

## **ANNEX 4: DATA COLLECTION/ANALYSIS, OBJECTIVES OF ENHANCEMENT PLAN AND INTEGRATION INTO MANAGEMENT SYSTEM**

### **1. DATA COLLECTION & ANALYSIS DURING AND POST FORCED LABOUR REMEDIATION**

Examination of the effectiveness of the forced labour remediation process and protocol should be data-driven. Hence, key data points regarding the forced labour remediation process should be documented and recorded to allow for analysis.

Below is a non-exhaustive list of illustrative data points that can facilitate the continuous review of the remediation process and thus should be identified and recorded by the company (ideally, the data can be aggregated, filtered, sorted, and cross-referenced to enable analysis):

- The reporting channels for the intake of forced labour cases;
- Number of cases from each intake source;
- Name of any concerned business, date, and identified issues relevant to each case;
- Type and tier of the concerned business;
- Relevant geography of cases;
- Number of cases from each severity level (high, medium, low);
- Basic demographic data of affected workers (e.g., foreign migrant workers, temporary workers, gender minorities, young workers, etc.);
- Time taken for completion of verification of the case;
- Time taken for completion of investigation of the case;
- Time taken for determination of responsibility and response;
- Number of cases that are verified, partially verified or unverified after the investigation phase;
- Causation and root cause analysis results;
- Time taken for development of and implementation of remediation programme;
- Types of remediation/corrective action and corresponding responsible entity;
- Number and type of remediation/corrective action that is completed within the designated timeframe;
- Feedback data regarding the effectiveness of the remediation programme from affected individuals, workers, trade unions, and any other communities/groups collected during the post-remedy monitoring;
- Record of the ability of the concerned business to verify and remediate forced labour cases (to gain insight into their risk management capacities to enable better resource deployment wherever needed, such as building supplier capabilities);
- Documented remedy expectations of affected workers in relation to the issue identified in the alert (to incorporate continued improvements to remediation efforts).

### **2. OBJECTIVES OF ENHANCEMENT PLAN**

A corresponding enhancement plan on forced labour remediation should be developed based on the results of each review process (yearly). At a high level, the enhancement plan should seek to achieve the following objectives:

- Continue support and reinforcement of identified strengths and well-performing processes;

- Addressing weaknesses and obstacles towards achieving the objectives of the remediation protocol (e.g., insufficient data for completing the investigation, lack of access to lower tier supply chain partners, etc.);
- Improving efficiency and resource management (e.g., reducing time taken for verification, investigation, remediation, post-remedy monitoring, etc.);
- Ensuring appropriate resources and capacity (e.g., areas that will benefit from further developing internal capabilities, know-how and specialisation on subject matter);
- Improving cross-functional optimisation (e.g., leveraging remediation data for human rights due diligence, audits and assessments).

Enhancement plans should include specific action items and measurable objectives, timebound commitments to completion, and designated responsible persons.

### 3. INTEGRATION INTO MANAGEMENT SYSTEMS

The feedback, learnings and data gained from the resolution of forced labour cases should also be used, where possible, to aid and improve the operations of other functions of the company, such as risk management processes, grievance handling and human rights due diligence processes.

Specifically, the company should consider:

- Feeding back information gaps identified during the remediation process to inform improvements to the intake source;
- Feeding alert resolution data into existing supply chain partners monitoring processes such as audits and assessments to identify high-risk partners. This information can also update and further inform risk data and ratings of supply chain partners.
- Making remediation process data accessible to adjacent teams (e.g., procurement) whose work requires better insights into profiles of supply chain partners and to management teams that review/decide management policies and procedures with supply chain partners.
- Sharing aggregated data (e.g., frequency and pattern) of alert(s), verification and investigation results, and remediation/corrective actions with teams that monitor/manage supply chain risks to help identify risk markers related to adverse human rights impact. Relevant data points may include, but are not limited to:
  - *Nature of the conduct;*
  - *Cohort of affected individuals and/or groups (e.g., ethnicity, gender, sexuality, religion, age, nationality, and other vulnerable groups);*
  - *Geography or location of the relevant supply chain partner; and*
  - *Sector/industry of the relevant supply chain partner.*

These steps outlined are non-exhaustive examples. The value of, and opportunities to leverage, such data will also evolve as related processes evolve and change. In all cases, breaking down information silos can boost the efficiency of adjacent processes and enhance the company's ability to identify and manage risks in its supply chains.

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