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Covid-19 & Social Audits: What Have We Learnt?

AUTHORS

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	4
COVID-19 & MODERN SLAVERY	4
Insights from Industry: Remote Auditing.....	5
How are companies responding to these challenges?	6
INTRODUCING APPRISE AUDIT: INTERVIEWING WORKERS IN SUPPLY CHAINS	9
Why worker interviews?	9
The Apprise Audit Platform	11
Workflow	11
REMOTE AUDITING CAPABILITIES	13
Insights from Industry: Using Apprise Audit	13
What first makes companies interested in Apprise Audit?	13
How do companies typically use Apprise Audit?	13
Do companies usually use the QR code function and/or the smartphone app to deliver the interviews?	14
Do companies inform factory management/suppliers that they will be using Apprise Audit? How does this communication usually happen if so?	15
How do companies incorporate the Apprise survey results into their decision-making processes?	15
Are companies finding value in looking at the survey data on an aggregate level over time?.....	16
Do companies share survey results with factory management? How does this usually happen?.....	16
Approximately how many surveys (or % of workforce) does any one user undertake at each visit?.....	16
Do you find that using Apprise Audit increases or decreases the man-hours needed per audit?.....	16
Are companies incorporating responses from the survey into the final audit report as a new official "evidence" point?	17
How do companies reconcile when the survey responses contradict what the auditor finds from document review and in-person interviews?.....	17
What makes Apprise Audit different from other worker voice platforms or technologies?	18
Case Study 1	18
Case Study 2	18
Case Study 3	18
Case Study 4	18
Case Study 5	19
Data collected during Covid-19.....	19
Have you received health & safety training on Covid-19 from your employer?	23
Are there restrictions on you leaving the factory/dormitory due to Covid-19?	23
Do you feel it is possible to safely social distance yourself from others while in your workplace?	23
Has your pay rate reduced due to Covid-19?	23
Have your working hours been reduced due to Covid-19?	23
INSIGHTS FROM INDUSTRY: THE FUTURE OF SOCIAL AUDITING	24
How can technology play a role going forward?	24
CONCLUSION.....	25

EXECUTIVE SUMMARY

This paper examines the impact that the Covid-19 pandemic has had on global supply chains, from a modern slavery perspective. It particularly focuses on how modern slavery has impacted the ability of companies to conduct social audits and reach workers within their supply chains. We consider the use of technology to overcome the disruption caused by Covid-19, with a focus on Apprise Audit, a piece of worker engagement technology developed by the Mekong Club and United Nations University Institute in Macau. This paper includes interviews and testimonials from global companies as well as extracts from worker interview data sets collected by the Apprise Audit platform.

Social audits are audits conducted by an impartial auditing body. They examine whether a business and every player in the supply chain abide by key principles for respecting human rights and providing employees with decent working conditions. Social audits are an efficient approach to mitigate risk in your supply chains, strike a balance between corporate social responsibility and business success, and ensure compliance with international labor welfare standards.

Our key findings:

Most companies found that Covid-19 negatively impacted their ability to conduct social audits effectively, with the inability to travel identified as the most prevalent challenge.

Most companies incorporated some degree of 'remote auditing' to overcome these challenges. This approach had mixed degrees of success, with technical issues and lack of trust leading many to question the long-term viability of this practice.

Companies are generally keen to incorporate new technological solutions into their auditing processes, but wish to do so without creating an over-reliance on technology.

Through Apprise Audit, we interviewed thousands of workers during the Covid-19 pandemic.

Of the sample data set that we have used in this paper:

29% of interviews of factory workers conducted raised at least one indicator of forced labour risk.

The average number of indicators raised per interview was 2.5. Typically, therefore, if a worker is po-

tentially at risk, they are typically displaying more than one ILO indicator of forced labour at once.

Companies own the data and the entire process, including the decision to identify, mitigate, and remediate any risks captured by the use of Apprise tool. This emphasizes how important it is for businesses to understand and be aware of the risks associated with labor rights, as well as what appropriate measures or corrective actions are. Technology is not a stand-alone tool or a panacea for ending forced labor. The private sector also needs policy development, governance structures, grievance mechanisms, and a stakeholder engagement process to monitor how identified risks are dealt with. In this case of utilizing Apprise, the Mekong Club does not have authoritative rights to data or to make the final decision on how the companies will address the risks. It only has the ability to effectively identify indicators of risk and provide recommendations on what can be done to address them.

COVID-19 & MODERN SLAVERY

From small towns to major cities, the Covid-19 pandemic has taken its toll, devastating industries, closing schools, and affecting the everyday lives of people. One of the most deeply felt impacts of the health crisis is the economic fallout resulting in widespread unemployment and increasing poverty rates. Combined with border closures and travel disruptions, the financial crisis has exacerbated already-existent modern slavery risks in the global supply chain.

At the outset of the pandemic, the ILO estimated an increase in global unemployment by 25 million people. Many workers dependent on daily wages, especially cross-border migrants supporting families in their home country, began turning to risky or exploitative employment options. Many global retailers in Bangladesh, for example, laid off thousands of workers while significantly reducing the pay of those who managed to retain their jobs. As debt began to build and workers were forced to borrow at high interest rates to pay off their recruitment fees, they became financially vulnerable targets of exploitation.

For those already exploited, Covid-19 heightened risk in the global supply chain by further impeding freedom of movement due to such government-mandated measures as country- and city-wide lockdowns and border closures. In some cases, living and working conditions were not adjusted to reduce workers' exposure to the virus, placing them in situations that compromised their health and wellbeing.

While the pandemic amplified the principal drivers of modern slavery, such as financial burdens and restriction of movement, it also increased risk on a much larger scale by forcing countries to turn to suppliers suspected of using forced labour in order to reduce the disparity between supply and demand of critical medical equipment. In one such case, U.S. Customs and Border Protection removed a hold on the importation of disposable rubber gloves from a company in Malaysia previously accused of withholding wages from workers.

Unfortunately, as risk has increased, the means to detect this risk has decreased. Lockdowns, quarantines, and other travel-related measures have posed a significant challenge to conducting in-person social audits. Covid restrictions rendered unannounced audits nearly impossible, and without on-ground audit teams stationed in every location, the frequency of audits diminished significantly. The absence of face-to-face interaction with workers limits the ability of auditors to pick up on sensory indicators of forced labour. This unprecedented situation thereby necessitates a tool adapted to pandemic conditions which assists in remote audits and provides an accurate picture of on-the-ground working conditions.

Insights from Industry: Remote Auditing

We interviewed 12 companies in order to understand how Covid-19 has impacted their social auditing processes in the short and longer terms, as well as the role that technology has played in their responses to these challenges. This was achieved through providing a written survey to each of the 12 companies, with one company representative (data coordinator) then coordinating with their teams to provide the required data. Where needed, we then had follow-up conversations to clarify any missing details and to ensure that the company responses were complete and well understood.

In order to ensure confidentiality of the data due to the sensitive nature of this topic, these results have been anonymised. The companies involved in this activity were all large multinational organisations that span many countries both through their operations and supply chains. Primarily, our work with these companies focused on their Asia-Pacific supply chains, with common countries of production including China, India, Bangladesh, Cambodia, Vietnam, Taiwan, Thailand, Indonesia, and Malaysia, amongst others. Key markets of import/sales for this group of companies include the EU, North America, the UK, China, and Australia.

The companies involved represented 'buyers' such as retail brands and distributors as well as 'suppliers' involved in manufacturing.

The companies interviewed represented the following industries:

A. SUPERMARKET RETAIL

- Number of companies interviewed: 2
- Job title of data coordinators: Human resources manager (F), Corporate Responsibility Manager (M), Project Manager (F)
- Companies interviewed head office location: Germany, United Kingdom

B. MEDICAL SUPPLIES/PHARMACEUTICALS MANUFACTURING

- Number of companies interviewed: 2
- Job titles: Sustainability Manager (M), Quality Manager (F)
- Head Office Location: Germany, Singapore

C. HEALTHCARE

- Number of companies interviewed: 1
- Job titles: Contract Manager (F)
- Head Office Location: USA.

D. CLOTHING MANUFACTURING

- Number of companies interviewed: 3
- Job titles: Head of ESG (M), Senior Director Responsible Sourcing (M), Senior VP Vendor Compliance (F)
- Head Office Location: China, USA, Hong Kong

E. CLOTHING RETAIL

- Number of companies interviewed: 2
- Job titles: Head of ESG (M), Legal Manager (M)
- Head Office Location: China, USA

F. TOY MANUFACTURING

- Number of companies interviewed: 1
- Job titles: Managing Director (M)
- Head Office Location: Hong Kong

G. HEALTH & BEAUTY RETAIL

- Number of companies interviewed: 1
- Job titles: Sustainable Operations Manager (F)
- Head Office Location: UK

Most of the companies that we surveyed reported that Covid-19 negatively impacted their ability to conduct social audits. This varied slightly depending

on where the companies' teams, social auditors, and manufacturing facilities were situated. Those organisations with supply chains spanning across multiple countries, especially those who do not have on-ground audit teams in all locations, reported the most challenges.

The most frequently highlighted challenge was the inability to physically travel to reach factories and production facilities as a result of travel restrictions and quarantine requirements. For most companies, this meant that in-person audits became totally impossible in certain jurisdictions.

“Travel restrictions and quarantine requirements in some countries impacted our ability to travel and conduct audits in person. We had to rely on the virtual audits and the documents review remotely to monitor the condition in the factories.”

Those who were able to conduct some level of in-person auditing reported challenges despite being able to send a staff member or third-party support to conduct those in-person sessions. They reported that the administrative burden and cost required to send somebody in-person to support an audit under pandemic conditions meant that the number of audits conducted diminished significantly. Unannounced audits also became much less frequent in many locations, as suppliers/factories were denying auditors access, citing Covid-19 restrictions that prohibited visitors from entering the premises.

“Especially at the beginning of the pandemic, local COVID-19 travel restrictions and concerns of COVID transmission have meant that access to factories was also more difficult and unannounced [audits] were no longer possible (e.g. factories would deny access to the auditor; auditors were unable to travel from/to certain locations).”

“We have continued to conduct [social audits] throughout the pandemic, albeit with an amended approach and in fewer numbers due to the administrative effort and timelines required for organization

and due no/limited access to factories in certain countries for longer time periods (e.g. factories in countries like Vietnam, Thailand were locked down for many months in 2020/2021 and not accessible).”

Countries in Asia Pacific that were highlighted by the companies surveyed as particularly impacted, in terms of ability to conduct in-person social audits, include:

- Vietnam
- Thailand
- Malaysia
- Bangladesh
- Cambodia
- India
- Indonesia
- Philippines
- Sri Lanka

With regards to China, two companies with extensive supply chains in the region reported that they were still able to conduct in-person social audits throughout the pandemic as they already had staff on-ground in China who were able to travel. This situation has changed at the time of writing this paper in June 2022, as there are some strict city-wide lockdowns with a total ban on movement in some cases. As a result of these stricter lockdowns, companies are now reporting that even on-ground teams are unable to visit certain provinces and as such are now required to either postpone audits or pivot to remote services.

How are companies responding to these challenges?

Incorporating some degree of remote auditing practice was identified as key to continuing social audits despite the challenges listed. This typically involved utilising video technology to engage with suppliers in order to ask them audit questions and conduct checks. In some cases, this was coupled with a virtual video-enabled walkthrough of the site, where auditors ask to view working areas to check for various health & safety measures (such as fire exits and sanitation areas). In a few cases, workers were interviewed over video call as part of the remote auditing.

Where possible, companies indicated a preference to have at least one company representative or third-party partner physically present at the factory during the remote audit. However, in many cases this

was not possible and companies were required to rely on only the information that could be gathered remotely.

“ In the later part of 2021, we developed a remote assessment programme, where factories self-assess some of the checkpoints on our audit checklist, then we conduct a video assessment to check certain elements, such as fire exits.”

The following technologies were identified as useful to companies in order to facilitate their remote auditing processes:

- TEAMS
- Zoom
- WeChat
- WhatsApp
- Email
- Smartphone video calls
- Apprise Audit (turn to page [13](#) to learn about this tool)

“ TEAMS was/is used as the main tool for communication with the 3rd party auditor, factory and supplier staff in off-site social audits. TEAMS, WeChat (and sometimes Whatsapp or email) are used for quick immediate messaging.”

“ Smartphone cameras were used to tour us through the dormitories to show us different implementations of our Covid guidelines.”

“ We are lucky to have cooperative, supportive suppliers to facilitate the virtual audit. We use all kinds of online meeting software that suppliers/factories could operate.”

Collaboration with third parties was also identified as a key tool. This included organisations such as [SEDEX](#) and [Better Work](#), who were implementing third-party remote auditing services.

“ We conducted desktop / virtual audits (using Zoom / Teams) for some exceptional cases. Also, our

external partners such as ‘Better Works’ also conducted virtual assessment or advisory service to our factories in case they cannot visit the factory physically.”

Many companies and their partners engaged with the remote auditing process for the first time as a result of the Covid-19 pandemic. Most were learning how to implement this new way of working under substantial pressure and uncertainty, at a time when many workers in their supply chains could be at risk. Most respondents indicated that this process was a learning experience, with a number of challenges identified along the way.

One of the most commonly reported challenges was the technical limitations faced, especially in more remote locations where Wi-Fi was unstable and access to advanced technology less available. Unstable or lack of internet connection is a very significant risk as this means that key data may not be communicated effectively, there may be a delay in data transmission, and there is a risk that people mishear and misinterpret each other. This technical challenge meant that audits could become very time consuming for those involved, and costly in cases where new technology needed to be purchased in order to facilitate the technological requirements. In cases where connectivity was bad, key information could be missed and it is challenging to clearly see the conditions of the factory during the walkthrough.

“ We found using technology sometimes unsuccessful because of a lack of stable internet connectivity across all areas of the site, difficulty in gaining a full picture of the site and the diversity of its workforce on the day, and limitations on the ability to conduct sensory verification from the auditor.”

Another commonly reported challenge was the superficial nature of the remote audits, as the factory or facility being audited has control over what the auditor sees. This meant that the experience is restricted to what the auditor can see on their computer screen, unlike in-person audits where the auditor can walk around the facility and see the workers, perhaps visit their living quarters, and deploy gut instinct. Being unable to speak with workers directly and conduct interviews meant that many felt that they were missing a crucial element of the audit. For the companies that we spoke with, a mixture of techniques were employed in order to conduct virtual assessments. In some cases, factory

managers were provided with a route map around which they were expected to walk, with a live video camera stream, for the company to view key sites such as fire exits, work stations, etc. In other cases, the company was able to send a local member of staff and/or a third-party auditor to conduct the review, although due to Covid-19 restrictions these were almost always 'announced' pre-planned audits which carry risk of factories pre-preparing and falsifying in order to pass the audit. Any video-streamed worker interviews conducted during the remote audits were done via a video camera set up by the factory management, and none reported setting up permanent cameras in the factory for monitoring or asking workers to send videos independently.

“ [A key issue that we found was we were unable to see] the living conditions of our onsite suppliers, e.g. security guards or cleaners, to evaluate their living conditions as well as the implementation of the Covid-19 [protective measures] in their living quarters.”

“ With travel restrictions, we could not do unannounced spot checks, only semi-announced virtual ones. On a virtual visit, even with the best quality network and camera, the connection and image are definitely not as clear as seeing it in person.”

Some companies reported that while the remote audits were useful, the limitations in their effectiveness meant that they did not consider them to fulfil all monitoring requirements and therefore still require an on-site visit when this possibility resumes.

“ For internal audits, we have conducted them remotely where an in-person visit is not possible. However, we require a local auditing partner to be on-site. For third party audits such as [those conducted by SEDEX], we have allowed remote audits to bridge the gap between full audits where the latter have been impossible, although we have not accepted remote audits as fulfilling our monitoring

requirements the way an on-site one would.”

“ Virtual audits were conducted via Zoom or Teams video call. It was successful in a way because we were able to connect with factory management and still communicate our expectations. But due to technical issues such as network connection and limitation in conducting Health and Safety audits, as well as limited interaction with workers, it was not as effective as onsite audits.”

The companies surveyed who had used remote audits during Covid-19 and found them to be successful, heralded the ability to continue to reach into their supply chain even despite Covid-19. While they acknowledge the challenges faced, many stated that without remote auditing they may have had no data or information whatsoever, so for that reason are thankful to have access to the technology mentioned.

“ The use of the aforementioned technologies has mostly been very successful and smooth. By now [our audit teams] and most factories and suppliers are very much used to/ familiar with using programs and apps such as TEAMS and WeChat. Internet connectivity/transmission has been an issue in certain locations and for certain activities (e.g. factory walk-through), but by switching between different platforms depending on what works, such challenges can usually be overcome.”

“ They allowed inspections to take place where they would otherwise not have been possible.”

“ Virtual audits helped to provide us with a certain level of visibility of factory on health and safety, working hours, wages, etc. [which we otherwise wouldn't have had].”

INTRODUCING APPRISE AUDIT: INTERVIEWING WORKERS IN SUPPLY CHAINS

This section of the paper examines the Apprise Audit platform, a system developed as a collaboration between the Mekong Club and United Nations University Institute in Macau. This technology was originally developed prior to the Covid-19 pandemic, in response to a number of identified challenges in interviewing workers during social audits. When the pandemic hit, we adapted this technology to be used as part of remote auditing processes by developing functionality that allowed workers to be interviewed using QR codes. Here, we explain the technology, how it was adapted for Covid-19 as well as key data and lessons learned from this process.

Apprise Audit improves forced labour victim identification by elevating workers' voices during factory inspections.

Why worker interviews?

Social compliance auditing is one of the key approaches that companies use to examine working conditions within factories and other facilities in their supply chains. Audits assess whether a workplace is functioning according to local law, company policy and ethical protocols. This form of 'ethical auditing' is estimated to be worth US\$80 million a year, with sources suggesting that companies devote up to 80% of their ethical sourcing budget to auditing alone. Within these audits, workers' interviews are usually a critical component, providing the voice of the employee on working conditions. This helps to determine whether exploitation exists in the workplace, highlights areas for further examination by an auditor and provides credible first-hand information on working conditions. However, research conducted by the Mekong Club and United Nations University has found that the frequency and quality of workers' interviews during audits – and the related possibility of forced labour identification – can be hindered by several factors.

These include:

TRUST

Interpreters can be bribed or unable to accurately report the workers' comments. Workers themselves

may be lying to maintain privacy or because they have been coached by the employer. Auditors cannot sample a larger number of workers because of time constraints and do not trust a few workers' testimonials. This prevents them from investigating further.

“ I would never initiate an investigation solely based on one worker's complaint. What if he was just having a bad day and wanted to criticize his employer? I would jeopardize a good business relationship because of one liar.”

– SENIOR AUDITOR – MEKONG CLUB
STAKEHOLDER FOCUS GROUP

LANGUAGE

When the audit is conducted in a country where no local auditors are available, an external auditor who does not speak the local language might find it difficult, if not impossible, to communicate with the workers. This is particularly apparent when a factory employs a high number of migrant workers, which is common in certain locations and during peak production season.

“ My audit team finds it very hard to speak with migrant workers due to language barriers. They have tried by using Google translate.”

– AUDIT TEAM CHIEF, MULTINATIONAL COMPANY,
MEKONG CLUB STAKEHOLDER FOCUS GROUP

TIME

Auditors often do not have enough time to interview more than 2-3 workers during a full-day audit, especially if the factory is large. In a factory with hundreds of workers, auditors will only have time to question a small percentage. Their results will likely paint a superficial picture of the reality on the ground.

“ We have so many areas to cover in an hour audit. We usually have time for a max of 3 interviews, if any at all.”

– AUDITOR DURING FACTORY VISIT OBSERVED BY
MEKONG CLUB

FEAR

Intimidation, threats and fear of reprisal for speaking out mean that a worker might be unable to voice complaints and relay honest information about working conditions. This can be a problem in smaller factories where the content of interviews can be more easily traced back to individuals. A manager observing or overhearing the conversation may also intimidate workers, preventing verifiable data collection.

“The auditor interviewed workers. None of them left their work station for the interview. The supervisors, who were accompanying the auditor during the factory tour, stayed nearby during the interview.”

– MEKONG CLUB REPRESENTATIVE'S REPORT -
FACTORY AUDIT OBSERVATION

loosely followed. Often, deciding how to 'weigh' a certain response is up to the auditor's interpretation of the situation. Also, different companies use different audit standards (sometimes a recognised global standard, sometimes their own), each of them including different guidelines and questionnaires for workers' interviews. This makes data gathered across companies hard to standardise and analyse.

“We have guidelines when it comes to questions to ask but follow them loosely. The questions I ask are based on two different questionnaires the company distributed.”

– AUDITOR DURING A FACTORY AUDIT OBSERVED
BY MEKONG CLUB

In order to overcome the challenges above, we have developed Apprise Audit. Designed as an app for smartphones and tablets, Apprise Audit enhances workers' ability to have their voices heard during social audits, and for the auditor to quickly get a consistent snapshot of the workplace. This increases identification of vulnerability and labour exploitation.

VULNERABILITY INDICATORS

Workers' interviews are usually structured around guidelines on what questions to ask, but these are

The table below outlines how Apprise Audit tackles each aforementioned challenge:

Trust	<ul style="list-style-type: none">• The app's multilingual capability eliminates the need for the interpreter during initial screening.• It is more difficult for workers to be 'coached' and for managers to track answers back to workers, as workers are able to answer anonymously.
Language	<ul style="list-style-type: none">• Questionnaires are translated into the most common languages per sector of work, with support provided for dialects as well as minority languages within countries.• The use of audio recordings of questions overcomes issues of low literacy/illiteracy.
Time	<ul style="list-style-type: none">• Once the app is launched, the auditor does not need to supervise the interview process – it is completely automated and able to interview and collect information from multiple workers. The auditor can take care of other aspects of the audit in parallel to workers giving interviews through the app.
Fear	<ul style="list-style-type: none">• The interviews are anonymous and no sensitive data is recorded.• We strongly encourage the use of headphones so questions cannot be overheard.• As questions are played through audio files, and no visual cues are included on the screen, an observer cannot decipher the responses made by a worker.
Indicators	<ul style="list-style-type: none">• Questionnaires are aligned to the ILO indicators of forced labour, supporting consistent analysis across factories and sectors of work.• The questionnaires have been refined through multiple focus groups including auditors, anti-slavery experts and brand representatives.• Data can be exported from Apprise Audit, and then used by organisations to complement their existing standards and audit data collection platforms.

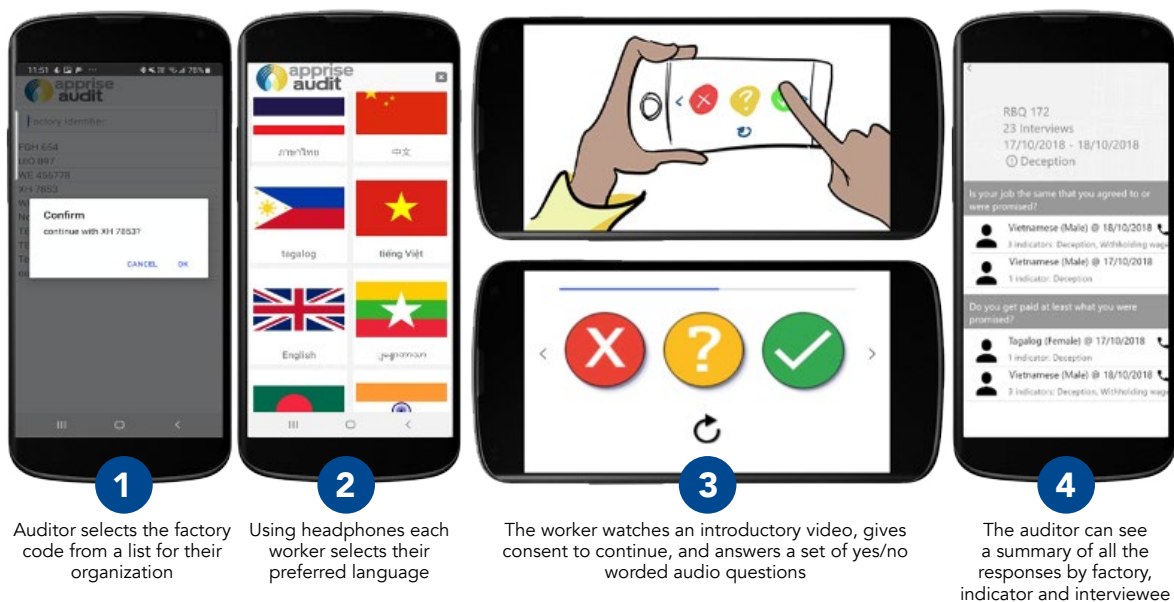
The Apprise Audit Platform

The Apprise Audit platform consists of two components:

- 1) A smartphone app for the collection of data during worker interviews, with the ability to immediately view a summary of results.
- 2) A content management system (best accessed on a laptop/desktop) to allow organisations to manage user profiles and perform more in-depth analysis of interview responses.

Workflow

- 1) The organisation administrator sets up their organisation user profiles on the Apprise Audit platform. There are three user roles:
 - a) Organisational Admin
 - b) Group Admin
 - c) Auditor
- 2) The auditor downloads the Apprise Audit app onto their phone. On first login to the app, question translations and factory lists are downloaded onto the auditor's phone and stored for subsequent use. After the initial login and download, internet connectivity is not required to login to Apprise Audit. At this point, the auditor is now ready to conduct an interview.
- 3) The interview process is outlined in the diagram below.



- 4) All interview results since the last phone synchronisation are available immediately on the social auditors' device. The responder is able to see basic information about the interview, such as the language selected, as well as information on which ILO indicators of forced labour were flagged during the interview. When next connected to the internet, all results can be uploaded to the content management system. Here, the results can be securely viewed by the responder, group admin, and organisation admin (depending on the sharing permissions set for the organisation).

- 5) Results are stored securely and are automatically analysed and displayed through two tabs on the upper navigation bar: Analyse and Interviews . The Analyse function of the platform allows a viewer to see macro trends of issues arising across factories based on the frequency of indicators observed in interviews. One can therefore filter by such variables as:

- Question list
- Organisation group
- Language of the interview
- Factory identifier
- Gender of interviewee
- ILO indicators flagged

- 6) Results can also allow for factory-specific analysis of interview results, and allows administrators to toggle through individual factory responses as shown below.

REMOTE AUDITING CAPABILITIES

Gathering worker information is critical. As Covid-19 exacerbates existing vulnerabilities, particularly within migrant worker communities, ensuring that workers have a voice in their own labour conditions is imperative. The more workers we can reach, and the more data we can collect, the more we can also understand the longer-term impacts on worker vulnerabilities to modern slavery during this period and beyond.



We have added functionality to the platform in order to reach workers that cannot be reached during Covid-19, or due to other restrictions that require remote data collection. This allows for questions to be delivered using the Apprise platform, in the workers' own language, via a QR code. Workers can be sent the QR code, or it can be displayed in an accessible location, such as the toilets and/or canteen in the factory, and they can complete the questionnaire in their own time.

In response to the changing patterns of exploitation from the field, we have developed a bespoke question list to identify Covid-19 specific lockdown/ health & safety issues.

Insights from Industry: Using Apprise Audit

There are a range of manufacturing and retail companies utilising the Apprise Audit system as part of their audit processes, and this includes both in-person and remote audits (using the QR code functionality). We interviewed these companies in order to better understand how they utilise this technology. Due to the sensitive nature of this information, respondents remain anonymous.

What first makes companies interested in Apprise Audit?

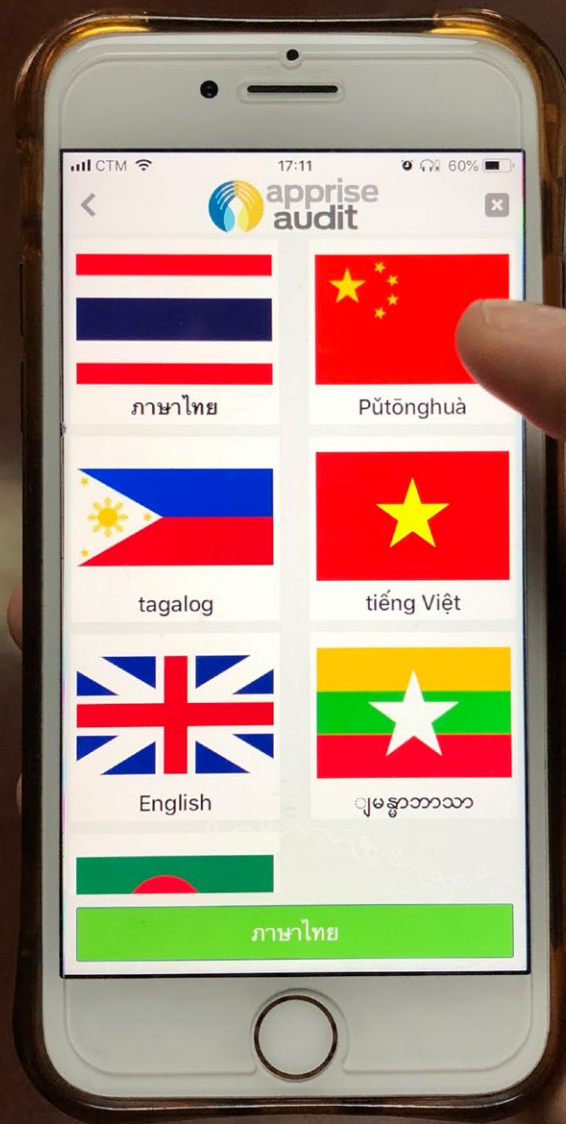
Companies are usually interested in Apprise Audit as they wish to combat the challenges faced in uncovering forced labour issues during direct worker outreach, which usually takes place during social audit interviews. This may be language barriers, lack of training, lack of consistent data collection, concerns over privacy, or a lack of existing means to collect worker feedback directly during the process. Apprise Audit offers a solution to these challenges.

“ We were first interested in the Apprise Audit platform as it is easy to use and is a simple way to enhance social audit procedures. We were interested to see how the tool may unearth potential grey areas related to worker conditions that we were not able to see prior to using such technology.”

“ Apprise audit stood out as a mobile solution with multiple languages available, we needed a tool that captures worker feedback and offers a real-time summary back to the auditor.”

How do companies typically use Apprise Audit?

Different organisations utilise the platform in different ways. Most find it useful to integrate Apprise Audit as part of their standard auditing processes to identify potential red flags during worker interviews. Some organisations did not usually interview workers as part of the process so using Apprise Audit created a new worker voice collection element that otherwise did not exist. Others incorporated Apprise Audit



as part of existing interview processes, while others use Apprise Audit as a standard practice for all audits which may then lead to follow-up interviews if indicators are raised.

Many companies using Apprise Audit have adopted it as a standard part of their social audits, and use it as part of both in-person and remote audits.

“ We have incorporated the use of Apprise Audit with our Priority 1 [High Risk] suppliers in Risky countries. Priority 1 [High Risk] suppliers are assessed on a regular basis & they equate to the near maximum amount of our turnover.”

“ We have incorporated Apprise Audit into our regular spot-check processes as part of a global social audit programme.”

Do companies usually use the QR code function and/or the smartphone app to deliver the interviews?

During Covid-19 and beyond, the majority of users are making use of both methods of delivery. The smartphone app is preferable when a physical audit is possible, due to its offline features and interface. It also does not require the workers to have their own devices as the interview is conducted on the auditor's device. The QR code function is primarily used for remote data collection. Some organisations use both methods in conjunction, bringing both the app and QR code to the factory during an audit. This allows for workers to access the interview without handling a device other than their own phone, which is seen as preferable in some locations where transmission of Covid-19 through shared devices is a concern.

“ We use both the QR code functionality and the smartphone app to conduct our interviews. We have conducted thousands of interviews using Apprise Audit and are able to engage with many more workers than before. We currently use the QR code functionality on a regular basis and consider it to be a very useful feature to collect data remotely as well as during in-person factory visits. We plan to use the QR code functionality extensively moving forward as it allows for data to be conducted even when there are restrictions in place due to Covid-19.”

“ We use both the QR code function and smartphone app. When our auditor conducts an onsite audit, the auditor can follow the normal interview procedures and can choose whether to deliver the interview using the app or QR code depending on their preference. The auditor will explain how to use the app/QR code before starting the interview with the worker.”

Do companies inform factory management/suppliers that they will be using Apprise Audit? How does this communication usually happen if so?

This process varies on a company-by-company basis and is determined by internal procedures, it may also be influenced by the relationship between the factory and the company. Typically, we have seen successful communication whereby the factory management is communicated with in a transparent fashion and is considered a part of the process. It is also recommended to be clear with the factory that Apprise Audit is a risk indication tool and risk raised using the tool alone would be coupled with further investigation to verify and remediate where necessary, as per the company standard policy.

“ This communication happens on the day of the assessment during the opening meeting, if it's in person. It is conveyed through our business unit (a person is already assigned & responsible

for that factory) if we are using the QR code functionality.”

“ Yes. When an auditor conducts either an onsite or virtual audit, the auditor will inform the factory management about Apprise Audit. This is especially for virtual audits as we will need the factory management's understanding and cooperation to arrange the use of Apprise Audit with the workers.”

“ For our virtual or remote audits, the auditor will set up a meeting with factory management to explain how to use the QR code, and the purpose of the exercise; factory management will then share the QR code with workers to fill in the information and the auditor can monitor the information coming in.”

How do companies incorporate the Apprise survey results into their decision-making processes?

In most cases, companies will use Apprise Audit results to indicate whether a follow-up interview and/or document check is required. Apprise Audit is used to indicate risk and streamline investigation activities. In some cases, Apprise Audit results also help to inform the risk score/profile of the supplier.

“ We use the Apprise Audit results to inform our risk profiling of the supplier. If indicators are found during the audit then we may increase the risk level of that supplier and put in place corrective measures to address the issues that are uncovered. We will then also monitor that supplier for the issues that had been uncovered using Apprise Audit, to ensure that the issues do not arise again.”

“ All the indications from Apprise Audit results are followed up and verified through document review/in-depth worker and management interview/investigation if necessary.”

Are companies finding value in looking at the survey data on an aggregate level over time?

All of the users of Apprise Audit actively use the backend aggregation functionalities. This is especially useful for companies that are collecting thousands of interviews across multiple countries.

“Yes, we find Apprise Audit useful to understand trends in the data that we are collecting and to build a bigger picture of where risk lies within our supplier base.”

Do companies share survey results with factory management? How does this usually happen?

Companies typically share the results of the interviews when they identify a potential issue and would like to work with the factory to address this. As Apprise Audit is designed to indicate risk, it is seen by the users as a means to identify potential underlying issues early on, and put in place corrective action plans and mitigating measures to ensure that the risks do not get worse. No company we interviewed gives automatic access to the assessment results to the factory management but rather chooses to share results on a need-to-know basis.

“Yes, if we uncover issues through the Apprise Audit platform, then we will inform the factory management of the results and work together with them to develop a corrective action plan.”

“We use the assessment results to then inform additional interviews and investigations as needed. Apprise Audit allows us to go deeper into potential issues by first ensuring that we identify possible red flags that need further investigation.”

“Normally we don't share survey results directly with factory

management. If the indicator is cross checked and confirmed as a finding/violation, it will be communicated with factory management as part of the audit results.”

“We use the results from Apprise Audit in two main ways:

- Use the immediate survey result as a red flag and pre-screening to dig more information during the audit.
- Use the immediate survey result as one parameter to select a particular factory for our Spot Check program.”

Approximately how many surveys (or % of workforce) does any one user undertake at each visit?¹

This is very much a personal choice for each user and can vary substantially depending on the risk profile of the factory, the company's policy, and whether the app or QR code is being used to collect the data.

“The number of workers we survey in each audit depends on the risk profile of the factory & the intermediate results from the survey.”

“If we identify a handful of workers through the platform that indicate that there may be risk, then we will interview more workers of that demographic to see how widespread the risk is. Therefore, the number of workers that we interview can vary from a few to the majority of the factory.”

“We follow the rules of worker interview in normal audit, around 15 to 20 workers. For virtual/remote audits, the more the better.”

¹ The investigation would be conducted in case 'high risks' are identified. The 'ILO indicators of forced labor are a commonly used primary reference point for companies in defining "high risk" issues: https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm



Do you find that using Apprise Audit increases or decreases the man-hours needed per audit?

This varies depending on the usual procedure of the user before Apprise Audit was introduced to the process. Some companies never interviewed workers before so Apprise Audit adds time on to the process, while others report that Apprise Audit is much more efficient at collecting data than a traditional interview. Therefore, there is no fixed answer to this question.

“In general, using Apprise Audit saves time, especially when we use the QR code in our remote audits, we can cover more workers. But in some cases, the auditor needs to spend more time explaining to the workers the purpose of the survey.”

“We find that we need to allocate an extra 1.5-2 hours for an assessment to ensure that we can interview as many workers as we would like to.”

Are companies incorporating responses from the survey into the final audit report as a new official “evidence” point?

The majority of companies using the platform are either actively doing this or are planning to begin this

in the near future. Usually, indicators are included as an evidence point in the final report if they are raised during Apprise Audit, and these are usually coupled with further document reviews or interviews.

“We currently remediate issues identified by the Apprise Audit separately to the official audit report, however we plan to change this as we become more familiar with the platform.”

“Moving forward ‘non-conformities’ identified by Apprise Audit will be incorporated into the official audit report.”

“Responses from the survey are verified and cross checked through document review/observation/management interviews. If findings are confirmed during this process then the responses will be incorporated in the audit report.”

How do companies reconcile when the survey responses contradict what the auditor finds from document review and in-person interviews?

Apprise Audit is designed to indicate risk and facilitate more targeted investigations. For this reason, the platform is primarily used as a first point of data collection to then inform further investigation if indicators are raised.

“ Sometimes we need to go deeper into the findings in order to identify whether there really is an issue, or whether there has been a misunderstanding of the question. We do this by conducting further interviews with the workers on the issues that have been flagged using Apprise Audit.”

“ We find that Apprise Audit is excellent to help uncover risk. Often this risk is addressed simply by digging a little deeper, but it helps us to initiate those conversations that otherwise we may not have had.”

“ We verify findings by conducting document reviews and in-person interviews in addition to the Apprise Audit interview, if needed.”

What makes Apprise Audit different from other worker voice platforms or technologies?

Apprise Audit is different from many other worker voice mechanisms as it is driven by the auditor (or frontline responder). It does not require workers to download anything to their own devices (even when using the QR code to answer an interview). This is proven to drive greater uptake, as Apprise Audit can be incorporated into existing auditing procedures and does not rely on workers to self-identify or use their own data and devices to seek help.

“ Apprise Audit is different to any other technology that can be used during social audits as it is simple and effective. It is very easy to roll-out to multiple countries as the interface is easy to understand and the results and data are standardised. We have found Apprise Audit to be effective in gathering worker experiences and overall, it is a very easy tool to incorporate into the auditing process. We plan to continue incorporating Apprise Audit into our standard practices for this reason.”

“ Questions asked within Apprise Audit are very much focused on Forced Labour related issues and allows us to deep-dive into this topic. Apprise Audit captures worker feedback and offers a real-time summary back to the auditor quickly and easily, it is different from any other platform of this type.”

Case Study 1

Apprise Audit omits critical language barriers for collecting migrant workers' feedback, while giving us the ability to reach workers who have never before been interviewed. After Covid-19 hit in 2020, the remote feature allows us to continue to collect valuable worker voice driven data in a time of particular need. Apprise Audit helps to uncover indicators of potential modern slavery issues and we are now testing ways to scale it in our global supply chains to improve due diligence and risk assessment.

Case Study 2

Indicators from Apprise Audit showed that some workers in the factory didn't sign an official labour contract. The auditor then conducted in-depth investigations on this issue and found that the factory had hired temporary workers and didn't sign official labour contracts with these workers. It was also found that they were not providing legal benefits. As a result of this process the factory's compliance rating was downgraded and the factory was put through a remediation program to make improvements to the working conditions and contract process.

Case Study 3

Indicators from Apprise Audit showed that there were issues with the working conditions in the factory. For example, some workers reported no drinking water available to them while working. The auditor interviewed factory management and confirmed the issue with working conditions was correct. The factory management took action to repair the water pipe and workers were able to access clean drinking water, their working conditions were improved by using Apprise Audit.

Case Study 4

A female worker had to do a pregnancy test as part of the pre-employment health check-up required by the factory. The auditor then brought this issue

up with the factory management who indicated not having any specific requirements for health check-ups. The auditor worked with the factory management to specify these health check-up requirements to ensure that female workers would not be forced to take pregnancy tests in the future.

Case Study 5

Apprise Audit flagged that several workers had either experienced or witnessed harassment. These issues were immediately raised with factory management and a refresher training was put in place in order to reiterate harassment policies and ensure that all workers and management understood and respected the rules, especially with regards to harassment of women.

Data collected during Covid-19

For confidentiality purposes, we are unable to publish the full Apprise Audit data set. The data collected using the platform belongs to the company that collects that data.

To understand the typical impact that Apprise Audit can have, we have analysed an anonymous sample of 10,929 interviews conducted. This sample includes data from October 2019 to July 2021. The vast majority of these data points were collected when the Covid-19 pandemic was already underway. This reflects the sharp increase in usage that we saw in Apprise Audit as a result of the Covid-19 pandemic, as many users made use of the technology on a larger scale.

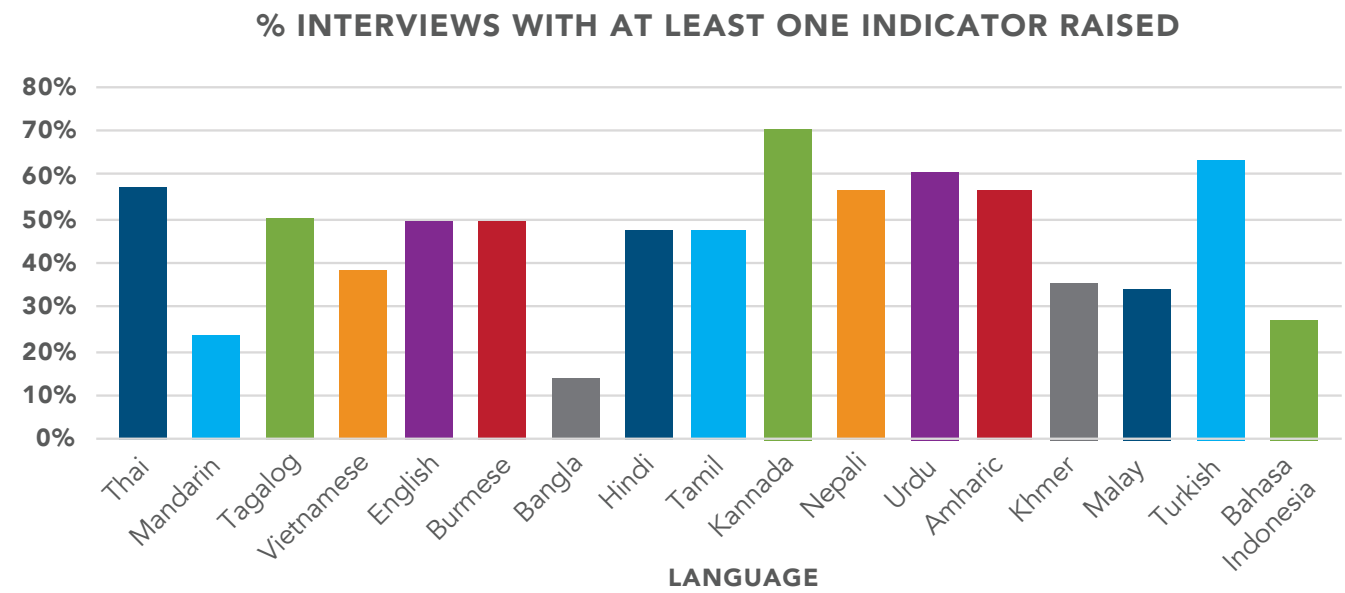
We had the following insights into this data set, which includes worker interviews across 17 languages. Apprise Audit does not collect location information, hence why language spoken is used to sort the data. **During the time of this data collection, Apprise was being implemented in the following countries:**

- China
- Indonesia
- Malaysia
- Vietnam
- Thailand
- Turkey
- Cambodia
- Ethiopia
- Sri Lanka
- Nepal
- India
- Philippines
- Jordan

29% of interviews conducted raised at least one indicator of forced labour risk.

The average number of indicators raised per interview was 2.5. Therefore, if a worker is potentially at risk, they are typically displaying more than one ILO indicator of forced labour at once.

The following chart demonstrates the percentage of interviews for each language in which at least one indicator was raised.



The following chart demonstrates the most/least common indicators raised across all interviews in the sampled data. All of the workers interviewed in this sample data set are factory workers, working in the clothing and sporting goods manufacturing sectors. These are typically workers who are within 'Tier 1' of the manufacturing process, making the finished good that is ready for sale.

BONDED LABOUR

This refers to scenarios where workers may have taken on debt to secure the role, for example through the payment of recruitment fees. This can become problematic if the debt is to the employer or agent, and is used as a means to control. We use questions to identify whether such a debt may exist and whether there are red flags indicating that the debt is excessive and/or linked to their employment.

When Apprise Audit flags indicators in this category, typical follow-up action includes understanding the nature of the debt involved as well as any potential violations of company policy related to recruitment fees. This usually would involve interviewing workers to better understand the nature of any debt as well as making investigations into the recruitment process to identify if any remediative activity, such as the repayment of recruitment fees, needs to occur.

In the data set, we found 5% of cases raised possible bonded labour risk.

CHILD LABOUR

This refers to situations where workers are below legal working age. We identify indicators for child labour by not only asking workers about their own age, but also asking whether they have seen child workers in the factory before.

When responding to this data, companies must take into account their own policies, but also local laws and regulations which may vary. Follow-up activity in this case, therefore, would likely be to verify workers' ages to identify whether there indeed has been a violation of policy or local laws.

In the data set, we found 8% of cases raised possible child labour risk.

CONTRACT ISSUES

This group of indicators looks to identify whether workers have experienced issues with their employment contracts. Questions centre around

whether workers have a contract, in their own language, that they understand.

Follow-up to indicators raised in this category include carrying out checks of worker employment contracts, and where necessary working to rectify any discrepancies or issues with the process.

In the data set, we found 5% of cases raised possible contract issues.

DECEPTION

This group of indicators seeks to understand whether workers feel they were misled as to the nature of their work and pay. Questions focus on whether workers feel they signed up to different working terms or conditions, and the reality does not line up with what they were promised. This could involve issues such as unexpectedly low pay or unexpectedly long hours.

Follow-up to indicators in this category would usually require more information to be gathered, in order to determine how deception is occurring, and at what stage of the worker's journey. This would likely include further interviews with workers.

In the data set, we found 4% of cases raised possible deception risk.

DEPRIVATION OF LIBERTY

This group of indicators examine whether workers feel they are free to move, outside of working hours, for example by being able to leave their workplace or dormitory when they wish to.

Indicators raised in this group may lead to further investigation as to whether the limitations of freedom of movement have a reasonable explanation behind them (such as legally mandated Covid-19 restrictions) or whether they could be considered a breach of workers' rights.

In the data set, we found 14% of cases raised possible deprivation of liberty risk.

Please note, as this data set primarily consists of data gathered during the Covid-19 pandemic, it is possible that this high percentage is due to government mandated Covid-19 restrictions on workers. This demonstrates the need to conduct further investigation on any data that is collected via technology, as outside factors may skew results.

GRIEVANCE

This group of indicators centres around whether workers feel they are able to speak up, confidentially and safely, if they have any concerns about their working conditions. We also examine whether workers feel their concerns would be managed effectively, without fear of retribution.

If indicators are raised in this category, likely follow-up would be to determine whether there is a grievance mechanism in place in the facility, considering whether the mechanism needs to be reviewed, or whether new processes need to be established.

In the data set, we found 11% of cases raised possible grievance risk.

HEALTH & SAFETY

This set of indicators is not directly related to modern slavery risk, but can indicate a wider issue. This includes understanding whether workers have access to necessary facilities, as well as whether key safety activities such as fire safety checks are conducted.

Indicators raised in this category would likely lead to further investigation into the health & safety matter at hand, as well as indicating a risk that there may be wider issues with worker wellbeing.

In the data set, we found 5% of cases raised possible health & safety risk.

LIVING/WORKING CONDITIONS

As above, this set of indicators does not necessarily directly link to modern slavery but could indicate a wider issue with worker wellbeing. Indicators may include access to key cleanliness and living facilities, as well as the general condition of the workplace.

In the data set, we found 7% of cases raised possible living and working conditions risk.

OVERTIME

Indicators in this category are used to identify whether there is a risk that workers are being forced to work hours beyond their agreed limits, and whether they are being paid properly for such activity.

Overtime is a complex issue as the legality and risk of modern slavery can vary – some overtime is entirely voluntary whereas some may not be. Therefore, risk identified in this category often must be followed up with further clarifications to understand how the facility manages overtime.

In the data set, we found 2% of cases raised possible overtime risk.

PAYMENT

This group of indicators focuses on worker payments and how they are received. This may include whether payments are made directly to worker bank accounts or via other means.

As this issue can be complex, and norms can vary by country, further investigation would be required to ensure that payment processes are not leaving workers vulnerable to exploitation.

In the data set, we found 7% of cases raised possible payment risk.

RETENTION OF ID

This indicator group seeks to ensure that workers have access to their ID documentation, when needed, as this may otherwise be used as a means to control their movements.

Some facilities may keep workers' ID documents on their behalf for safekeeping, so distinction must be made between this and restricted access. This may require further investigation if risk is identified.

In the data set, we found 4% of cases raised possible ID retention risk.

THREATS/VIOLENCE

This group of indicators seeks to understand whether workers have experienced or witnessed violence or threats made against them or others.

Indicators raised here may require a highly sensitive response due to the potential risk posed to the workers involved.

In the data set, we found 6% of cases raised possible threats or violence risk.

WITHHOLDING WAGES

This set of indicators seeks to understand whether workers are paid on time and in full.

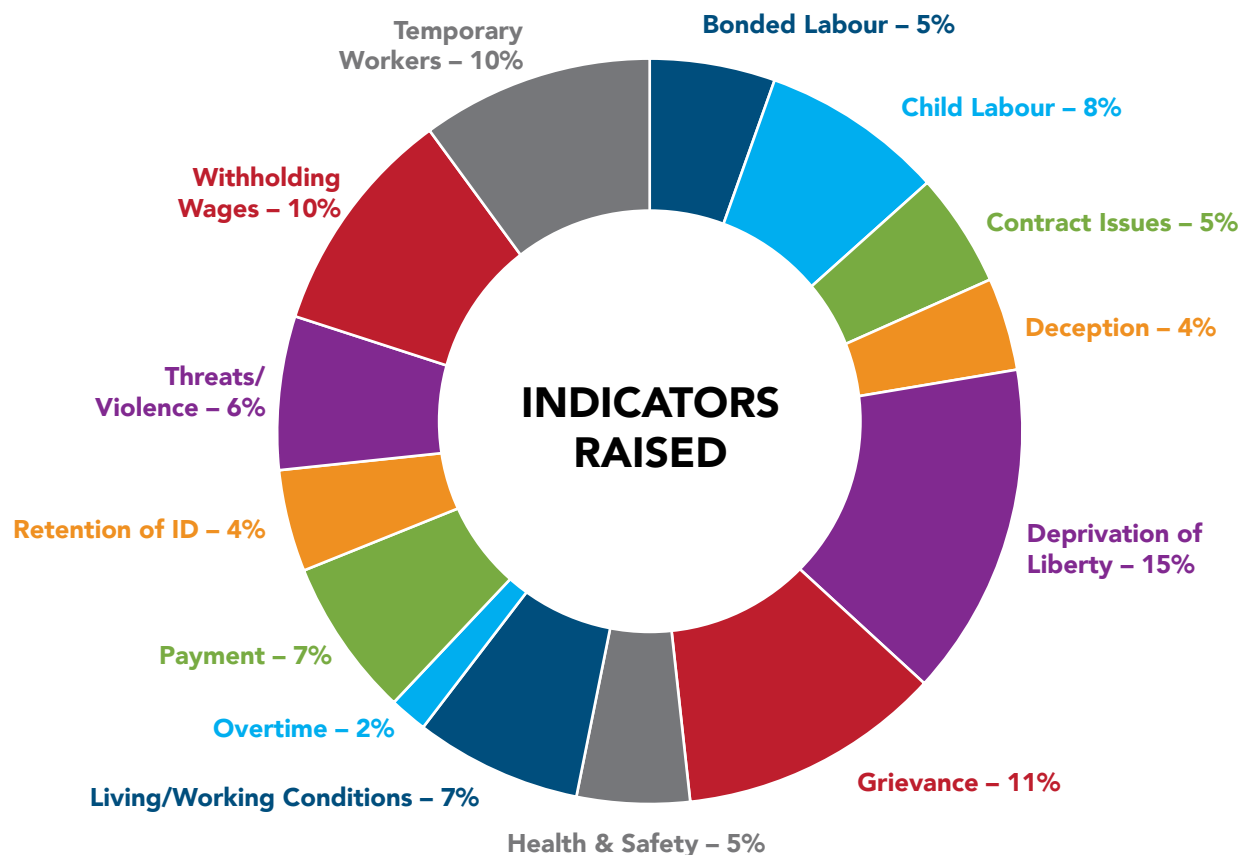
While there may be some explanation for delayed payments, further investigation is typically required to understand the nature of any delays, and to rectify any issues.

In the data set, we found 10% of cases raised possible withholding wages risk.

TEMPORARY WORKERS

This set of indicators is used as a proxy for risk, as having temporary workers alone does not indicate modern slavery occurs. If a company does not expect there to be temporary workers, or wishes to ensure that these workers are treated fairly, then these indicators will be used to identify the presence of these workers.

In the data set, we found 10% of cases raised possible temporary worker risk.



In order to respond to specific risks to workers as a result of Covid-19, the following Covid-19 related questions were added to the Apprise Audit platform in 2020. The following data is taken from factory workers in the garment and sporting goods manufacturing industries, in factories, typically at Tier 1 level (making finished products). This anonymous question set includes data from 717 worker interviews. The majority of respondents chose the Bangla language, which reflects the fact that Apprise Audit is implemented both within Bangladesh but also in many locations where Bangladeshi migrant workers are found in the manufacturing industry.

The following languages were detected in the data set:

- Bangla (607)
- Burmese (49)
- Hindi (2)
- Khmer (1)
- Nepalese (15)
- Mandarin (6)
- English (32)
- Turkish (1)
- Urdu (4)

Apprise Audit does not collect location information, hence why language spoken is used to sort the data. During the time of this data collection, Apprise was being implemented in the following countries:

- China
- Indonesia
- Malaysia
- Vietnam
- Thailand
- Turkey
- Cambodia
- Ethiopia
- Sri Lanka
- Nepal
- India
- Philippines
- Jordan

Have you received health & safety training on Covid-19 from your employer?

75% of workers surveyed who answered this question indicated that they had not received specific training related to Covid-19 health & safety. In order to address this risk, we have developed e-learning videos that can be shared with suppliers and workers, to help them understand Covid-19 risk factors. The English versions of these videos can be found [here](#).

Are there restrictions on you leaving the factory/dormitory due to Covid-19?

92% of workers responded that there was some form of restriction on their movement in place. Outside of Covid-19, this would be considered a serious modern slavery risk, as restriction of freedom of movement is an ILO indicator of forced labour. However, Covid-19 has created unprecedented circumstances in which governments have imposed country- and city-wide lockdowns and restrictions on the movement of all citizens. Therefore, we found this question useful as a starting point to indicate possible risk, but to better understand whether this restriction was a result of Covid-19 mandated measures, then local understanding was crucial.

Typical follow-up questions to identify this risk include understanding whether the restrictions in place match local regulations, or whether they were being imposed by choice by the company

involved. It is also helpful to understand whether the restrictions were at factory or dormitory level, and who was involved in creating and implementing such restrictions.

Do you feel it is possible to safely social distance yourself from others while in your workplace?

84% of respondents felt that they could not safely socially distance whilst at work. This may reflect the nature of factory work in many industries; however, it is a key area of concern as this indicates that workers felt pressured to put their own personal health and safety at risk in the workplace. Understanding how factories can be better configured to protect against future health crises should be a priority area, learning from this feedback.

Has your pay rate reduced due to Covid-19?

85% of respondents felt that their pay rate had reduced due to Covid-19. This is likely due to factory closures, supplier downsizing, and shrinking economies. Companies should seek to understand whether this reduction in pay rate is in line with expectations, and ensure that it does not indicate that workers are being paid below legal minimum wages. As production begins to return to pre-pandemic levels, monitoring to ensure that pay rates reflect this could be a recommended course of action in light of this statistic.

Have your working hours been reduced due to Covid-19?

87% of respondents' working hours were reduced due to Covid-19. As above, this reflects trends caused by the pandemic in terms of reduced production rates. This reduction in pay and hours may lead to vulnerabilities in the workforce, as workers take on debts in order to continue to access basic amenities. Companies and suppliers should consider whether any supportive measures can be put in place to ensure that workers are able to survive given the reduced income that they are receiving. As working hours begin to rebound, it is crucial that companies monitor to ensure that workers are being paid legal hourly rates.

INSIGHTS FROM INDUSTRY: THE FUTURE OF SOCIAL AUDITING

Finally, we consider the company interviews that we conducted, as well as learnings taken from implementing Apprise Audit to collect data during Covid-19.

50% of the 12 companies that we interviewed stated that Covid-19 has not changed their approach to social auditing in the long term.

“ I personally believe social audits should not be carried out remotely. Face-to-face audits and contact to the people you are auditing is an important part which cannot be transmitted remotely.”

The other 50% stated that Covid-19 had changed their approach to social auditing forever. While all companies state that solely relying on remote processes is not their plan for the future, many state that they have taken lessons from recent years that will inform their auditing strategies going forward. This includes incorporating an element of remote data collection into their standard auditing processes, using technology more regularly, and exploring how remote auditing may help overcome challenges outside of those posed by Covid-19.

“ Based on our experience, an onsite assessment is still the best way to go but this approach will be complemented by offsite assessments, as it increases the capacity and reduces costs.”

“ Remote audits will likely be more readily considered as an option, particularly where on-site audits are not feasible due to geographic differences.”

“ Onsite/In-person visits will remain as the key way to do audits, although virtual audits have become a popular back-up option accepted by more companies. Another observation

is people are now focusing more on collecting worker feedback through surveys or other technologies.”

“ Remote auditing is definitely something which had been used more and many organisations like us are still looking at ways to enhance remote auditing as a tool which can be utilized even after the pandemic.”

How can technology play a role going forward?

Those companies that continue to engage with remote auditing all identify that technology is crucial in facilitating this. We asked them about how they would like to see technology developing in this space.

Some identified a need to be able to better interact with workers remotely.

“ Using remote auditing - we could not do interviews with workers to get a feel of the conditions on the ground. As such, if there could be a tool to be used to easily communicate with the workers remotely, this will be helpful.”

“ [Technology tools] may be helpful to gather workers feedback and concerns if auditors are not able to visit the factories.”

Others suggested that remote ways to distribute training and awareness materials would be helpful.

“ During remote audits, we have not been able to include training/awareness for suppliers... [if technology could be used to support this, that would be helpful].”

Some companies are working on ways to automate procurement processes, to continue their work in engaging with technology throughout their sustainability functions.

“ *We are in the process of developing a tool that automates the process of our requests for proposals (RFP) for purchasing/contracting. The automation allows for standardized RFP questions including questions about Human Trafficking practices in the manufacturing process.”*

One of the most commonly suggested areas that technology can assist with, is developing more comprehensive and standardised data collection. This includes areas such as grievance reporting and remediation, where technology can be utilised to develop better management and monitoring systems, to strengthen the overall social audit approach.

“ *[We continue to see challenges with] reliability and integrity of third-party audits, stronger focus on capacity building and management systems rather than individual findings [is needed], more centralised and effective multi-stakeholder grievance mechanisms with centralised management able to provide remediation (especially useful where many customers are using the same factory) [is also needed].”*

“ *“[We see technology playing a role in] stronger, more comprehensive and more centralised data maintenance.”*

understand their conditions. Companies were required to grapple with technology in order to meet these challenges, to varying degrees of success. We adapted the Apprise Audit platform to support users to gather worker data during this time, and feedback suggests that this approach was valuable to companies.

In the long term, it remains to be seen whether Covid-19 has truly changed the modern slavery and social audit landscape forever. The companies that we surveyed were split in their opinions, with many firmly believing that there is no replacement for in-person visits, although perhaps accepting that technology may play a more central role going forward. The data that we have collected using Apprise Audit certainly suggests that modern slavery risk prevails across industries, and that this risk may have been exacerbated by Covid-19. However, the fact that the private sector continues to proactively seek out this risk, even during times when they could have turned a blind eye, and creatively adapt to challenges, is a positive indication that the global fight against modern slavery continues to grow stronger.

To learn more about our work with the private sector to continue to build sustainable modern slavery strategies, contact us at info@themekongclub.org.

CONCLUSION

Overall, it appears that Covid-19 has had a profound impact on companies' abilities to interact with workers across many industry types. The challenges posed by travel restrictions, lockdowns, and unprecedented restrictions were felt to a significant extent. This challenge combined with the fact that the vast majority of workers surveyed using Apprise displayed risk factors as a result of Covid-19, from restriction of freedoms to decreasing pay. During a time when risk appears to be increasing, companies were less empowered to reach these workers and



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