

# CGF Human Rights Coalition – Working to End Forced Labour

Maturity Journey Framework for Human Rights Due  
Diligence (HRDD) Systems Focused on Forced  
Labour in Own Operations: Version 1.2

May 2022



Human Rights  
Ending Forced Labour

# Contents

Section	Content	Page
Section 1	Introduction to the CGF Human Rights Coalition – Working to End Forced Labour	3
Section 2	Introduction to the HRDD in Own Operations Maturity Journey Framework	7
	The HRC Charter Commitment	8
	Key Definitions	9
Section 3	The HRDD in Own Operations Maturity Journey Framework	12
• Overview	HRDD Steps, Minimum Criteria & Maturity Journey	14
• HRDD Step 1	Policy Commitment & Governance	15
• HRDD Step 2	Assess Human Rights Potential and Actual Impact	16
• HRDD Step 3	Integrate and Act in Order to Prevent & Mitigate	17
• HRDD Steps 4-6	Track the Effectiveness of Responses, Report, and Remedy	18
Annex	CGF Priority Industry Principles Convergence with International Agreements	19





# **Section 1: About the CGF Human Rights Coalition – Working to End Forced Labour**

# About the CGF Human Rights Coalition – Working to End Forced Labour (HRC)



- ▶ Forced labour is an endemic social problem riddled throughout supply chains globally. 25 million individuals are victims of forced labour today. It is one of the most profitable global crimes and a problem of this magnitude cannot be solved by one person, company or industry acting alone.
- ▶ The Human Rights Coalition – Working to End Forced Labour is uniquely positioned to drive the social sustainability conversation forward and help implement actions that lead to positive impacts. CEO-led, we work to achieve decent working conditions across the consumer goods industry and worldwide. To help us accomplish this aim we have set voluntary industry commitments such as our resolution on the eradication of forced labour. We also developed the Priority Industry Principles which highlight the three key standards the industry must adopt to respect the rights of workers: that all workers should have freedom of movement, no one should have to pay for a job, and no one should be indebted or coerced to work.
- ▶ Today, our work is focused on advancing our Forced Labour Resolution and its Priority Industry Principles in alignment with the UN Guiding Principles on Business and Human Rights. We will drive individual and collective action in our businesses and supply chains to:
  - ▶ Implement Human Rights Due Diligence (HRDD) Systems
  - ▶ Support Responsible Recruitment markets
  - ▶ Support a focused movement with all relevant stakeholders to jointly expedite the elimination of forced labour
- ▶ To help ensure implementation across the Coalition, and in support of wider industry progress, we will harness the power of collective action as an industry group to identify and address issues and geographies of shared concern, enhancing the efficiency of any individual company initiatives in this area. In areas of shared concern, we will jointly develop specific action plans supporting the eradication of forced labour, in alignment with the widely embraced guidance provided by the UN Guiding Principles on Business and Human Rights.

# Members & Governance

- ▶ **Co-Sponsors: Steve Rowe, CEO, Marks & Spencer**
- ▶ **Co-Chairs: Veronika Pountchikova**, Global Director Corporate Responsibility, Senior Vice President, METRO AG, and **Paul Lalli**, Global Director of Human Rights, The Coca-Cola Company



# Partnerships



- ▶ The Human Rights Coalition – Working to End Forced Labour (HRC) works closely with the **CGF’s Sustainable Supply Chain Initiative (SSCI)** as the SSCI provides alignment and insights on the industry's expectations for social sustainability standards in managing their auditing/certification programmes.
- ▶ The HRC also works with the CGF’s **Forest Positive Coalition** to help ensure the the Forest Positive Coalition’s Theory of Change, Roadmaps and strategies are aligned with the CGF’s **Priority Industry Principles** against forced labour.







## **Section 2: About the CGF HRC Framework on Human Rights Due Diligence (HRDD)**

# The CGF HRC Charter Commitment



- ▶ Forced labour remains difficult to detect and measure, meaning traditional assessment methods do not capture the full extent of the problem thus hindering both business decision making and governmental policies to efficiently target the issue. Furthermore, current efforts to address forced labour are mixed and patchy. This gap in data on the true scale of forced labour risks, and the lack of robust approaches to tackling the problem, inevitably often leads to weak and untargeted mitigation efforts.
- ▶ Therefore, CGF members of the Human Rights Coalition - Working to End Forced Labour (HRC) commit, as a contribution to the fight against forced labour, to activate and implement the following objective targeting its eradication: **Establish and deploy HRDD systems focused on forced labour in our Own Operations with the aim of reaching 100% coverage by 2025**
- ▶ Human Rights Due Diligence (HRDD) system consists of the processes that aid business to become aware of the actual and potential human rights impacts associated with their business, which enables them to prioritise and manage the areas of greatest risk and leverage.
- ▶ Deploying a HRDD system focused on forced labour in own operations should allow us to have more visibility of and work on interconnected human rights pertaining to forced labour issues or risks. While there are many human rights risks or issues that shall be considered, forced labour has been identified as the most salient human rights risk that our industry is being commonly challenged with. We will therefore at this stage tailor our HRDD framework to specifically detect risks and cases of forced labour and to provide a consistent and targeted approach at industry level.



Key Definitions: Term	Definition
“Own Operations” (CGF Definition)	Defined as the company itself, the entities it owns, the entities in which it holds a majority of voting shares and the facilities it manages. Contractors, sub-contractors or agencies supplying a company with labour or services in facilities that that company directly manages should also implement similar employment practices so as to mitigate the risks of forced labour.
Addressing Forced Labour for workers in “Own Operations” (CGF Definition)	<p>For the purposes of identifying and addressing forced labour risks to workers within own operations, the definition of “worker” should include any labour employed directly by the member company and should include any third-party labour engaged by contractors or labour agencies for the performance of regular and ongoing work in own operations. Coalition members should disclose the specific scope of third-party workers included in their commitments, assessments, reporting and other HRDD actions. E.g.</p> <ul style="list-style-type: none"> <li>• Outsourced temporary or seasonal workers</li> <li>• Security</li> <li>• Cleaning</li> <li>• Kitchen/catering</li> </ul> <p><i>Note: these identified workers categories are not intended to be the authoritative or exhaustive list of “worker”.</i></p>
Human Rights Due Diligence (HRDD)  (UN Guiding Principles Reporting Framework definition)	Due Diligence is an ongoing risk management process to identify, prevent, mitigate and account for how a company addresses its actual and potential human rights impacts. The guidance recommends four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.
Human rights issues / risks  (UN Guiding Principles Reporting Framework definition)	Human rights risks refer to the potential adverse impacts that a company can have on the enjoyment of human rights.

Priority Industry Principles  
(PIPs)  
(CGF Definition)

While certain employment and recruitment practices may not initially appear problematic, in aggregate or combined with other forms of leverage, they can result in forced labour, particularly among vulnerable workers (e.g. a non-exhaustive list: women, migrant workers, LGBTQI, seasonal/daily/casual workers, people with disabilities, and others). The principles that have been identified by members of The Consumer Goods Forum cover three of the most problematic, yet often common employment practices across the world that can lead to cases of forced labour. We will take active measures to apply these Principles across our global value chains and own operations, to cases where such practices may lead to forced labour.

The Priority Industry Principles (PIPs) state that:

- Every Worker should have freedom of movement;
- No Worker should pay for a job;
- No Worker should be indebted or coerced to work.

The Priority Industry Principles are consistent with the forced labour principles of the ILO declaration on fundamental principles and rights at work which are informed by the ILO [Forced Labour Convention, 1930 \(No. 29\)](#), and the 3 PIPs cover the [11 ILO indicators of Forced Labour](#). Please see more in Annex 1.

Please see the full text of the PIPs and the guidance document which provide further context to the Principles and a few starting points on where companies can get started, and practical actions they can take. This document is intended as guidance only and should not be considered as normative. The examples listed are illustrative and non-exhaustive: <https://www.theconsumergoodsforum.com/wp-content/uploads/2018/05/Guidance-on-the-Priority-Industry-Principles.pdf>

# Purpose of This Document



- ▶ This document aims to provide a program maturity journey to address forced labour through human rights due diligence in an organisation's own operations. In line with the CGF Human Rights Coalition – Working to End Forced Labour's focus on forced labour, this journey places a deliberate emphasis on actions which aim to identify and address forced labour risks. In some instances, the steps outlined below may go beyond or be more specific than the guidance of the UN Guiding Principles.





# Section 3: The HRDD in Own Operations Maturity Journey Framework

# HRDD Steps, Minimum Criteria, and Stages of Maturity

The HRDD Steps aim to define a set of minimum criteria members should strive to achieve at each of the 3 stages of maturity.\*

These minimum criteria are cumulative from stage 1 to 3, and companies report into the reporting framework what steps they have taken to fulfill each level as well as identifying any implementation gaps and their future plans to address them. Such data will be aggregated for external reporting. Reporting will initially be internal only.

- **Launched:** Initial, basic steps towards human rights due diligence addressing forced labour risks in own operations are in place and provide a foundation for future programme growth.
- **Established:** A functional human rights due diligence programme addressing forced labour risks for own operations is in place and is actively deployed for prioritised locations.
- **Leadership:** A human rights due diligence programme for forced labour risks in own operations is in place for all locations and delivering outcomes for vulnerable workers.

By the end of 2025, all CGF Human Rights Coalition – Working to End Forced Labour members should aim to reach the ‘Leadership’ level in order to meet the Coalition charter commitments on HRDD for forced labour in own operations.

\*The CGF HRC Maturity Journey Framework on Human Rights Due Diligence (HRDD) in Own Operations was inspired by the [AIM-Progress Responsible Sourcing Journey](#) (RSJ), a maturity roadmap for companies to help them progress their responsible sourcing programs.

# HRDD Step 1

HRDD Steps	Maturity Level 1 (Launched)	Maturity Level 2 (Established) <i>In Addition to Launched</i>	Maturity Level 3 (Leadership) <i>In Addition to Established</i>
<b>1. Policy Commitment and Governance</b>	<p>1. a. There is a publicly available commitment against forced labour aligned with the Priority Industry Principles (PIPs) stating:</p> <p><i>Every Worker should have freedom of movement; No Worker should pay for a job; and No Worker should be indebted or coerced to work</i></p>	<p>1. a. There is a publicly available Human Rights Policy that refers to the PIPs and the UNGPs, or other internationally recognised instrument pertaining to forced labour risks.</p>	<p>1. a. The Board or equivalent of the Company is assigned official responsibility for the monitoring of the Human Rights Policy.</p>
	<p>1. b. Governance and management systems are developed to be conducive of the commitment against forced labour.</p>	<p>1. b. Governance and management systems are established to be conducive of the commitment against forced labour relating to direct labour in own operations and begins to expand to any third-party labour engaged by contractors, sub-contractors or labour agencies for the performance of ongoing work in own operations.</p> <p>Management responsibility related to addressing forced labour risks is clearly defined including risks associated with recruitment, covering direct and third-party labour.</p>	<p>1. b. Governance and management systems are established to be conducive of the commitment against forced labour relating to direct labour in own operations and have expanded to any third-party labour engaged by contractors, sub-contractors or labour agencies for the performance of ongoing work in own operations.</p>



# HRDD Step 2

HRDD Steps	Maturity Level 1 (Launched)	Maturity Level 2 (Established) <i>In Addition to Launched</i>	Maturity Level 3 (Leadership) <i>In Addition to Established</i>
<p><b>2. Assess Human Rights Potential and Actual Impacts</b></p>	<p>2. a. A process to identify forced labour risks in own operations is being developed. The process should include assessing actual and potential human rights impacts.</p> <p>2. b. Assessment processes and tools (e.g. risk evaluation, audits, etc.) are being developed. Their scope includes forced labour related risks (including as a minimum, passport retention, recruitment fees, any form of coercion).</p>	<p>2. a. The forced labour risks and potential and actual human rights impacts in own operations are identified.</p> <p>2. b. Forced labour assessment processes and tools are actively and regularly conducted in prioritised own operations globally, including direct and third-party labour. At a minimum, assessments must identify potential risks related to forced labour (including passport retention, recruitment fees, any form of coercion).</p>	<p>2. b. Forced labour assessment processes and tools are actively and regularly conducted covering full scope of own operations globally (including areas such as warehouses and logistics sites and all offices, etc.) including direct and third-party labour. Companies may deploy different processes and tools in particular parts of their own operations, depending upon risk.</p>

# HRDD Step 3

HRDD Steps	Maturity Level 1 (Launched)	Maturity Level 2 (Established) <i>In Addition to Launched</i>	Maturity Level 3 (Leadership) <i>In Addition to Established</i>
<p><b>3. Integrate and Act in Order to Prevent and Mitigate</b></p>	<p>3. a. With the governance and management system in place, the forced labour commitment is communicated internally and relevant staff (e.g. Procurement / Human Resources) trained.</p> <p>3. b. A grievance mechanism that is guided by the UNGPs, for direct labour is being developed.</p>	<p>3. a. Immediate steps are taken to mitigate forced labour issues relating to direct labour identified through the assessment processes and grievance mechanisms, including through training and education.</p> <p>3. b. As identified through the assessment processes and established grievance mechanisms, necessary actions are taken, with relevant contractors, sub-contractors or labour agencies for them to mitigate forced labour risks relating to their direct labour working regularly on own prioritised sites.</p>	<p>3. b. Grievance mechanisms are extended to third-party labour working regularly on own sites either through own or the contractors', sub-contractors' or labour agencies' mechanism.</p> <p>As identified through the assessment processes and established grievance mechanisms, necessary actions are taken, with relevant contractors, sub-contractors or labour agencies for them to mitigate forced labour risks relating to their direct labour working regularly on all own operation sites.</p>

# HRDD Steps 4-6

HRDD Steps	Maturity Level 1 (Launched)	Maturity Level 2 (Established) <i>In Addition to Launched</i>	Maturity Level 3 (Leadership) <i>In Addition to Established</i>
<b>4. Track the Effectiveness of Responses</b>	4. Awareness raising and training activities regarding forced labour risks, including number of workers, labour agencies, contractors or sub-contractors reached are being recorded.	4. Outputs relating to addressing forced labour risks are monitored and impact tracked over time: e.g. compliance status, action plan implementation.	4. Outcomes relating to addressing forced labour risks are monitored and impact tracked over time: e.g. reduction in number of grievances received by facility; reduction in recruitment fees paid by workers, if any, etc.
<b>5. Report</b>	5. There is annual public reporting about the Company's approach to forced labour and future implementation plans (e.g. as a stand-alone exercise, as part of the sustainability reporting, modern slavery statements etc.)	5. There is annual public reporting about the Company's approach to addressing forced labour through HRDD.	5. Annual public reporting includes: issues related to forced labour found in company's own operations identified through HRDD, the mitigation steps taken and outcomes.
<b>6. Remedy</b>	6. Effective remediation measures for forced labour impacts are being explored, including through collaborative actions.	6. Remediation processes are in place for addressing forced labour in own prioritised operations. Necessary actions are taken, with relevant contractors or labour agencies for them to address forced labour relating to their direct labour working regularly on own prioritised sites.	6. Remediation processes are in place for addressing forced labour for all own operations. Necessary actions are taken, with relevant contractors/labour agencies etc., on a risk basis, to enable them to address forced labour relating to direct labour working regularly on all own operations' sites.



# Annex 1: CGF Priority Industry Principles Correspondance with International Frameworks

ILO Indicators of Forced Labour	CGF Priority Industry Principle Coverage
Abuse of vulnerability	PIP #1, #2, #3
Deception	PIP #3
Restriction of movement	PIP #2
Isolation	PIP #1
Physical and sexual violence	PIP #2
Intimidation and threats	PIP #2
Retention of identity documents	PIP #2
Withholding of wages	PIP #3
Debt bondage	PIP #1, #3
Abusive working and living conditions	PIP #3
Excessive overtime	PIP #3

Dhaka Principles for Migration with Dignity	CGF Priority Industry Principle Coverage
No fees are charged to migrant workers	PIP #2
All migrant worker contracts are clear and transparent	PIP #3
Policies and procedures are inclusive	PIP #3
No migrant workers' passports or identity documents are retained	PIP #1
Wages are paid regularly, directly and on time	PIP #3
The right to worker representation is respected	
Working conditions are safe and decent	
Living conditions are safe and decent	
Access to remedy is provided	
Freedom to change employment is respected, safe return guaranteed	

**Contact the  
Coalition**

**Learn more about our work to  
eradicate forced labour from  
consumer goods supply chains  
worldwide.**



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