>	<p>Pay special attention when employing vulnerable workers such as migrant workers, refugees, ethnic minority groups, women, unskilled and illiterate young workers.</p> <ul style="list-style-type: none"> <li>Consider conducting “vulnerability assessments” to help screen for high-risk factors (e.g., debt levels, language barriers, gender-based violence indicators, etc.) during recruitment.</li> <li>Conduct regular gender and context-sensitive risk assessments on board vessels and onshore</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<ul style="list-style-type: none"> <li>Do not use workers' vulnerability (e.g., migration status, illiteracy, age, gender) to offer employment conditions below the local legal minimum.</li> <li>Provide workers with access to anonymous and confidential channels to report violence and harassment. See <b>Section 4.3</b> for more information.</li> <li>Ensure a zero-tolerance non-retaliation policy for anyone who reports abuse, including <a href="#">gender-based violence</a>.</li> </ul>		<p>workplaces based on vulnerability profiles.</p> <ul style="list-style-type: none"> <li>Ensure representation of women and gender-diverse fishers in worker committees or organisations.</li> <li>Involve women, gender-diverse fishers and their representatives in policy design and decision-making, including identifying risks in the workplace.</li> <li>Leverage peer monitoring to identify early warning signs. Consider training a select group of crew members (e.g., senior fishers or union representatives) ensuring they represent diverse roles (e.g., deckhands, engineers, etc.) and nationalities for inclusivity. This group of designated worker fisher advocates can support to communicate and engage with more vulnerable members.</li> </ul>
	<p><b>M4 Stop deception</b> Provide workers with clear employment terms and contracts in advance of the recruitment process and in a language that they understand.</p>	Provide verbal explanation of the employment contracts in a language workers understand prior to their signature.	<p>Use a professional translation service provider to address any language barriers.</p> <ul style="list-style-type: none"> <li>Partner with NGOs or worker representatives to support worker briefings and communication in source countries to ensure they understand the terms and conditions of their employment.</li> </ul>
	<p><b>M5 Address restriction of movement</b> Allow workers to freely leave the workplace and terminate their employment given a reasonable period of notice in</p>	-	Install Electronic Monitoring Systems (EMS) incorporating closed-circuit television (CCTV) systems, sensors and software to

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p>accordance with the Fiji national legislation and workers employment agreement</p> <ul style="list-style-type: none"> <li>• Ensure that there is no policy preventing or restraining workers from leaving the vessels or onshore facilities, except for legitimate restrictions, such as protection of health and safety.</li> <li>• Respect workers' right to terminate their employment freely without being penalised financially, physically threatened or mentally coerced, or facing unlawful notice period.</li> </ul>		<p>prevent, detect and verify coercion or restriction of movement.</p>
	<p><b>M6 Address isolation</b> Provide workers with reasonable, unmonitored access to communication facilities and devices, at a reasonable cost and not exceeding the full cost to the fishing vessel owner.</p>	-	<ul style="list-style-type: none"> <li>• While in waters within range of a local network, ensure all fishers have reliable access to satellite communication tools.</li> <li>• While in Exclusive Economic Zone (EEZ) waters and beyond, ensure that all fishers (a) have reasonable access to Wi-Fi on a daily basis, with critical protections in place to prevent the obstruction of access to Wi-Fi, invasion of privacy, or retaliation for Wi-Fi use, and (b) are provided Wi-Fi at a reasonable cost, with the first 3GB of data per month provided to fishers for free.</li> <li>• Schedule mandatory, confidential sessions with mental health professionals during shore leave or remotely via telehealth.</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p><b>M7 Stop physical and sexual harassment, intimidation and threats</b> Establish a zero-tolerance policy on violence, harassment and intimidation in the workplace. The policy should define <i>violence and harassment</i> (including <i>gender-based violence</i>), as set out in ILO's C190 Violence and Harassment Convention (2019).</p>	<p>Ensure that all staff are aware of your zero-tolerance policy on violence, harassment and intimidation.</p>	<p>Ensure that all staff are required to take regular training regarding violence, harassment and intimidation, at least annually.</p>
	<p><b>M8 Prohibit retention of identity documents</b> Prohibit the withholding of personal identity documents and other property.</p> <ul style="list-style-type: none"> <li>• Provide workers with unfettered access to personal documents and records.</li> <li>• Provide lockable storage space (e.g., a locker, a personal safe, etc.) on board vessels to keep their documents and valuable items.</li> </ul> <p>Noting port state control and immigration compliance requirements due to the nature of fishing operations, vessel owners and/or operators may adopt the following practices to support implementation.</p> <ul style="list-style-type: none"> <li>• Instruct crew to carry necessary identity documents during voyage.</li> <li>• Obtain digital scans of the crew's identify documents with written, informed consent in a language they understand.</li> <li>• Allow crew to voluntarily deposit personal identity documents for</li> </ul>		<p>Distribute multilingual materials informing workers of their right to retain identity documents.</p>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p>safekeeping with written, informed consent in a language they understand.</p> <ul style="list-style-type: none"> <li>Maintain a log when fishers' documents are stored and returned.</li> </ul>		
	<p><b>M9 Prevent the withholding of wages</b> Prohibit wage deductions for any expenses related to work.</p> <ul style="list-style-type: none"> <li>Pay workers at least the legal minimum wage, as per the national law.</li> <li>Ensure that the remuneration systems do not require the withholding of payment to workers as a means of forced collateral.</li> <li>Pay wages to workers monthly or at other regular intervals as set out in their employment contracts.</li> </ul>	-	Educate workers about their legal minimum wage and statutory benefits.
	<p><b>M10 Prevent debt bondage</b> Prohibit the charging of recruitment fees and related costs to workers and promote the Employer Pays Principle.</p> <ul style="list-style-type: none"> <li>Communicate your policies to suppliers and labour agencies, that the recruitment fees and related costs will be covered in full by the employer and that no worker should pay for a job.</li> <li>Reflect the requirements in the contractual agreements.</li> </ul>	<p>Ensure that no recruitment fees or related costs are borne directly or indirectly by the workers.</p> <ul style="list-style-type: none"> <li>Map the recruitment steps, the parties and intermediaries involved and explicitly state that all recruitment-related fees and costs must be paid by the employer.</li> <li>Oversee the recruitment steps (especially for migrant workers, from the countries of origin to countries of destination).</li> <li>Conduct checks on the labour agencies you work with to identify any recruitment fees paid by workers.</li> </ul>	<p>Establish systems and conduct checks to identify, understand and eliminate illegal third-party recruitment fees paid by workers to third-party agencies.</p> <ul style="list-style-type: none"> <li>Require agencies to disclose costs associated with recruitment and employment to inform you of the 'true cost' of recruitment, including agency fees, visas, medical exams, travel, etc.</li> <li>Where possible, establish direct hiring channels to reduce reliance on third-party labour agencies, particularly avoiding 'intermediary' labour agencies in the destination country.</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
			<ul style="list-style-type: none"> <li>Provide advance payments to agencies to support cash flow and help prevent hidden fees passed to workers or “debt traps”, where workers must repay through wage deductions.</li> </ul>
	<p><b>M11 Remove abusive working and living conditions</b> Provide workers decent working and living conditions onshore and onboard fishing vessels.</p> <ul style="list-style-type: none"> <li>Provide workers decent and regular remuneration and full insurance coverage at no cost to them.</li> <li>Provide workers a safe working environment, including safety equipment, training and medical care. See <b>Occupational Health and Safety at Sea Guidelines</b> for additional information.</li> <li>Provide workers an appropriate and habitable accommodation at no costs to workers. See <b>Occupational Health and Safety at Sea Guidelines</b> for additional information.</li> </ul>	-	-
	<p><b>M12 Eliminate excessive overtime</b> Ensure that all overtime is voluntary.</p> <ul style="list-style-type: none"> <li>Pay all overtime hours at a premium rate as legally required or by contractual agreement, whichever is higher.</li> </ul>	Establish a mechanism to determine, monitor and control the overtime hours of workers.	Establish an independent, third-party oversight mechanism for verification of working hours.

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p>Ensure that workers have regular rest of sufficient lengths.</p> <ul style="list-style-type: none"> <li>• Implement a mechanism for workers to record hours worked.</li> <li>• Ensure that workers have at least 10 hours of rest in a 24-hour period and at least 77 hours in a 7-day period.</li> </ul>		
<b>Monitoring &amp; Evaluation Framework</b>	<p><b>M13</b> Develop a process to monitor, measure and record responsible recruitment performance. The process should at a minimum:</p> <ul style="list-style-type: none"> <li>• Monitor performance of defined targets and key performance indicators.</li> <li>• Allocate responsibility and accountability at different levels, from operational to senior management levels. See <b>Appendix IV</b> for more information on roles and responsibilities.</li> <li>• Maintain records of your performance against responsible recruitment indicators.</li> <li>• Document any improvement action plans (including preventive and corrective action plans) taken in response to the results.</li> </ul>		<p>Use implementation results to guide the continuous improvement of your responsible recruitment systems and practices.</p> <ul style="list-style-type: none"> <li>• Conduct unannounced internal or third-party audits to evaluate compliance and performance. See <b>Appendix II</b> for relevant tools for social responsibility assessments.</li> <li>• Review and update the selected targets and indicators based on the risks identified at least annually.</li> <li>• Incorporate input gathered from worker grievance mechanisms and feedback channels (e.g., hotline, survey, suggestion box, etc.) into regular evaluation.</li> <li>• Monitor the achievement of specific improvement plans, established performance criteria and objectives.</li> </ul>

#### 4.2 Minimum standards for crew recruiters

*Labour agencies* play an important role in upholding responsible recruitment, especially for migrant workers hired through these agencies. To uphold ethical recruitment practices, you are responsible for ensuring the labour agencies you work with comply with the following practices.

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
<b>Respect for human rights</b>	<p><b>M1</b> Ensure that contractual agreements require labour agencies to comply with all applicable laws and your human rights policies.</p> <ul style="list-style-type: none"> <li>• Respect the hierarchy of flag state and coastal states. This includes compliance with Fiji’s (flag state) national law, and compliance with all applicable (coastal states) laws while at sea.</li> <li>• Engage only with compliant labour agencies.</li> <li>• Communicate your Human Rights Policy with the agencies and reflect the requirements in contractual agreements.</li> <li>• Include clear protocols of penalties, indemnities and corrective actions in case of non-compliance.</li> </ul>	-	<p>Conduct checks on labour agencies you work with to evaluate their recruitment practices.</p> <ul style="list-style-type: none"> <li>• Require labour agencies to carry out their own ongoing due diligence and maintain transparency on their business partners, including subagents.</li> <li>• Regularly audit labour agencies and monitor their improvement plan.</li> <li>• Hire local staff in the country of origin, or work with trusted civil society organisations to provide oversight of the recruitment process.</li> </ul>
<b>Recruitment and employment</b>	<p><b>M2</b> Ensure that no recruitment fees or related costs are charged to, or otherwise borne by, recruited workers and jobseekers.</p>	-	<p>Include a protocol for full payment of all recruitment fees and related costs per itemised list.</p> <ul style="list-style-type: none"> <li>• Whenever possible, pay labour agencies directly to avoid unnecessary charges to workers.</li> <li>• Prohibit any illegitimate fees, costs and deposits charged to jobseekers and workers, including by subagents.</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p><b>M3</b> Ensure that workers who are recruited through labour agencies understand the terms and conditions of employment.</p> <ul style="list-style-type: none"> <li>Review and approve labour agencies' posting of job advertisements.</li> <li>Provide employment contracts in workers' own language that include clear, simple and compliant terms and conditions during selection.</li> <li>Ensure that the initial employment contract signed prior to migrant workers' departure is not substituted at a later stage for another employment contract with less favourable conditions to them.</li> </ul>	-	<p>Educate workers about their rights throughout the recruitment process.</p> <ul style="list-style-type: none"> <li>Prior to the interview and selection stage, hold an information session for jobseekers that outlines the terms of employment in a language they can understand.</li> <li>Ensure migrant workers participate in official pre-departure orientation training in the country of origin.</li> <li>Provide workers with accessible grievance channels run by you or labour agencies you work with.</li> <li>Monitor the well-being of migrant workers after their arrival at the destination country and employment.</li> </ul>
	<p><b>M4</b> Ensure that workers have free and complete access to their own passports, contracts or other identity documents throughout their labour migration process.</p>	-	-
<b>Termination and return</b>	<p><b>M5</b> Ensure the safe return and replacements of migrant workers in the event of termination, crisis and emergencies.</p> <ul style="list-style-type: none"> <li>Ensure the employment contracts and relevant orientations conducted by labour agencies include accurate information about the workers' rights to change employers in Fiji, onward migration or repatriation.</li> </ul>	-	-

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<ul style="list-style-type: none"> <li>Cover the costs of repatriation for foreign migrant workers when the contract is terminated early or expired, except when the worker has been found in breach of contract.</li> </ul>		

#### 4.3 *Worker engagement* channels & *grievance mechanisms*

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
<b>Grievance Management Systems</b>	<b>M1</b> Establish or participate in a grievance mechanism that is accessible to workers. <ul style="list-style-type: none"> <li>Ensure that the grievance mechanism is easily accessible to workers during recruitment, employment and termination.</li> <li>Establish clear policies and procedures on scope for complaints, timeline, and focal points screening and handling grievances.</li> <li>Do not engage in retaliatory practices.</li> <li>Do not prevent workers from accessing alternative grievance mechanisms, such as State-led mechanisms.</li> </ul>	Engage with workers in the design and implementation of grievance mechanisms.	Proactively consult and engage with workers of different backgrounds (e.g., gender, nationality, ethnicity, ability, etc.) in the design and implementation of grievance mechanism. <ul style="list-style-type: none"> <li>Take steps to understand the needs of groups who might be vulnerable or marginalised (e.g., migrant workers, women, ethnic minorities).</li> </ul>
	<b>M2</b> Provide information and channels for workers to submit complaints in a language they understand.	Educate workers about the remediation program. <ul style="list-style-type: none"> <li>Highlight the non-retaliation policy, confidentiality and anonymity, and non-waiver of other remedies.</li> </ul>	Educate workers about substantive rights, including their legal rights and rights under company policies.

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
		<ul style="list-style-type: none"> <li>• Advertise and publicise the existence of your remediation program.</li> <li>• Engage directly with workers in the design and implementation of the grievance mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop a worker committee or representation who are trained to conduct these awareness sessions.</li> <li>• Partner with external stakeholders to conduct training for workers on their rights.</li> <li>• Provide information and connect workers to other grievance mechanisms, including those run by labour agencies, trade unions, civil society organisations and governments.</li> </ul>
	<p><b>M3</b> Develop a predictable and transparent grievance submission and investigation process.</p> <ul style="list-style-type: none"> <li>• Establish written guidance on the grievance investigation process. There should be guidance concerning the collection and assessment of evidence, procedures for confidentiality, and engagement with relevant workers.</li> <li>• Translate your grievance process and related guidance into relevant worker languages, such as iTaukei, Bahasa Indonesia, and Tagalog.</li> <li>• Keep records of all grievances received, investigation results, and final outcomes.</li> <li>• Address the potential barriers that typically prevent use by workers, such as fear of retaliation or deportation, language barriers,</li> </ul>	<p>Ensure that workers understand the grievance submission and investigation process, including how to initiate a grievance.</p> <ul style="list-style-type: none"> <li>• Provide workers with training and guidance on how to raise a grievance.</li> <li>• Offer verbal explanations of processes to workers with low literacy levels.</li> </ul>	<p>Track the usage and evaluate the effectiveness of grievance channels.</p> <ul style="list-style-type: none"> <li>• Review records of all grievances to identify any trends in non-compliance.</li> <li>• Incorporate lessons learnt into risk management measures.</li> <li>• Update internal policies and procedures based on the feedback and remediation results.</li> <li>• Report publicly or share anonymised findings internally to monitor progress.</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	costs to workers, lack of trust, and lack of written evidence.		
	<p><b>M4</b> Provide effective and prompt remediation where harm has occurred.</p> <ul style="list-style-type: none"> <li>• Screen and verify the grievance. Document the decision and rationale of whether a grievance should be further investigated, and communicate the decision to relevant parties and workers.</li> <li>• Investigate the grievance to determine response. Consider the complexity, severity and urgency of grievance when determining the response.</li> <li>• Assign oversight to relevant senior management and responsibility to appropriate departments to screen, verify and handle the grievance.</li> <li>• Respect the confidentiality of workers who wish to remain anonymous.</li> <li>• Involve workers in investigating the grievance and determining the remedy. See <b>Appendix V</b> for common types of remedies.</li> <li>• Where verified that harm has occurred, provide workers with remediation that is commensurate to the violation.</li> </ul>	<p>Provide training for in-house or partnered focal points to screen and handle complaints.</p> <ul style="list-style-type: none"> <li>• Include cultural and gender-sensitive training for staff handling and investigating grievance.</li> </ul>	<p>Establish specialised procedures for small grievances and more complex grievances.</p> <ul style="list-style-type: none"> <li>• Provide specialised response for instances of forced labour and other serious forms of exploitation.</li> <li>• Consult affected workers and their representatives to determine the remedy and give the possibility to appeal the outcome.</li> </ul>
	<p><b>M5</b> Monitor the implementation of remediation.</p>	-	Conduct regular reviews to identify areas for improvement in the mechanism and

	<b>MINIMUM</b>	<b>GOOD</b> In addition to MINIMUM	<b>BEST</b> In addition to GOOD
	<ul style="list-style-type: none"> <li>Confirm with the workers when the remedy has been fully provided.</li> <li>Confirm with the workers if there has been any retaliatory treatment. If retaliatory treatments are confirmed, take additional actions to address the remaining issues before the incident can be closed.</li> <li>Document the implementation of a remedy. The final documentation should include the receipt of grievance, investigation and resolution, and a record of acknowledgment about the established outcome signed by the affected migrant worker.</li> </ul>		<p>overall management system to prevent future grievances and harms.</p> <ul style="list-style-type: none"> <li>Specify standards for how grievances and remedies will be assessed. This can include analysis of international and domestic guidance, the severity of the grievance, and the special needs of workers.</li> <li>Assess and evaluate the results of remediation. Determine if any broader changes in your policies, compliance and due diligence programs are needed.</li> <li>Track grievance and complaints disaggregated by worker demographics (e.g., nationality, gender, identity, etc.) to identify gaps and opportunities for improvement.</li> </ul>
<b>Worker engagement</b>	<p><b>M6</b> Communicate your Human Rights Policy and all relevant policies and processes to all workers.</p>	Include workers in the design, implementation and monitoring of your policies and management systems related to human rights.	Proactively consult and engage workers of different backgrounds (e.g., gender, nationality, ethnicity, ability, etc.) and their representatives in the design and implementation of relevant internal policies, due diligence processes and grievance mechanisms.
	<p><b>M7</b> Provide effective support services to address the needs of workers.</p> <ul style="list-style-type: none"> <li>Ensure that all internal policies, training and briefings, grievance mechanisms, employment contracts and other relevant documents can be accessed in</li> </ul>	Support workers' participation in social activities and events available in the host community.	<p>Collaborate with credible partners and organisations that can help overcome persistent challenges.</p> <ul style="list-style-type: none"> <li>Establish partnerships with credible third-party organisations, including trade unions and civil society organisations that are trusted by workers.</li> </ul>

	MINIMUM	GOOD In addition to MINIMUM	BEST In addition to GOOD
	<p>simple and clear languages that are understood by all workers.</p> <ul style="list-style-type: none"> <li>• Provide workers with reasonable access to internet and communication services, including onshore and on vessels, to enable unhindered contact with families and support networks.</li> </ul>		<ul style="list-style-type: none"> <li>• Join collaborative platforms such as sectoral and industry-level associations to benefit from access to available resources and training, to learn from best practices and to participate in policy dialogue.</li> <li>• Prioritise actions and resources for collaboration based on risk and workers' vulnerability. See <b>Appendix II</b> for relevant tools of risk prioritisation.</li> </ul>

## Appendix I: References for Minimum Requirements

4.1 Responsible recruitment	
<b>Policies &amp; Management Systems</b>	<p><b>M1</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution</a> of the Republic of Fiji</li> <li>• Fiji <a href="#">Employment Relations Act 2007</a></li> <li>• <a href="#">Declaration on Fundamental Principles and Rights at work and its Follow-up</a>, ILO (2022)</li> <li>• SRA Performance Indicator 1.1.1 Abuse and harassment S2</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S4 – S5</li> <li>• SRA Performance Indicator 1.1.3 Child Labour S6</li> <li>• SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S2 – S3</li> <li>• SRA Performance Indicator 2.1.2 Discrimination S2 – S5</li> </ul>
<b>Training &amp; Internal Alignment</b>	<p><b>M2</b></p> <ul style="list-style-type: none"> <li>• SRA Performance Indicator 1.1 Abuse and harassment S7</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S4</li> <li>• SRA Performance Indicator 2.1.2 Discrimination S7</li> </ul>
<b>Recruitment Guidelines</b>	<p><b>M3 Prevent abuse caused by vulnerability</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a></li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li>• <a href="#">The Harmonised Minimum Terms and Conditions</a> (HMTCs), Pacific Islands Forum Fisheries Agency</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S6</li> <li>• SRA Performance Indicator 1.1.5 Earnings and benefits S13</li> </ul> <p><b>M4 Stop deception</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a> Article 16 – 20</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S6</li> <li>• SRA Performance Indicator 1.1.5 Earnings and benefits S13</li> </ul> <p><b>M5 Address restriction of movement</b></p> <ul style="list-style-type: none"> <li>• Fiji <a href="#">Employment Relations Act 2007</a></li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S3</li> </ul> <p><b>M6 Address isolation</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a></li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> </ul>

	<ul style="list-style-type: none"> <li>• SRA Performance Indicator 1.1.8 Occupational Safety S3, S7</li> </ul> <p><b>M7 Stop physical and sexual harassment, intimidation and threats</b></p> <ul style="list-style-type: none"> <li>• SRA Performance Indicator 1.1 Abuse and harassment S3 – S6</li> </ul> <p><b>M8 Prohibit retention of identity documents</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul> <p><b>M9 Prevent the withholding of wages</b></p> <ul style="list-style-type: none"> <li>• Fiji <a href="#">Employment Relations (National Minimum Wage) (Amendment) Regulations 2024</a></li> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a> Article 23</li> <li>• <a href="#">The Harmonised Minimum Terms and Conditions</a> (HMTCs), Pacific Islands Forum Fisheries Agency</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S8</li> </ul> <p><b>M10 Prevent debt bondage</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a> Article 22(3)</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S7</li> </ul> <p><b>M11 Remove abusive working and living conditions</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a> Annex III: Fishing vessel accommodation; Articles 27, 29, and 32</li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li>• <a href="#">The Harmonised Minimum Terms and Conditions</a> (HMTCs), Pacific Islands Forum Fisheries Agency</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> <li>• SRA Performance Indicator SRA 1.1.7a Access to basic services for worker housing/live-aboard vessels S3 – S10</li> </ul> <p><b>M12 Eliminate excessive overtime</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a></li> <li>• SRA Performance Indicator SRA 1.1.6 Adequate rest S2 – S6</li> </ul>
<b>4.2 Minimum standard for crew recruiters</b>	
<b>Respect for human rights</b>	<p><b>M1</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Constitution</a> of the Republic of Fiji</li> <li>• Fiji <a href="#">Employment Relations Act 2007</a></li> <li>• <a href="#">Declaration on Fundamental Principles and Rights at work and its Follow-up</a>, ILO (2022)</li> <li>• ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a></li> <li>• SRA Performance Indicator 1.1.1 Abuse and harassment S2</li> </ul>

	<ul style="list-style-type: none"> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S4 – S5</li> <li>• SRA Performance Indicator 1.1.3 Child Labour S6</li> <li>• SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S2 – S3</li> <li>• SRA Performance Indicator 2.1.2 Discrimination S2 – S5</li> </ul>
<b>Recruitment and employment</b>	<p><b>M2</b></p> <ul style="list-style-type: none"> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a> Article 22(3)</li> <li>• ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a></li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S7</li> </ul> <p><b>M3</b></p> <ul style="list-style-type: none"> <li>• ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a></li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S6</li> <li>• SRA Performance Indicator 1.1.5 Earnings and benefits S13</li> </ul> <p><b>M4</b></p> <ul style="list-style-type: none"> <li>• ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a></li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul>
<b>Termination and return</b>	<p><b>M5</b></p> <ul style="list-style-type: none"> <li>• ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a></li> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li>• <a href="#">The Harmonised Minimum Terms and Conditions</a> (HMTCs), Pacific Islands Forum Fisheries Agency</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul>
<b>4.3 Worker engagement channels &amp; grievance mechanisms</b>	
<b>Grievance Management Systems</b>	<p><b>M1</b></p> <ul style="list-style-type: none"> <li>• <a href="#">ILO Declaration on Fundamental Principles and Rights at work and its Follow-up</a>, ILO (2022)</li> <li>• SRA Performance Indicator 1.1.1 Abuse and harassment S2</li> <li>• SRA Performance Indicator 1.1.2a Human trafficking and forced labour S2</li> <li>• SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S2 – S3</li> </ul> <p><b>M2</b></p> <ul style="list-style-type: none"> <li>• SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S2</li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul> <p><b>M3</b></p> <ul style="list-style-type: none"> <li>• SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S3</li> <li>• SRA Performance Indicator 1.1.1 Abuse and harassment S8</li> </ul>

	<ul style="list-style-type: none"> <li>Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul> <p><b>M4</b></p> <ul style="list-style-type: none"> <li>SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S4</li> <li>SRA Performance Indicator 2.1.2 Stakeholder participation and collaborative management S4</li> </ul> <p><b>M5</b></p> <ul style="list-style-type: none"> <li>SRA Performance Indicator 2.1.1 Grievance reporting and access to remedy S4</li> </ul>
<b>Worker engagement</b>	<p><b>M6</b></p> <ul style="list-style-type: none"> <li>SRA Performance Indicator 1.2.2 Corporate responsibility and transparency S8</li> </ul> <p><b>M7</b></p> <ul style="list-style-type: none"> <li>SRA Performance Indicator 1.2.2 Corporate responsibility and transparency S8</li> <li>SRA Performance Indicator 2.1.2 Stakeholder participation and collaborative management S2 – S4</li> </ul>

## Appendix II: Tools and Templates

### Normative sources

<b>Fiji national laws and policies</b>	<ul style="list-style-type: none"> <li>• <a href="#">Constitution</a> of the Republic of Fiji</li> <li>• Fiji <a href="#">Employment Relations Act 2007</a></li> <li>• Fiji Offshore Fishing Crew Policy (2025-2028)</li> </ul>
<b>Regional frameworks</b>	<ul style="list-style-type: none"> <li>• <a href="#">Conservation and Management Measures</a> (CMMs), Western and Central Pacific Fisheries Commission</li> <li>• <a href="#">The Harmonised Minimum Terms and Conditions</a> (HMTCs), Pacific Islands Forum Fisheries Agency</li> </ul>
<b>ILO Conventions, protocols and recommendations</b>	<ul style="list-style-type: none"> <li>• ILO C29 <a href="#">Forced Labour Convention, 1930 (No. 29)</a></li> <li>• ILO C105 <a href="#">Abolition of Forced Labour Convention, 1957 (No. 105)</a></li> <li>• ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a></li> <li>• ILO C190 <a href="#">Violence and Harassment Convention, 2019 (No. 190)</a></li> <li>• ILO <a href="#">Protocol of 2014 to the Forced Labour Convention, 1930</a></li> <li>• ILO R203 <a href="#">Forced Labour (Supplementary Measures) Recommendation, 2014 (No. 203)</a></li> </ul>
<b>Other ILO documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">ILO indicators of Forced Labour</a></li> <li>• <a href="#">Declaration on Fundamental Principles and Rights at Work and its Follow-up</a></li> <li>• ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a></li> </ul>
<b>Other international standards</b>	<ul style="list-style-type: none"> <li>• <a href="#">The Dhaka Principles for Migration with Dignity</a>, Institute for Human Rights and Business (2011)</li> <li>• <a href="#">The International Recruitment Integrity Standard (IRIS) on Ethical Recruitment</a>, International Organisation for Migration (IOM) (2019)</li> </ul>

### Responsible recruitment

	Tools	Templates
<b>Policies &amp; Management Systems</b>	<ul style="list-style-type: none"> <li>• <a href="#">Migrant Worker Guidelines for Employers</a>, International Organisation for Migration (IOM) (2022)</li> <li>• <a href="#">Towards freedom at sea: Handbook for the detection of forced labour in commercial fishing</a>, ILO (2023)</li> </ul>	<ul style="list-style-type: none"> <li>• Annex C: Sample Policy on Forced Labour and Other Forced Labour Conditions, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> <li>• <a href="#">Tool 2 - Sample Code of Conduct Provisions</a>, <a href="#">Seafood Sector Toolset</a>, the Responsible Sourcing Tool (RST)</li> <li>• <a href="#">Tool 5 - Sample Supplier Agreement for Suppliers and Subcontractors</a>, <a href="#">Seafood Sector Toolset</a>, the Responsible Sourcing Tool (RST)</li> </ul>
<b>Training &amp; Internal Alignment</b>	<ul style="list-style-type: none"> <li>• <a href="#">E-Learning Course on forced labour</a>, International Training Centre of International Labour Organization (ITCILO)</li> </ul>	-

	<ul style="list-style-type: none"> <li>• <a href="#">Deceptive recruitment and coercion</a>, ILO InfoStories (2016)</li> <li>• <a href="#">Due diligence toolkit for fair recruitment</a>, ILO GBNFL and ILO International Training Centre</li> </ul>	
<b>Recruitment Guidelines</b>	<ul style="list-style-type: none"> <li>• <a href="#">Fair and Ethical Recruitment Due Diligence Toolkit</a>, IOM</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Template Responsible Recruitment Policy</a>, FAIR Fish project, Plan International Thailand</li> <li>• <a href="#">Template No Forced Bonded Labour Policy</a>, FAIR Fish project, Plan International Thailand</li> <li>• <a href="#">Template Anti-Trafficking in Persons Policy</a>, FAIR Fish project, Plan International Thailand</li> </ul>
	<b>Stop deception</b>	
	<ul style="list-style-type: none"> <li>• Annex II: Fisher’s work agreement, <a href="#">ILO Work in Fishing Convention, 2007 (No. 188)</a></li> <li>• Annex 6: Particulars of crew agreement, the <a href="#">Harmonised Minimum Terms and Conditions for Access by Fishing Vessels</a>, Pacific Islands Forum Fisheries Agency (FFA)</li> <li>• <a href="#">Checklist - Employment Contracts</a>, IOM</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Sample Employment Contract</a>, Fiji Immigration</li> <li>• <a href="#">Sample Employment Contract</a>, FAIR Fish project, Plan International Thailand</li> </ul>
	<b>Prohibit retention of identity documents</b>	
	-	<ul style="list-style-type: none"> <li>• Annex F: Sample Policy and Procedure on Retention of Personal Documents, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> </ul>
	<b>Prevent debt bondage</b>	
	<ul style="list-style-type: none"> <li>• <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a>, ILO (2019)</li> <li>• <a href="#">Guidance Note - Recruitment Fees and Related Costs</a>, IOM (2022)</li> </ul>	<ul style="list-style-type: none"> <li>• Annex G: Sample Policy on and Procedures on Recruitment Fees, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> </ul>
<b>Remove abusive working and living conditions</b>		
<ul style="list-style-type: none"> <li>• <a href="#">Checklist - Migrant Workers' Accommodations</a>, IOM (2022)</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Template Decent Working Conditions Policy</a>, FAIR Fish project, Plan International Thailand</li> </ul>	
<b>Monitoring &amp; Evaluation Framework</b>	<ul style="list-style-type: none"> <li>• <a href="#">Social Responsibility Assessment</a> (SRA) Tool for the Seafood Sector, Consortium on Social Risks in Seafood (2017)</li> <li>• <a href="#">Social Responsibility Assessment Tool for the Seafood Sector: A Guide to Data Collection</a>, Consortium on Social Risks in Seafood (2017)</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Social Responsibility Assessment (SRA) Tool template</a>, Consortium on Social Risks in Seafood (2017)</li> <li>• <a href="#">Worker Rights to FoA and Participation Assessment Tools</a>, Verité</li> </ul>

## Minimum Standards for crew recruiters

	Tools	Templates
<b>Respect for human rights</b>	<ul style="list-style-type: none"> <li>• <a href="#">Migrant Worker Guidelines for Employers</a>, IOM (2022)</li> <li>• <a href="#">Checklist - Labour Recruiter Service Agreements</a>, IOM</li> <li>• Annex O: Working with a Recruitment Agency, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Template Service Agreement Between Labour Recruiter and Labour User Client</a>, FAIR Fish project, Plan International Thailand</li> <li>• <a href="#">Tool 7 – Criteria for Screening Recruiters</a>, <a href="#">Seafood Sector Toolset</a>, the Responsible Sourcing Tool (RST)</li> <li>• <a href="#">Tool 9 – Monitoring the Performance of Labour Agents</a>, <a href="#">Seafood Sector Toolset</a>, the Responsible Sourcing Tool (RST)</li> </ul>
<b>Recruitment and employment</b>	<ul style="list-style-type: none"> <li>• <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a>, ILO (2019)</li> <li>• <a href="#">Checklist - Employment Contracts</a>, IOM</li> </ul>	<ul style="list-style-type: none"> <li>• Pre-departure Orientation Checklist, <a href="#">Fair and Ethical Recruitment Due Diligence Toolkit</a>, IOM</li> <li>• Post-arrival Orientation Template, <a href="#">Fair and Ethical Recruitment Due Diligence Toolkit</a>, IOM</li> </ul>
<b>Termination and return</b>	<ul style="list-style-type: none"> <li>• <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a>, ILO (2019)</li> </ul>	-

## Worker engagement

	Tools	Templates
<b>Grievance Management Systems</b>	<ul style="list-style-type: none"> <li>• <a href="#">Migrant Worker Guidelines for Employers</a>, IOM (2022)</li> <li>• <a href="#">Operational guidelines for Businesses on Remediation of Migrant-worker Grievances</a>, IOM (2021)</li> <li>• Annex K: Grievance Procedure Best Practices, <a href="#">Code of Conduct &amp; Auditable Standards: Tuna Handbook</a>, Seafood Task Force (2020)</li> </ul>	<ul style="list-style-type: none"> <li>• Grievance Reporting Form, <a href="#">Grievance and Remediation Management Tool</a>, IOM</li> <li>• Investigation Report Form, <a href="#">Grievance and Remediation Management Tool</a>, IOM</li> <li>• Remediation Action Form, <a href="#">Grievance and Remediation Management Tool</a>, IOM</li> </ul>
<b>Worker engagement</b>	<ul style="list-style-type: none"> <li>• <a href="#">OECD Due Diligence Guidance for Responsible Business Conduct</a>, OCED (2018)</li> <li>• <a href="#">Operational guidelines for Businesses on Remediation of Migrant-worker Grievances</a>, IOM (2021)</li> </ul>	<ul style="list-style-type: none"> <li>• Worker Feedback Form, <a href="#">Grievance and Remediation Management Tool</a>, IOM</li> <li>• <a href="#">Tool 10 – Conducting Migrant Worker Interviews</a>, <a href="#">Seafood Sector Toolset</a>, the Responsible Sourcing Tool (RST)</li> </ul>

## Appendix III: Glossary

Term	Definition	Source
<b>Debt Bondage</b>	A situation in which workers are bound in debt to a person or institution resulting from inherited debt, wage advances or loans to cover recruitment or transport costs or from daily living or emergency expenses, such as medical costs.	-
<b>Due diligence</b>	An ongoing process that businesses should carry out to identify, prevent, mitigate, and account for how they address their impacts on human rights.	<a href="#">UN Guiding Principles on Business and Human Rights</a>
<b>Fisher</b>	Every person employed or engaged in any capacity or carrying out an occupation on board any fishing vessel, including persons working on board who are paid on the basis of a share of the catch but excluding pilots, naval personnel, other persons in the permanent service of a government, shore-based persons carrying out work aboard a fishing vessel and fisheries observers.	ILO C188 <a href="#">Work in Fishing Convention, 2007 (No. 188)</a>
<b>Forced labour or Compulsory labour</b>	All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.	<a href="#">International Labour Organisation</a>
<b>Gender-based violence</b>	Violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.	ILO C190 <a href="#">Violence and Harassment Convention, 2019 (No. 190)</a>
<b>Grievance</b>	A perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities.	<a href="#">United Nations Guiding Principles (UNGPs)</a>
<b>Grievance mechanism</b>	Any routinised, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought.	<a href="#">United Nations Guiding Principles (UNGPs)</a>
<b>Human trafficking or Trafficking in persons</b>	The recruitment, transportation, transfer, harbouring, or receipt of people through force, fraud, or coercion, for the purpose of exploitation.	Article 3(a), United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, 2000 (UN Protocol)
<b>Labour agency</b>	Refer to all layers of intermediaries that directly engage with or employ workers in providing recruitment or employment services to enterprises. These agencies can take many forms, whether public or private, as intermediaries or sub-agents, or operating within or outside legal and regulatory frameworks. These include:	-

	<ul style="list-style-type: none"> <li>• <b>Recruitment agencies</b> who serve as intermediaries to recruit and place workers in employment.</li> <li>• <b>Employment agencies</b> who employ workers and place them at the disposal of use enterprises.</li> <li>• <b>Sub-Agents</b> who conduct recruitment activities and source workers on behalf of a partner recruitment agency.</li> </ul>	
<b>Recruitment fees or related costs</b>	Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.	ILO <a href="#">General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs</a>
<b>Remediation</b>	The process of addressing and correcting violations of labour rights, including providing remedies for affected workers.	-
<b>Slavery</b>	<p>The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.</p> <p>Slavery is an institution of complete ownership, in which an individual is subjected to the full control of the slave owner who can make decisions for this individual on education (attending school or not), work (type and conditions) or even private life (who to marry).</p>	Article 1(1), League of Nations Convention to Suppress the Slave Trade and Slavery (the Slavery Convention), 1926
<b>Violence and harassment</b>	A range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm.	ILO C190 <a href="#">Violence and Harassment Convention, 2019 (No. 190)</a>
<b>Worker engagement</b>	Activities that enable workers to interact with employers regarding workplace culture, working conditions, and other issues.	-

## Appendix IV: Roles and responsibilities

This Appendix assigns responsibilities for each Minimum requirement to different stakeholders to clarify how to successfully implement and apply them.

Category	Stakeholder	Key responsibilities	Relevant Minimum requirements
Governments	Flag State	<ul style="list-style-type: none"> <li>Enforce national legislation to ensure vessels flying its flag meet human rights and labour standards.</li> <li>Ratify relevant international conventions and regional frameworks, such as ILO's C188 Work in Fishing Convention (2007).</li> <li>Control and monitor operations of vessels flying its flag.</li> </ul>	These policy guidelines have been developed for fishing companies. Meeting the <b>Minimum</b> practices will support companies in ensuring ongoing compliance with the regulations set by the flag state and port states.
	Port States	<ul style="list-style-type: none"> <li>Inspect incoming vessels under international conventions and applicable regulations.</li> <li>Verify fishers' working conditions, crew certification, and occupational health and safety implementation.</li> <li>Enforce or deny port access if violations occur.</li> </ul>	
Industry association	FFIA	<ul style="list-style-type: none"> <li>Set industry-specific standards and guidelines that promote human rights and labour standards.</li> <li>Build capacity and provide training opportunities for member companies.</li> <li>Share knowledge, successful case studies and best practices within the industry.</li> <li>Monitor compliance and create industry-wide monitoring mechanisms (e.g., audits, certifications, or reporting requirements, etc.) to uphold accountability.</li> <li>Engage with government agencies to advocate for industry-specific legislation, policies and support that protect workers and human rights.</li> <li>Engage with other stakeholders, including workers' representatives and unions, and NGOs to promote human rights safeguards within the industry.</li> </ul>	<ul style="list-style-type: none"> <li><b>M13</b>, Section 4.1 Responsible recruitment guidelines.</li> </ul>
Employers (Vessel owners or operators)	Company	Companies are responsible for meeting all <b>Minimum</b> practices throughout these guidelines. Companies are encouraged to work toward implementing the <b>Good</b> and <b>Best</b> practices.	
	Board and/or senior management	<ul style="list-style-type: none"> <li>Own and champion company's human rights commitments, including the Human Rights Policy and related procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Accountability over all <b>Minimum</b> practices</li> </ul>

		<ul style="list-style-type: none"> <li>Allocate resources for implementation and continuous improvement.</li> <li>Regularly discuss human rights strategies and management.</li> </ul>	<p>throughout these guidelines.</p> <ul style="list-style-type: none"> <li><b>M1</b>, Section 4.1 Responsible recruitment guidelines.</li> </ul>
	<b>Operations (Vessel management)</b>	<ul style="list-style-type: none"> <li>Implement and ensure compliance with company human rights and labour standards while at sea.</li> <li>Maintain vessel safety and seaworthiness, including safety equipment, qualified and sufficient crew, accommodation on board, etc.</li> <li>Cooperate with the Health and Safety department and/or worker committees to identify, assess and mitigate occupational health and safety risks at sea.</li> <li>Communicate the crew's feedback and grievance with the management or relevant departments.</li> </ul>	<ul style="list-style-type: none"> <li><b>M2 – M12</b>, Section 4.1 Responsible recruitment guidelines, especially relating to implementation on board vessels.</li> </ul>
	<b>Human Resources (HR)</b>	<ul style="list-style-type: none"> <li>Incorporate company human rights and labour standards in workers' employment contracts and supplier codes of conduct and service agreements.</li> <li>Identify responsible suppliers (including vessel operators and labour agencies) to partner with.</li> <li>Perform due diligence and verify that suppliers respect and comply with the company's human rights and labour standards.</li> <li>Provide and manage grievance mechanisms and support systems for workers.</li> </ul>	<ul style="list-style-type: none"> <li><b>M2 – M12</b>, Section 4.1 Responsible recruitment guidelines.</li> <li><b>M1 – M5</b>, Section 4.2 Minimum standard for crew recruiters.</li> <li><b>M1 – M7</b>, Section 4.3 Worker engagement channels &amp; grievance mechanisms.</li> </ul>
	<b>Compliance</b>	<ul style="list-style-type: none"> <li>Ensure compliance with all applicable international conventions, regional frameworks, and national legislation.</li> <li>Maintain documentation for inspection and reporting.</li> <li>Manage responses to non-compliance.</li> </ul>	<ul style="list-style-type: none"> <li><b>M1</b>, Section 4.1 Responsible recruitment guidelines.</li> <li><b>M1</b>, Section 4.2 Minimum standard for crew recruiters.</li> </ul>
<b>Crew</b>	<b>Captains</b>	<ul style="list-style-type: none"> <li>Ensure safe navigation and fishing operation, including monitoring crew welfare and discipline, vessel safety and seaworthiness.</li> <li>Serve as the first point of contact for grievance or complaints onboard.</li> </ul>	<ul style="list-style-type: none"> <li><b>M2, M5 – M7, and M11 – M12</b>, Section 4.1 Responsible recruitment guidelines, especially relating to implementation on board vessels.</li> </ul>

			<ul style="list-style-type: none"> <li>• <b>M1 – M7</b>, Section 4.3 Worker engagement channels &amp; grievance mechanisms, especially relating to implementation on board vessels.</li> </ul>
	<b>Chief Officers or senior crew</b>	<ul style="list-style-type: none"> <li>• Assist the captains in fishing operations and safe navigation, including onboard training, safe fishing gear handling, and work and rest schedule implementation.</li> <li>• Facilitate onboard communications, especially between the captain and junior crew.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>M2, M5 – M7, and M11 – M12</b>, Section 4.1 Responsible recruitment guidelines, especially relating to implementation on board vessels.</li> <li>• <b>M1 – M7</b>, Section 4.3 Worker engagement channels &amp; grievance mechanisms, especially relating to implementation on board vessels.</li> </ul>
	<b>Fishers</b>	<ul style="list-style-type: none"> <li>• Respect onboard operational and safety rules, including PPE use, shift schedules, and emergency procedures.</li> <li>• Report issues, suggestions, or grievance to supervisors or available company managers.</li> </ul>	Companies are responsible for educating fishers about their rights and protections that they are entitled to under these frameworks.

## Appendix V: Types of remedies available

This is a non-exhaustive list of the most common types of remedies available based on the UN Guiding Principles (“UNGPs”).

Remedy	Definition	When are they triggered
<b>Restitution</b>	Restoring the aggrieved party to his/her original situation (before the violation of rights).	When it is possible to reverse the harm caused, e.g., return of property or job reinstatement.
<b>Compensation and financial assistance</b>	Paying an aggrieved party to fairly remedy any damage suffered.  Financial assistance may be particularly important when the aggrieved party has not received any payment and/or has incurred debts to secure their job, for instance, to pay recruitment fees.	When wage withholding, illegal deductions, or debt bondage are identified.
<b>Satisfaction</b>	Verifying and acknowledging the violation of the aggrieved party’s rights and ensuring the violation stops.	When formal recognition of harm caused is crucial to showing respect for workers’ dignity and healing. It often accompanies other remedies.
<b>Undertakings of non-repetition</b>	Implementing comprehensive measures to prevent future violations.	When systemic forced labour risks that requires comprehensive preventive measure are identified.
<b>Shelter and accommodation</b>	Providing short-term emergency shelter and longer-term accommodation.	When workers have no safe place to stay after escaping forced labour.
<b>Medical and health-care services and counselling</b> (including mental health and psychosocial support)	Providing aggrieved parties full access to comprehensive health care. Such health care should be based on informed consent and should be culturally appropriate.	When workers suffer physical or psychological harm due to forced labour or other social non-compliances caused or contributed to by the employer.
<b>Legal assistance</b>	Informing aggrieved parties of legal options, including participation in civil and criminal legal proceedings, if appropriate, and action to address an aggrieved party’s immediate needs.  Aggrieved parties need to be informed of the possibility of cooperating with law enforcement agencies, the possibility of acting as witnesses in criminal proceedings and the legal	When workers wish to pursue legal remedies or need protection from retaliation.

	options available for their protection if they act as witnesses. Aggrieved parties should also be informed about possible civil proceedings, including for the restitution of their belongings and compensation for harm and injury suffered. Aggrieved parties may also need support to determine and/or regularize their immigration and labour status.	
<b>Return assistance</b>	Supporting the voluntary and safe return of aggrieved parties to their communities of origin.	When workers are stranded, trafficked, or forced to work far from home without consent.
<b>Reintegration services</b>	Assisting reintegration. Upon return, aggrieved parties should be able to access various forms of reintegration assistance (for example, reinsertion into the educational system, vocational training, microenterprise development, health care and counselling).	When workers are released but face barriers to sustainable livelihood.