

Principle 1: Workers Are Treated with Dignity, Respect, and Fairness

Workers, irrespective of their nationality, gender, ethnicity, social and legal status, race, religion, or other protected status, are treated with dignity, respect, and fairness and are not subject to harassment, discrimination, abuse, or inhuman or degrading treatment.

Introduction

Applying the Building Responsibly principles in practice will be unique in every instance. This guidance note offers discussion around the potential issues and challenges faced and offers suggested good practice options for the implementation of each principle in the Key Components for Consideration section.

All workers, wherever they are employed, must be treated with dignity, respect, and fairness. There is a heightened risk of abuse where companies rely on migrant workers, low-skilled workers, and/or workers with low level of literacy. In these instances, companies must pay particular attention to their projects and operations to ensure all workers are treated with dignity, respect, and fairness.

Key Terms and Definitions

- » *Dignity*: The right of workers to be valued and treated in an ethical manner; to be protected from bullying, harassment, or any forms of disciplinary action deemed overly harsh or degrading; and to have their right to privacy respected.
- » *Fairness*: The promotion of equality in workplace policies, processes, and forums to ensure fairness in employment and provide opportunities in a non-discriminatory manner.
- » *Inhuman or Degrading Treatment*: Treating workers as less than human and thereby causing physical or mental suffering or feelings of fear and humiliation.
- » *Harassment*: Harassment can occur in the workplace, accommodation, or transportation. It involves a range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm and includes gender-based violence and harassment.
- » *Discrimination*: Employees are treated with respect and fairness and, regardless of their location, are free from all forms of discrimination, including discrimination based on nationality, gender, ethnicity, social and legal status, race, religion, or any other protected status.

Key Challenges

Unskilled and Low-skilled Work

Unskilled or low-skilled work can be a major component of construction projects in certain sectors and geographies. In some developing countries and in countries with labor shortages, many construction workers may come from impoverished communities, with limited access to education and professional training and low awareness of their rights. As a result, they often work in low-paid or temporary jobs, making them more vulnerable to exploitation by unscrupulous recruiters and employers, and are more at risk of being caught in forced or bonded labor.

Subcontracting and Multi-tiered Subcontracting Chains

Multi-tiered supply chains are common in the engineering and construction sectors, making it challenging to assure compliance at all levels. Inadequate human rights due diligence and a failure to identify and remedy risks across the supply chain may result in a company's facing criminal liability due to poor treatment of workers by contractors and subcontractors.

Migrant Workers

In some regions, the construction industry relies heavily on migrant workers, who often face heightened risks of labor abuse due to their less secure employment status and legal residence outside of their country of origin. Because of this status, migrant workers are more dependent on their employer and have fewer opportunities to raise concerns about their treatment. Low-paid migrant workers can also be subject to stigmatization and marginalization, increasing their vulnerability to abuse.

Navigating Cultural Norms

Cultural norms may vary greatly across the countries where engineering and construction companies work, resulting in differing views on the "normal" and appropriate treatment of workers. Some conduct which is considered normalized will be contrary to the standards set in this Principle and will need to be addressed.

Key Components for Consideration

- ☑ Companies should ensure policies and systems are in place that mandate treating workers with dignity, respect, and fairness and that ensure workers are not subject to harassment, discrimination, abuse, or inhumane or degrading treatment. Such policies or systems should set a minimum standard of worker welfare management and be regularly reviewed and assessed.
- ☑ Companies should conduct or commission a pre-assessment of the legal environment in any operating location to identify potential gaps relating to international labor expectations and the Building Responsibly Worker Welfare Principles.
- ☑ Companies should ensure their code of conduct and policies on ethical treatment are fully communicated in a format and language understood by all workers, especially those with low literacy skills.
- ☑ Companies should give a senior manager clear responsibility and resources for implementing the company's commitments to ensuring workers' dignity, respect, and fairness.
- ☑ Companies should ensure workers have access to a mechanism to report concerns, complaints, or potential violations of their rights.
- ☑ Companies should ensure all workers are subject to a standard pre-employment assessment and due diligence process to ensure workers freely consent to all work undertaken and to unearth any potential exploitation.
- ☑ Companies should take steps to ensure that contractor and subcontractor worker welfare management processes align with company expectations and minimum standards of compliance.
- ☑ Where practically possible, companies should engage clients regarding the Worker Welfare Principles, with a view to referencing them in the construction contract.
- ☑ Where practically possible, companies should engage other engineering and construction companies regarding worker welfare, with a view to raising the bar and sharing good practices.

Tools and Resources

- » [UN Guiding Principles on Business and Human Rights](#)
- » [ILO Helpdesk for Business on International Labor Standards](#)
- » [Stronger Together, Tackling Modern Slavery in the Construction Sector Toolkit](#)
- » [IFC, Managing Risks Associated with Modern Slavery](#)
- » [IPIECA, Company and Supply Chain Labor Rights Guidance](#)
- » [Verité, Help Wanted Toolkit, Understanding the Policy Context of Hiring, Human Trafficking and Modern-Day Slavery – A Brief for Responsible Business](#)
- » [UN Global Compact Good Practice Note: Meeting the Responsibility to Respect in Situations of Conflicting Legal Requirements](#)
- » [CIOB Construction and the Modern Slavery Act: Tackling Exploitation in the UK](#)

About Building Responsibly

Building Responsibly is a group of leading engineering and construction companies working together to raise the bar in promoting the rights and welfare of workers across the industry. We have come together to foster and ensure a better working environment for workers in the engineering and construction sector. Doing so will allow us to more effectively respond to client, stakeholder, and regulatory expectations and manage a healthier, more productive workforce.

For more information and resources to support implementation of these Principles, visit www.building-responsibly.org.

Principle 2: Workers Are Free from Forced, Trafficked, and Child Labor

Workers are not subject to forced, coerced, trafficked, bonded, child, or involuntary labor of any form.

Introduction

Applying the Building Responsibly principles in practice will be unique in every instance. This guidance note offers discussion around the potential issues and challenges faced and offers suggested good practice options for the implementation of each principle in the Key Components for Consideration section.

Construction is still largely dependent on manual labor, including low-skilled labor. This kind of labor may be subcontracted, and labor agencies may be used to meet aggressive program schedules, predisposing the sector to high risks of labor exploitation. An estimated 7 percent of the global workforce is employed in construction, yet the sector accounts for 18 percent of all identified cases of forced labor.

Indicators of Forced Labor

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Abusive working and living conditions
- Excessive overtime

Key Terms and Definitions

- » **Forced Labor:** Work or service exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. This definition consists of three elements:
 - “Work or service” refers to all types of work occurring in any activity, industry, or sector, including in the informal economy.
 - “Threat of a penalty” refers to a wide range of penalties used to compel someone to work. In the construction sector, examples of this include withholding wage or overtime payments to obtain work.
 - “Offered himself or herself voluntarily” refers to the free and informed consent of a worker to take a job and his or her freedom to leave at any time.
- » **Coercion:** Threats of serious harm or physical restraint, psychological manipulation, document confiscation, and shame- and fear-inducing threats to share information with others.
- » **Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- » **Bonded Labor:** Also known as debt bondage, this occurs when a person is forced to work to pay off a debt.

- » *Child Labor*. Work that deprives children of their childhood, potential, and dignity and is harmful to physical and mental development.

Key Challenges

Lack of Visibility of Vulnerable Workers

Given the complex nature of the subcontracting chain in major infrastructure projects, companies may have limited or no visibility into the debt status, pay level, mental state, and other on-the-ground realities related to the conditions of the most vulnerable workers in at-risk geographies. Even with audits, grievance mechanisms, or other communication channels, workers may conceal their abuses out of fear of retaliation or because they are not aware of their rights and protections.

Limited Awareness of Forced Labor

Given the complex nature of the exploitative practices that lead to forced labor, companies may find it challenging to identify victims of illegal trafficking or forced labor.

Recruitment Fees

When workers must pay to secure their jobs, they are liable to accrue significant debt and spend the first months and even years of their jobs paying back their recruiters and other intermediaries. This debt bondage affects half of all victims of forced labor imposed by private companies. Exploitative recruitment practices can be commonplace, can lack an adequate paper trail, and can have complex and non-transparent migration paths. In addition, many workers believe that it is acceptable. Because of these factors, engineering and construction companies can find it difficult to identify unethical recruitment and face challenges remedying it when they do.

Migrant Workers

Migrant workers are particularly vulnerable to exploitative labor contracts, especially when contract terms are in a language not clearly understood by workers. This is compounded by the challenging situation in their home countries and regions and their low levels of literacy and rights awareness.

Legal or Cultural Norms

In some countries, workers' mobility and access to personal documentation is restricted by law or in practice. The challenge for companies is to manage these restrictions that are contrary to international and national standards and ensure they have minimal negative impacts on workers' rights and mobility.

Hazardous Work and Child Labor

The employment of young workers on construction sites is challenging as many activities conducted are hazardous by nature because they involve demanding physical labor, work at height, or heavy machinery.

Key Components for Consideration

- ☑ Companies should have policies and systems in place that address child labor, forced labor, human trafficking, and/or the indicators of these, including sanctions on violators.
- ☑ Where possible, to reduce the risk of human trafficking and related forced labor indicators, companies should prioritize local recruitment over international recruitment, where risks of cross-border exploitative practices are higher.
- ☑ Where there is a reliance on low-skilled migrant workers, companies should conduct thorough due diligence processes on recruiters and specific training for staff.

- ☑ Where young workers are employed, companies should ensure that they have a robust system in place for age verification and have clearly identified the non-hazardous activities that young workers can undertake.
- ☑ Where possible, companies should require minimum rates of pay in contract conditions with subcontractors or with suppliers recruiting labor, where these are stated in the tender process.
- ☑ Companies should post clear job advertisements with details about the terms and conditions of work.
- ☑ Companies should provide workers with unrestricted access to their personal documentation (see GN7).
- ☑ Companies should provide workers with complete freedom to leave the work relationship at any moment, provided they respect the relevant notice period (see GN7).
- ☑ Companies should ensure and verify that workers have voluntarily consented to their role, employment contract, working hours, and overtime.
- ☑ Companies should ensure that all workers meet the minimum working age under the relevant legislation, but in no case less than the ILO general minimum age – regardless of local custom or laws.

Tools and Resources

- » [ILO, General principles and operational guidelines for fair recruitment and definition of recruitment fees](#)
- » [ILO: What is forced labor, modern slavery and human trafficking](#)
- » [ILO Helpdesk for business on International Labor Standards – Forced Labor](#)
- » [Sedex Guidance on Operational Practice & Indicators of Forced Labor](#)
- » [Lexis Nexis, Hidden in Plain Sight – Modern Slavery in the Construction Industry](#)
- » [ILO, Alliance 8.7: Global Estimates of Modern Slavery](#)

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Principle 3: Recruitment Practices Are Ethical, Legal, Voluntary, and Free from Discrimination

Workers shall be recruited through ethical and legal means whereby all recruitment shall be free from discrimination and all forms of involuntary labor, slavery, and trafficking. Companies should commit to responsible recruitment in their operations and prohibit the payment of fees by the worker. Conditions of employment shall be transparent and agreed upon in writing prior to commencing work in a language that is understood by the worker.

Introduction

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In some regions, to secure their jobs, construction workers may rely on recruitment agencies or intermediaries who identify, test, and recruit workers on behalf of the user companies. This process implies several expenses, including the agencies' recruitment fees as well as associated recruitment costs such as advertising, medical tests, training, pre-departure seminars, skills tests, and, in some cases, visas and airfares.

While the costs of recruitment should not be borne by the worker but by the employer, workers still frequently end up paying to secure their jobs. In most instances, these fees are illegal and are paid to sub-agents or other intermediaries who may or may not work for the recruitment agencies. This can perpetuate an unethical recruitment system that preys on vulnerable workers, particularly low-skill migrants, who may be exploited and end up in bonded labor, often with large and disproportionately high debts to repay.

Key Terms and Definitions

- » *Migrant Worker*: person who moves locations for the purpose of employment.
- » *Fair Recruitment and Migration*: recruitment process that respects the human and labor rights of migrant workers and offers them opportunities for decent work.
- » *Recruitment Fees*: any fees or costs incurred in the recruitment process for workers to secure employment or placement, regardless of the manner, timing, or location of their imposition or collection.
- » *Employer Pays Principle*: principle according to which no worker should pay for a job—the costs of recruitment should be borne not by the worker but by the employer.
- » *Bonded Labor*: Also known as debt bondage, this occurs when a person is forced to work to pay off a debt.

Key Challenges

Limited Availability of Local Workforce

In some countries with large engineering and construction projects, there may be a shortage of local labor or a skills mismatch. As a result, companies rely on migrant workers. These workers are often recruited through complex international recruitment systems where labor abuses may take place.

Differing Legal and Cultural Environments

Companies may recruit from countries with different laws and regulations, or no laws and regulations, regarding payment of fees. Navigating this uncertain legal environment is a challenge, in particular where workers might be expecting to pay a fee to secure employment and are unlikely to report this practice to the user company.

Risks of Abuse during the Recruitment of Workers

Countries of origin for migrant construction workers may have limited governance of the recruitment industry, weak enforcement mechanisms, and even corruption. These factors exacerbate the risk of unethical recruitment processes. It can be challenging for companies to understand the scale and severity of these risks or to find reliable recruitment agencies.

Vulnerability of Low-Skilled Migrant Workers

When low-skilled workers are recruited internationally, they are more vulnerable to abuse as they are less likely to know their rights. Any illegal recruitment fees they may pay will leave them heavily in debt. Low literacy levels, stigmatization, and discrimination may be additional challenges related to migrant workers.

Costs of Ethical Recruitment

Recruiting workers ethically, including paying all costs associated with the process, may result in companies' being less competitive on the price of their proposals for a new project.

Key Components for Consideration

- ☑ Where possible, companies should limit the use of labor suppliers and recruit directly and locally.
- ☑ Companies should identify and conduct due diligence on recruitment agencies to ensure that they are respectable and are not involved in human rights violations.
- ☑ Companies should check that the workers have a legal status to reside and work in the country and that they are not undocumented workers.
- ☑ Companies should engage partners to understand the cost structure of the recruitment process and should ensure that what they pay is enough to cover it all.
- ☑ Companies should adopt the Employer Pays Principle in recruitment agent agreements.
- ☑ Companies should ensure there are clear and robust contractual expectations around fair recruitment with recruitment agencies. This could include monitoring, the right to audit partners' practices, and the right to terminate the relationship in case of serious violations.
- ☑ Where possible, companies should limit or control the use of sub-recruitment agents and should develop schemes that incentivize ethical recruitment practices.
- ☑ Companies should give partners enough time and notice to recruit the workers needed.
- ☑ Companies should ensure workers are provided with comprehensive and transparent information about the conditions of recruitment, employment, and work, agreed upon in writing and in a language that the workers understand before any work begins.
- ☑ Where possible, companies should ensure that workers have received information on the labor law and on their rights in the country where they will work. Companies may consider using technology, pre-departure inductions, low literacy handbooks, handbooks in workers' native languages, etc.
- ☑ Where possible, companies should invest in a human resources team to conduct and monitor recruitment. Responsibilities of this team should include visiting recruitment centers and meeting workers before they travel.

- ☑ Companies should monitor the recruitment, mobilization, work, and termination process to ensure that the candidates are not charged any fees at any stage. This may include dialogue with recruitment agencies or formal audits of their processes to follow-up on contractual clauses and to ask for improvement where needed.
- ☑ Companies should provide workers with the means to report grievances or any activity that is inconsistent with the principles above. Companies may also use worker surveys to determine the nature and scale of the challenges in this area and to provide a basis for remediation, which should consider the reimbursement of any fees paid by the worker.

Tools and Resources

- » [Dhaka Principles for Migration with Dignity](#)
- » [ILO's Combating Forced Labor: A Handbook for Employers & Business](#)
- » [ILO General principles and operational guidelines for fair recruitment & Definition of recruitment fees \(2019\)](#)
- » [Human Trafficking and Business: Good Practices to Prevent and Combat Human Trafficking](#)
- » [Stronger Together, Tackling Modern Slavery in Business Toolkit](#)
- » [Qatar Foundation Mandatory Standards of Migrant Workers' Welfare for Contractors & Sub-Contractors](#)
- » [Danish Institute for Human Rights' Human Rights Compliance Assessment](#)
- » [Verité, Ethical Framework for Cross Border Labor Recruitment](#)
- » [Verité, Fair Hiring Toolkit](#)
- » [IHRB, Responsible Recruitment Gateway](#)

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Principle 4: Freedom to Change Employment Is Respected

Workers are free to refuse their contract; cancel and change their employment; and, where appropriate, return home travel at the end of their employment contract should be provided.

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In countries where the local workforce is limited and in other situations, the construction sector often relies on migrant workers. When workers migrate for work, whether internally or internationally, their right to work and reside in one location can be regulated by administrative requirements. In many places, the award of a visa or work permit may be linked to worker employment contracts, potentially limiting their options to freely change employment. This puts migrant workers in a vulnerable situation that, when associated with other practices such as recruitment fees, delays on payment, or retention of workers' personal documentation, may result in workers being forced to perform work in a place and under conditions that they would otherwise refuse.

Key Terms and Definitions

- » **Forced Labor:** Work or service exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. This definition consists of three elements:
 - "Work or service" refers to all types of work occurring in any activity, industry, or sector, including in the informal economy.
 - "Threat of a penalty" refers to a wide range of penalties used to compel someone to work. In the construction sector, examples of this include withholding wage or overtime payments to obtain work.
 - "Offered himself or herself voluntarily" refers to the free and informed consent of a worker to take a job and his or her freedom to leave at any time.

- » **Reasonable notice:** The notice period is the time that workers must continue working for their employers after they resign or are dismissed. Unless mentioned in an applicable collective or individual agreement, workers and employers are expected to give each other reasonable notice before severing their employment relationship. There is no common agreement on how long a reasonable notice period is, but it can reflect factors such as worker' skills, seniority, or length of service.

- » **Workers' Personal Documentation:** Workers' personal documentation in this context refers to identity documents such as workers' passports or any other forms of identification, driving license, work permits, and bank cards or other financial, vocational or academic documentation.

Key Challenges

Managing Restrictive Laws

Some jurisdictions require workers to secure approval from their employer to change jobs or exit the country. This puts companies in a position where, by following the law, they can impose restrictions on workers' right to work and freedom of movement.

Implementing Adequate Immigration Procedures

Employers that are not implementing immigration procedures adequately (visa, work permits, etc.) may leave their employees "undocumented." If they lack documentation, migrant workers may be considered illegal by local authorities and deported at any time.

Reflecting the True Cost of Recruitment

When workers exercise their right to change employment early in the employment contract, companies that have implemented good recruitment processes and paid for medical examinations, training, pre-departure seminars, skill tests, visas and airfare, etc. may not be able to recover these costs.

Key Components for Consideration

- ☑ Companies should allow workers to leave the work relationship and terminate the employment contract provided that workers give reasonable notice in accordance with national law, the collective agreement, or their employment contract.
- ☑ Companies should not levy administrative or financial penalties when workers terminate their contract early in accordance with national law, the collective agreement, or their employment contract.
- ☑ Companies should provide workers with access to all their savings and, in some circumstances, assistance with repatriation, even when workers terminate their contract early in accordance with national law, the collective agreement, or their employment contract.
- ☑ Companies should not prevent or hinder workers from seeking employment or from changing employment in the host country by placing restrictions that go beyond national law.
- ☑ Companies should assist workers in finding new work or should provide a proper compensation package in case of layoffs, including the costs of returning home for migrant workers.
- ☑ Companies should not retain workers' personal documentation as this may prevent workers from leaving their jobs or changing employers freely and may make workers more vulnerable to exploitation.
- ☑ Companies should implement all worker-related administrative tasks in due time to minimize the risk for workers of finding themselves in a restricted or illegal situation, which could create difficulties for workers when seeking new employment.

Tools and Resources

- » [ILO Recommendation No. 188 on Private employment agencies](#)
- » [Combating forced labour: A handbook for employers and business](#)
- » [Guiding Principles on Business and Human Rights \(principle 12, 19\)](#)
- » [Dhaka Principles for Migration with Dignity \(principle 10\)](#)
- » [A Guide to Implementing the Dhaka Principles](#)
- » [Sedex, Guidance on Operational Practice and Indicators of Forced Labour](#)
- » [IPIECA: Responsible Recruitment and Employment Guidance Document](#)

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Principle 5: Working Conditions Are Safe and Healthy

Workers have a safe and healthy work environment, subject to a robust health and safety management system that is compliant with all governing health and safety laws and regulations and is aligned with applicable international standards and industry best-practice. This includes access to safe and clean transportation and welfare amenities on project sites; and the promotion of transparent and external reporting regarding health and safety incidents.

Introduction

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By nature, engineering and construction involve a range of inherently hazardous activities, presenting risks that must be carefully controlled to prevent serious injuries and fatalities. Construction is recognized by the ILO as one of the most hazardous sectors for workers: one-sixth of all fatal accidents at work occur in construction. Ensuring the health and safety of workers is therefore a key challenge for the construction sector.

Key Terms and Definitions

- » *Well-being*: Relates to all aspects of workers' lives, from the quality and safety of their physical working environment to the conditions of their accommodations and personal well-being.
- » *Welfare Amenities*: Amenities that are necessary and adequate for the well-being of workers, such as washing, toilets, rest and leisure, changing facilities, and somewhere clean to eat and drink during breaks.
- » *Health and Safety Incident*: An unplanned or unwanted event that results in an injury or illness to an employee.
- » *Health, Safety, Security, and Environment (HSSE)*: HSSE covers the range of issues that are generally addressed in dedicated management systems that aim at providing a safe and healthy environment for workers.
- » *Personal Protective Equipment (PPE)*: Equipment worn by an employee to reduce exposure to hazards that cause workplace injuries and illnesses.

Key Challenges

Intrinsically Hazardous and Physically Demanding Nature of the Work

By nature, construction involves activities that may expose workers to physically demanding work as well as risks, including work at height, vehicle movement, heavy lifting, fall of materials, and excavations. Construction work may involve exposure to high temperatures, extreme weather, high noise levels, and potentially harmful substances like dust, fumes, chemicals, or biological agents. Musculoskeletal stress is also a risk.

Excessive Working Hours and Insufficient Rest Periods

Given the nature of construction work and demanding delivery schedules, employers may require workers to work more or longer shifts, with limited breaks or time off. The associated cumulative sleep

deprivation can cause worker fatigue and lead to accidents on the work site. Transportation of the workforce to and from the work site can compound the issue of worker fatigue by adding hours of unpaid, non-rest time for the workforce. Moreover, workers may request overtime to augment their wages or to obtain a preferred shift rotation.

Managing HSSE Standards within the Subcontracting and Supply Chain

Outsourcing and subcontracting have become more common across the engineering and construction sectors, making it more challenging to efficiently manage the risks associated with the workforce. This is particularly true regarding smaller subcontractors, who may not have fully developed health and safety management systems and increasingly rely on indirect, temporary, or casual workers, who may speak a variety of languages.

Insufficient Laws and Limited Worker Involvement

In many developing countries where large infrastructure development is taking place, the occupational health and safety laws and practices are limited, leaving workers, in particular the most vulnerable, with few legal protections.

Key Components for Consideration

- ☑ Companies should develop and implement an appropriate management system and supporting processes to prevent, identify and mitigate HSSE risks.
- ☑ Companies should ensure each workplace complies at minimum with local laws and industry standards and best practices.
- ☑ Companies should ensure provision of clean and sufficient welfare amenities.
- ☑ Companies should allocate clear responsibilities and resources to implement HSSE management systems at all levels.
- ☑ Companies should conduct regular risk assessments to identify potential HSSE hazards.
- ☑ Companies should provide information and frequent training to workers on issues such as basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures. This information and training should align with identified risks and be tailored to workers' education levels and language. Specific attention should be given to new and migrant workers.
- ☑ Companies should provide adequate preventive and protective measures, standard PPE, and specialized PPE where required, free of charge.
- ☑ Companies should develop and implement a system for reporting and management of occupational incidents and accidents and near misses. Companies' responses to reports should include thorough investigation and the development of mitigation measures to prevent recurrence.
- ☑ Companies should provide emergency prevention, preparedness, and response arrangements.
- ☑ Companies should enable workers to provide feedback and report incidents without fear of retaliation.
- ☑ Companies should ensure that workers do not work beyond legal limits or recognized standards for regular or overtime hours.
- ☑ Companies should ensure that all workers are empowered to stop work activities that they believe to be unsafe.
- ☑ Companies should provide transport from the work site to accommodation and welfare amenities. This transport should respect local legislation and collective agreements in place and follow international standards in road safety.
- ☑ Companies should ensure that subcontractors have appropriate HSSE management systems for their permanent and temporary workers.

Tools and Resources

- » [International Labour Convention No.155 on Occupational Safety and Health](#)
- » [ILO: Safety and Health in Construction Code of Practice – practical guidance for safety and health in the construction sector ILO Good Practices and Challenges in Promoting Decent Work in Construction and Infrastructure Projects](#)
- » [ILO Helpdesk on Occupational Safety and Health;](#)
- » [ILO Website on Health and Safety](#)
- » [World Bank, Environmental, Health and Safety Guidelines](#)
- » [OSHA – 29 CFR PART1926 and 29 CFR PART1910](#)
- » [IPECA Managing Fatigue in the workplace](#)
- » [IOGP Report 597: Fabrication site construction safety recommended the practice \(section 3\)](#)
- » [ISO 45001:2018 Occupational Health and Safety](#)
- » [ISO 14001:2015 Environmental Management](#)

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Principle 6: Living Conditions Are Safe, Clean, and Habitable

Workers, when provided with accommodation, have living conditions that are safe, clean, hygienic, and habitable, where consideration is given to their physical and mental health and well-being.

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Providing or facilitating the provision of accommodation for workers—particularly where migrant workforces are employed—is often an element of construction projects. Facilities to accommodate these workers may be either temporary, such as during the construction phase of a project, or more permanent, such as at an operational facility. Moreover, this accommodation may be either in camps or in existing housing in the local community, and it may be paid for either directly or through allowances paid to the workers to compensate them for accommodation costs.

Depending on the type of accommodation required, there are a range of factors relating to living conditions that should be considered. Delivering acceptable standards of living facilities for workers is key to maintaining a productive, safe, and healthy workforce and to improving the well-being of workers. In practice this means that several key elements relating to the design and operation of worker accommodation should be actively considered, including safety and fire safety, security, cleanliness and sanitation, the quality of food and sleep, access to healthcare, as well as (where relevant) cultural and religious needs.

The specific provisions included in this guidance note deal primarily with camp facilities for longer-term, large-scale, single-site construction projects and ongoing, long-term facility operations.

Key Terms and Definitions

- » **Habitable:** Accommodation that is safe and that can be occupied in reasonable comfort, providing the opportunity for personal care as well as rest and relaxation after the workday. Although standards may vary by region and according to how accommodation is provided, the premises should as a minimum adhere to the local building codes; provide protection against the elements with appropriate heating and ventilation; meet fire code standards; provide access to hygienic toilets and bathing facilities; provide for waste disposal; offer kitchen or canteen facilities; and provide required utilities such as water, power, and sewers.
- » **Well-being:** Relates to all aspects of workers' lives, from the quality and safety of their physical working environment to the conditions of their accommodations and well-being.

Key Challenges

Varying Conditions

There is no one-size-fits-all solution to worker accommodation. Construction projects vary in size, duration, and location. These factors determine the type of accommodation provided, from small, remote mobile camps to large worker accommodation that is set up to last many years.

Management Control and Responsibility

The company employing the workers does not necessarily have control over the living conditions offered, in particular when it is leasing existing housing. It is even more challenging to ensure adequate accommodation when workers are provided with an allowance to secure their own accommodation.

Workers' Rights and Freedom of Movement

In some contexts, access to worker accommodation may be restricted to ensure the health, safety, and security of the workers and of the communities living around the accommodations.

Cultural and Religious Sensitivities

There are cultural and religious sensitivities that may pose management challenges as they require consideration of issues such as dedicated catering, facilities for religious observance, and segregation of genders in sleeping, eating, and sanitary facilities. In some cases, social tensions may arise from workers sharing limited facilities in remote locations or where there is a mix of nationalities or ethnicities.

Key Components for Consideration

(The detail of this baseline checklist is primarily applicable to large fixed camps for long-term, large construction projects or for camps for ongoing facility operations. However, at the highest level, each item is broadly applicable to all types of accommodation.)

Management and Oversight

- ☑ **General Management:** Companies should develop a written worker welfare plan for worker accommodation, covering topics including maintenance, security, health and safety, living conditions, and relationships with the communities. In developing the plan, an environmental health risk assessment should be performed. Rules and regulations should be reasonable and non-discriminatory, and a mechanism to provide feedback on problems with facilities should be established.
- ☑ **Indirect Management:** When accommodation services are procured from a third party, companies should have standard processes in place to manage the initial procurement and to periodically assess living conditions in the facilities.

General Conditions

- ☑ **Building Construction:** Companies should ensure that worker accommodation meet local building codes and are of sound construction and resistant to extreme weather events. Worker accommodation should meet all passive and active fire safety requirements, including fire and gas detection systems, and should be located away from site-specific hazards such as blast zones or toxic fumes.
- ☑ **Medical Facilities:** Companies should ensure that adequate medical facilities, equipment, and personnel are available, depending on availability and quality of local facilities.
- ☑ **Heating/Air Conditioning/Ventilation:** Companies should ensure that heating, air conditioning, ventilation, and noise control in sleeping accommodation and recreational facilities are appropriate to the climate and local standards and provide a comfortable and healthy environment to rest.

Accommodation and Sanitation Facilities

- ☑ *Sleeping Facilities:* Companies should ensure that sleeping facilities provide workers with an adequate level of privacy, and that a separate bed and mattress for each worker is provided. The sleeping facilities should be kept clean and in good condition to allow proper rest.
- ☑ *Bathing Facilities:* Companies should ensure that showers and wash basins are appropriate to the number of workers; segregated by gender; in proximity to the sleeping facilities; kept clean, adequately ventilated and lighted; in good working condition, and allow privacy.
- ☑ *Toilet Facilities:* Companies should ensure that toilet facilities—including toilets, urinals, and sinks—are appropriate to the number of workers, adequately ventilated and lighted, segregated by gender, kept in a clean and fully working condition, and allow privacy.
- ☑ *Waste Treatment:* Companies should ensure that wastewater and solid waste treatment complies with local standards or with the IFC's Environmental, Health, and Safety Guidelines for Water and Sanitation where local standards are unavailable. It must be designed to prevent contamination and avoid the spread of infection and disease and the proliferation of mosquitoes, flies, rodents, and other pest vectors.
- ☑ *Access to Water:* Companies should ensure that clean water, both potable and for washing, is always readily available to prevent dehydration and diseases resulting from lack of hygiene.

Communal Facilities

- ☑ *Leisure, Social, and Telecommunication Facilities:* Companies should ensure that basic leisure and social facilities for rest and recreation during free time are provided, as well as means to communicate with family, such as access to internet to alleviate homesickness and feelings of isolation. Where possible, companies should provide space for religious observance.
- ☑ *Canteen, Cooking, and Laundry Facilities:* Companies should ensure that canteen, cooking, and laundry facilities are adequate to the number of workers and that equipment is clean, sanitary, and operational. Services are provided for free or reasonably priced, never above the local market price. When caterers are contracted to provide food service, specific dietary needs of workers should be incorporated into the specifications. A healthy mix of food options should be offered, and food should be of sufficient quality and quantity. Hygiene standards should be met. Third party kitchen inspections should be held regularly, and inspection reports should be filed.

Transportation

- ☑ *Transportation:* Companies should ensure that transportation that is safe, comfortable, and easily accessible is provided to the worksite from the housing facility and back. Transport should also be available for access to leisure facilities, banking, or shopping if the housing is remotely located.

Tools and Resources

- » [ILO Workers' Housing Recommendation 115](#)
- » [IFC / EBRD, Workers' accommodation: processes and standards](#)
- » [IFC Environmental, Health, and Safety Guidelines for Water and Sanitation](#)
- » [IOGP, Temporary onshore accommodation – Design, layout, accommodation, facilities and services](#)

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Principle 7: Access to Documentation and Mobility is Unrestricted

Workers have access to passports and personal documentation at all times. Workers shall have freedom of movement outside normal working hours, unless there are legitimate safety or security issues that might threaten the health, safety, or well-being of the worker.

Introduction

Applying the Building Responsibly principles in practice will be unique in every instance. This guidance note offers discussion around the potential issues and challenges faced and offers suggested good practice options for the implementation of each principle in the Key Components for Consideration section.

In many countries where large infrastructure and construction activities are taking place, workers' mobility and access to personal documentation is restricted by law or in practice. These practices are often associated with forced labor. The challenge for companies is to manage these restrictions while ensuring minimal negative impacts on workers' rights and mobility.

In addition, when workers migrate for work, whether internally or internationally, their right to work and reside in one location can be regulated by strict administrative requirements. As a result, workers might become vulnerable through their reliance on third parties—their employers or recruitment intermediaries often manage the administrative steps that are needed to secure visas, permits, licenses, or any other local identity documents.

Key Terms and Definitions

- » *Access to Documentation:* Allowing worker's access to their passports or other identity or personal documentation at all times without having to rely on a third party or follow a request process.
- » *Document Retention:* The practice through which employers retain a worker's personal documentation. The retention of workers' documents is linked to workers' not being able to leave their job or change employer. It also prevents workers from returning to their home country, making them more vulnerable to exploitation.
- » *Forced Labor:* Work or service exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. The retention of workers' personal documentation and the requirement to work to pay off debt accrued in securing a job are indicators of non-voluntary and potentially debt-bonded and forced labor.
- » *Mobility:* Mobility refers to the possibility for workers, when they have completed their daily working hours, to move freely outside of their workplace or worker accommodation. Such mobility is generally exercised to go back home, run errands, and go to private and public places for any reason (shopping, socializing, entertaining, etc.) when workers live in employer-provided accommodation.
- » *Workers' Personal Documentation:* Workers' personal documentation in this context refers to identity documents such as workers' passports or any other forms of identification, driving license, work permits, and bank cards or other financial documentation, vocational, or academic documentation.

Key Challenges

Managing Administrative Processes

Companies routinely require access to workers' personal documentation for legitimate administrative or legal purposes, such as the renewal of visas or work permits. During this time, it can be difficult for workers to retain access to their personal documentation.

Safekeeping of Workers' Personal Documentation

In some countries or locations, particularly where there are exceptional security concerns, safekeeping of workers' personal documentation is important. Measures might involve storing workers' passports or travel documents. As a result, workers' access to their documents might be temporarily limited.

Measures that Limit Mobility

Where a legitimate risk to the health, safety, and security of the workers or the surrounding communities exists—especially around worker accommodation—companies may need to take measures to restrict workers' mobility to ensure the workers' and communities' health, safety, and security.

Restrictive Laws

In some jurisdictions, workers are required to secure approval from their employer to change jobs or exit the country. In such cases, companies may restrict workers' freedom of movement or right to work to ensure that workers are not negatively impacted by such restrictive laws.

Key Components for Consideration

- ☑ Companies should strictly prohibit the confiscation of workers' personal documentation or undue limitation of worker mobility by business partners and should implement strict mitigation measures.
- ☑ Companies should ensure that workers have unrestricted and immediate access to their passport and personal documentation.
- ☑ Companies should prefer safekeeping of passport and personal documents to be handled directly by workers. In any instance where workers do not retain their personal documentation, companies should provide them with photocopies.
- ☑ Where worker personal documentation is temporarily required by companies, whether for legal or administrative purposes, the company should obtain the consent of the worker in writing, and documentation should be returned as soon as it is no longer required by the company.
- ☑ Companies should have policies and procedures in place to manage workers' access to documentation and mobility. Policies and procedures should aim to justify and minimize the impacts of any restrictions.
- ☑ Where possible, companies should clearly inform job candidates of any processes involving the management of personal documentation or limitations on mobility prior to recruitment and deployment, to ensure that potential employees can decide whether such conditions are an acceptable part of the employment.
- ☑ Where possible, companies should provide workers with personal safe storage facilities that are always accessible.
- ☑ Companies should provide workers with complete freedom of movement outside of working hours, unless restrictions are required for legitimate safety or security reasons. In such cases, companies should ensure that restrictions are strictly limited to measures necessary to preserve and protect workers' and communities' health, safety, and security.
- ☑ Where possible, companies that operate worker accommodations that are distant from malls, parks, or other areas where workers can socialize should strive to limit the negative impact of such distance by providing easily accessible and safe transportation.

Tools and Resources

- » [ILO, Q&As on Business and Forced Labour](#)
- » [UNGC, Addressing the retention of identity documents](#)
- » [IPIECA, Responsible Recruitment and Employment Guidance Document](#)
- » [ICCR, Best Practice Guidance on Ethical Recruitment of Migrant Workers](#)
- » [Sedex, Guidance on Operational Practice and Indicators of Forced Labour](#)
- » [IHRB, Fees and IDs: tackling recruitment fees and confiscation of workers' passports](#)
- » [BIICL, When national law conflicts with international human rights standards: Recommendations for Business](#)

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Principle 8: Wages and Benefit Agreements Are Respected

Workers are paid their agreed wages regularly and on time. Workers will receive all benefits to which they are entitled in accordance with contractual arrangements.

Introduction

Applying the Building Responsibly principles in practice will be unique in every instance. This guidance note offers discussion around the potential issues and challenges faced and offers suggested good practice options for the implementation of each principle in the Key Components for Consideration section.

Wages and benefits govern much of the relationship between workers and their employers. Issues surrounding wages and wage payments also constitute the most common concern expressed by workers. Refusal to pay wages or non-justified deductions of wages may constitute a breach of wage and benefit agreements. Additionally, delayed payment of wages can result in significant financial stress on the employee and may be an indicator of forced labor.

Key Terms and Definitions

- » *Wages*: a fixed regular payment earned for work or services, typically paid on a weekly or monthly basis.
- » *Benefits*: various types of non-wage compensation such as paid holidays, health insurance, pension plans, and food vouchers, provided to employees in addition to their normal wages or salaries.

Key Challenges

Minimum Wage Regulations

In some countries and regions, there may be no applicable minimum wage laws, or where such laws do exist, they are not enforced or may be deemed outdated. As a result, workers may not necessarily receive an equitable wage that affords them a decent standard of living.

On-time Payment of Wages

Delays in the payment of wages may result in operational disruption, financial stress on the worker, and strain on the worker's personal circumstances, as well as increase the vulnerability of worker to of forced labor practices.

Overtime Pay

Workers may not receive adequate overtime pay for their extra hours, particularly where laws governing overtime are limited and where employment contracts are not sufficiently explicit.

Wage Discrimination

In some regions where migrant workers are employed, minimum wage laws may not exist, or minimum wages and benefits for migrant workers are generally organized through bilateral agreements between the sending and the receiving countries. As a result, minimum wages paid to workers of different nationalities for work of equal value can vary.

Wage Transparency and Communication

A lack of clear and transparent communication around wage agreements and any financial deductions may result in workers not receiving expected wages and benefits. Failure to sufficiently communicate to workers their wages and benefits and to confirm their understanding may be interpreted as intentional deception.

Complex Subcontracting Chain

Timely payment of wages can be a challenge, particularly when subcontractors are underfinanced and can pay their workers only when they are themselves paid. Similarly, outsourcing labor requirements to manpower/temporary employment agencies, which may further outsource payroll to umbrella companies, devolves responsibility for timely and full payment of wages and increases the risks of “wage theft” (or cheating workers of their due wages)

Key Components for Consideration

- ☑ Companies should provide wages and benefits in line with or above the industry standard and always in compliance with local labor laws and regulations.
- ☑ Companies should communicate clearly on wages, benefits, deductions, and details regarding overtime pay, including through direct references in workers’ contracts.
- ☑ Companies should provide equal wages for work of equal value without discrimination of any kind.
- ☑ Companies should pay wages and benefits at agreed interval, in full and without any delay. Employees should have easy access to a complaint mechanism if they have not been paid in time and in full.
- ☑ Companies should pay wages directly to the individual and not to third parties unless due diligence has been conducted to ensure that the worker is fairly treated.
- ☑ Companies should keep accurate payroll records and monthly proof of payment of wages, clearly indicating all wage deductions
- ☑ Companies should provide workers with information in the form of a pay stub listing the hours worked and wages and benefits paid.
- ☑ Where possible, companies should favor payment of wages via bank transfer.
- ☑ Companies should limit wage deductions to those provided for by national law or included in wage agreements or employment contracts. Companies should clearly communicate such deductions to workers before the start of the employment.
- ☑ Companies should prohibit wage deduction as a disciplinary measure.
- ☑ Where wage advances or loans are provided to workers, companies should not charge interest.
- ☑ Companies should pay their subcontractors and/or labor agencies on time and contract with companies that have a good record of timely payment of wages.
- ☑ Where possible, companies should make regular checks to confirm that workers employed by subcontractors or/or labor agencies have been paid.

Tools and Resources

- » [ILO Helpdesk on wages and benefits](#)
- » [ETI Living Wage Standard](#)
- » [ILO: Migrant Work & Employment in the Construction Sector](#)
- » [Engineers against Poverty: Protecting the Wages of Migrant Construction Workers](#)

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Principle 9: Worker Representation is Respected

Workers have the right to freedom of association. In countries where the right to freedom of association is restricted under law, companies should recognize the right of workers to develop alternative means for independent and free association and to communicate and promote their rights and welfare.

Introduction

Applying the Building Responsibly principles in practice will be unique in every instance. This guidance note offers discussion around the potential issues and challenges faced and offers suggested good practice options for the implementation of each principle in the Key Components for Consideration section.

Worker representation, which is based on values such as transparency, collaboration, engagement, participation, consultation, and inclusiveness, is generally governed by local laws allowing workers to voice their concerns and represent their interests. In many countries where relevant local law falls short in protecting worker representation and association, companies seek to provide alternative ways for workers to represent and voice their interests. Having a means to engage in open and transparent discussions with workers is key to maintaining a safe, healthy, and productive work site and accommodation.

Key Terms and Definitions

- » *Freedom of Association:* The right of workers to form and join, or not join, organizations of their own choosing for the representation of their own interests.
- » *Worker Representation:* Any system or committee set up, on site, or at the company level, to address workers' concerns on various topics including living and working conditions, health and safety, and payment of agreed wages and benefits.
- » *Worker Representative:* Workers who represent legitimately and inclusively the interests of other workers.

Key Challenges

Restrictive Laws

In some countries, freedom of association is limited and may even be prohibited by law. In such instances, workers do not have access to legally protected forms of representation that would enable them to voice their concerns without fear of reprisal. As a result, companies may face challenges in developing communication mechanisms to enable the voice of their workforce and sufficiently capture the concerns of workers.

Inclusive Representation

The legitimacy or inclusiveness of worker representation and the capacity of worker representatives to represent others in diverse environments may present a challenge. Specific challenges may include:

- Ensuring appropriate representation for minorities, women, or vulnerable groups within the workforce
- Accounting for cultural and language differences
- Ensuring appropriate representation for different employment categories or worker classifications (e.g. craft, local, migrant, expatriate, seconded/posted workers)

Casual Labor

On some projects, casual workers may be recruited for short-term, low-skill work. These workers are seldom represented within traditional forms of worker representation and generally lack knowledge or information about their rights.. This is often the case when casual workers are migrants. In addition, as they do not have a long-term contract in place, they are more vulnerable to retaliation and may therefore be afraid to speak up.

Key Components for Consideration

- ☑ Companies should establish a culture of trust and ensure genuine, inclusive worker representation that accounts for differences and that values the contributions of all workers.
- ☑ Companies should respect workers' freedom of association and identify any barriers to inclusive worker representation, such as laws prohibiting representation or cultural norms that may inhibit certain workers from voicing concerns and should identify mitigation strategies to overcome these challenges,
- ☑ Companies should identify vulnerable groups of workers on the project site and develop appropriate lines of communication with these groups. These could include worker forums or issue-specific committees.
- ☑ Companies should ensure that the project has appropriate governance mechanisms in place (rules, policies, processes) to safeguard worker representation. These might include a code of conduct, a non-retaliation policy, and a grievance mechanism.
- ☑ Companies should ensure that language and literacy, or other social drivers, are not barriers to worker representation, especially for migrant labor groups.
- ☑ Where possible, companies should encourage its supply chain to adopt open communication with workers and their representatives.
- ☑ Where possible, companies should engage local stakeholders and support industry to bring local law in line with internationally accepted labor standards and to remove barriers to worker representation.

Tools and Resources

- » [ILO Helpdesk on Freedom of Association](#)
- » [ILO Good Practice on Freedom of Association](#)

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Principle 10: Grievance Mechanisms and Access to Remedy are Readily Available

Workers have, and are aware of, the means to report grievances or any activity that is inconsistent with these Principles without fear of retaliation, retribution or dismissal, and to have them addressed in a prompt, fair, and consistent manner.

Introduction

Applying the Building Responsibly principles in practice will be unique in every instance. This guidance note offers discussion around the potential issues and challenges faced and offers suggested good practice options for the implementation of each principle in the Key Components for Consideration section.

Having an effective process in place which seeks out concerns and issues, in a fair and independent way, helps to foster trust and accountability across a company. Healthy companies are those that actively seek out problems and encourage all stakeholders to call out practice(s) that may be perceived as unsafe, unfair or punitive. Ensuring that these mechanisms are accessible and creating a safe environment for vulnerable worker groups are imperative in identifying issues and resolving them quickly. Establishing an effective reporting process that enables workers to report issues safely, anonymously, and without fear of retaliation can help to avoid social disruption, work stoppages, workforce turnover, and other adverse outcomes for all stakeholders.

Grievance Mechanism: Example of Effectiveness Criteria

- *Legitimate*: Enabling trust from the stakeholder groups for whose use they are intended, and accountable for fair conduct.
- *Accessible*: Being known to all stakeholder groups for whose use they are intended and providing adequate assistance for those who may face particular barriers to access.
- *Predictable*: Providing a clear, known procedure with indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation.
- *Equitable*: Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise to engage on fair, informed and respectful terms.
- *Transparent*: Keeping parties to a grievance informed about its progress and providing sufficient information about the mechanism's performance to build confidence in its effectiveness.

UN Guiding Principle on Business and Human Rights

Key Terms and Definitions

- » *Grievance*: An allegation, issue, or problem that a worker raises in relation to his or her experience at work. A grievance may relate to working conditions, living conditions, employment practices, unfair treatment, or other job-related concerns.

- » *Grievance Mechanism*: A process through which a grievance can be raised (including anonymously), assessed, investigated, and responded to, without retribution.
- » *Remedy*: Effectively address and provide resolution to worker concerns.
- » *Resolution*: The actions taken to rectify or appropriately address a grievance. Resolution may include remedy in the case of adverse impacts, or other actions that address the concern raised, such as clarifying or reviewing procedures with the worker.

Key Challenges

Trust, Accessibility, and Adoption

Fostering awareness and trust among workers to use grievance mechanisms can be difficult. If there is mistrust in the process, workers are less likely to report an issue and may seek to ensure anonymity of their complaints through outside channels, with the potential to inhibit a full investigation and ultimate resolution. Language and cultural differences, as well as negative perceptions or stigma around expressing concerns, add further challenges. Income dependence can also affect workers' tolerance for adverse situations.

Clear Communication of Grievance Mechanisms

In some cases, there may be a variety of means to report workplace- or project-related issues, such as health and safety incident reporting, employee suggestion boxes, ethics hotlines, and community or third-party grievance mechanisms. As a result, communication on what to report and where may not be fully understood by the worker.

Customization and Local Context

A “one-size-fits-all” approach, to consistently roll out grievance mechanisms on every project and contract type, may not be possible. Flexibility and customization may be required to maintain an effective process. Site considerations may include:

- Appropriate channels for workers to access the grievance mechanism
- Accessibility for contracted and third-party workers
- Project-specific issues, such as multiple work sites or company-provided accommodations

In some contexts, companies may find it challenging to adopt traditional ways or local systems of managing grievances, which in turn may affect their ability to influence the outcome and speedy resolution. Additionally, cultural differences may result in contradictory interpretations of the fairness of the process, the actual grievance raised, and the effects, ultimately making the resolution process more difficult.

Subcontracting

A challenge for many large prime contractors in relation to indirect labor and contractual agreements is the level of influence or control the company has over any grievance mechanisms. This may pose several challenges, such as gaining agreement on the process components (e.g., identification, investigation, and resolution) and agreeing to one grievance mechanism rather than several different programs on one project.

Key Components for Consideration

- ☑ Companies should put in place grievance mechanisms that enable workers to raise issues, on any topics such as travel and living conditions, health and safety, wages and benefits, or discrimination and harassment, with the guarantee of confidentiality and the option to remain anonymous.
- ☑ Companies should ensure that grievance mechanisms are accessible to all direct and indirect workers and other stakeholders in languages and formats that promote inclusivity.
- ☑ Companies should ensure clear, effective communication of the grievance process to all workers in a language and format they understand. This should include communication around access, guidance on process, and explanation of the governance procedures (including escalation or appeal).
- ☑ Companies should ensure a clear and independent process is in place to manage and investigate grievances, while ensuring the person(s) raising any concern is treated fairly, kept informed, and protected from retaliation.
- ☑ Companies should provide sufficient resources and relevant training and competencies to address and manage all grievances with a view to resolution.
- ☑ Companies should address issues and concerns promptly and provide responses or updates (even before the final response is ready) in a timely manner to the worker(s) raising the grievance.
- ☑ Companies should allow for the confidential and anonymous submission of concerns via multiple channels that do not require a physical appearance (e.g., hotlines, online forms, written submittals in unmanned boxes).
- ☑ Companies should document all grievances and resolutions, and should publicly post, if appropriate, responses to anonymous issues/concerns.
- ☑ Companies should assess grievance mechanisms periodically to share lessons learned and good practices and to promote continuous improvement. This should include input from those using the grievance process. Where possible, metrics should be used to measure process performance.
- ☑ Companies should require subcontractors to establish adequate channels/mechanisms for complaints and concerns

Tools and Resources

- » [UN Guiding Principles on Business and Human Rights, Principle 31](#)
- » [International Finance Corporation, Performance Standard on Labor and Working Conditions, Principle 20](#)
- » [Investor Primer on Grievance Mechanisms, CERES and Engage the Chain](#)
- » [IPIECA, Worker grievance mechanisms: Guidance document for the oil & gas industry](#)
- » [Verité HELP WANTED Toolkit, Establishing Effective Grievance Mechanisms, Tool 2 Evaluating the Effectiveness of Grievance Mechanisms](#)
- » [Somo, What are grievance mechanisms?](#)
- » [Shift, Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights](#)

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