

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: Mothercare

1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? How is this policy communicated to vendors in Turkey?

Yes, [see attached](#). So far, this has been emailed to suppliers and each one has confirmed their understanding. A workshop to communicate this in more detail and to train suppliers on due diligence and management systems relating to the employment of Syrian refugees was planned for 21 July but had to be cancelled due to the security situation in Turkey.

2. How many first tier Turkish vendors does your company have?

32

3. How many have been audited since in the last year? What percentage of audits have been unannounced?

100% have been audited and 64% were semi-announced whereby the factories are given a 'window' of dates but not a specific date.

4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited in the last year and what percentage of these audits have been unannounced?

We currently audit factories which carry out primary production, usually from cut to pack.

This sometimes involves sub-contractors but is mainly focussed on tier 1.

5. Do the audit & monitoring teams have Arabic-speakers who have received special training tailored to the situation of Syrian refugees, and do they speak with the workers confidentially?

The audit expert we are working with in Turkey has experience working with Syrian refugees in Turkey and Jordan and has worked on the specific topic of work permits with one of the bodies which negotiated this with the Turkish government. All worker interviews are confidential and we are working towards having Arabic-speaking support for the unannounced assessments we are planning.

6. How does your company address the possibility of undeclared subcontracting in its supply chain?

This is treated as zero-tolerance as outlined in our Sub-contracting and Sub-supplier policy.

7. Has your company identified supplier factories employing Syrian refugees in the last year? If the answer is yes please state how many factories, if possible

No.

8. Has your company identified supplier factories employing Syrian child refugees in the last year? If the answer is yes please state how many factories, if possible

No.

9. When Syrian refugees are identified at a supply factory, what process does your company expect the supplier to follow? In particular please state whether they remain in employment.

Suppliers must take a zero-tolerance approach to discrimination against Syrian refugees. All Syrian refugees must be given equal treatment to Turkish workers as regulated for by the Turkish Labour Code and our [Code of Practice](#). They must meet the legal minimum working age, receive at least the gross national minimum wage and overtime premiums, be given a weekly rest day, an employment contract and health and safety training. All work must be conducted on a voluntary basis and not under threat of any penalty or sanctions.

Records to demonstrate this must be kept on-site including age proof, employment contract, working hours and payroll records.

If undocumented Syrian refugees have been employed, suppliers must commit to supporting the refugees to gain a work permit whilst they are employed on at least gross national minimum wage. Mothercare will work with the supplier to develop an action plan and requires proof of registration of the Syrian refugee within two weeks as well as regular updates against the action plan thereafter.

You can read about this in full in the attached [policy and remediation document](#).

10. Does your company have a remediation plan that addresses instances of discrimination/abuse against Syrian refugees in its supply chain? If yes please provide details of the plan, how it is communicated to refugees, and examples of outcomes if available.

Mothercare's Syrian Refugees in Turkish Factories Policy & Remediation Guidelines express Mothercare's zero-tolerance approach to discrimination against Syrian refugees and the fact that we expect this from our suppliers also. The remediation guidelines give step-by-step guidance to the auditor, supplier and the refugee/worker, as well as actions for Mothercare. We plan to have this translated into Turkish and Arabic so that this document can be left with suppliers and workers.

11. Does your company work with any local NGOs or trade unions to provide remediation services to refugees?

We are in dialogue with three NGOs and will develop this. Plans to meet with NGOs had to be cancelled recently due to the cancelled Turkey trip as mentioned above. Feedback from some NGOs is that they have a lot of demand for assistance from retailers and it may be beneficial if NGOs could work for a group of brands, perhaps under the Ethical Trading Initiative, in order to help the NGOs manage the demand.

12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?

This why we require suppliers to pay the gross national minimum wage.

13. Has your company undertaken any specific training with its first tier suppliers on this issue?

As above, this was planned for 21 July but had to be cancelled due to the security situation. We have communicated with suppliers via email – each supplier responded with confirmation of their understanding of our policy but we hope to be able to rearrange the training before the end of the year.

14. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier?

We are currently focussed on the specific situation for Syrian refugees at our tier 1 suppliers. However, our unannounced assessments are designed to identify and address concerns relating to the employment of Syrian refugees and have been developed in collaboration with a local expert. Part of the assessment is to understand further tiers of the supply chain so that we can risk assess these also.

15. Does your company engage with local civil society groups and trade unions on this issue, for instance, in negotiating a policy position & carrying out risk mapping?

Not answered.

16. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)?

Not answered.

17. Does your company work with trade unions or other partners to offer training and education programmes for refugees?

Not answered.

18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?

Not answered.