



# RESPONSIBLE SOURCING TOOL

Facilities  
Services |  
Tool 6

## PROTECTIONS AGAINST TRAFFICKING IN PERSONS

### Supply Chain Mapping and Risk Screening in Facilities Services

*As described in RST Base Tool 6, supply chain mapping allows a company to identify the footprint of their operations. A company with a full understanding of its supply chain and operational footprint can more accurately target detailed risk assessments and interventions, thereby working to mitigate their risk of human trafficking. The concept of identifying chains of suppliers and tracing products back to their original source can be applied to the mapping and tracing of labor supply chains in the facilities services industry as well. Companies can use supply chain mapping to prevent human trafficking among services staff they employ or that are employed by their suppliers.*

*The primary human trafficking risks in facilities services arise from the recruitment and hiring of a worker. By gaining information on how facilities services workers are recruited, hired, and managed at each level of operations and identifying any intermediaries involved, companies can gain deeper insight into their labor supply chain. This insight can help companies identify where and how risk might manifest. In some cases, facilities services providers hire personnel directly; in such cases the company might already have high visibility into the recruitment processes and intermediaries involved. However, in many other cases, employees are hired through labor recruiters, or the company may subcontract to a secondary provider that itself uses labor recruiters who in turn use agents and sub-agents to hire workers. Each layer can reduce visibility into how site services staff are hired and increase risk.*

*This tool provides guidance on how companies, especially users of facilities services providers, can use supply chain mapping to prevent human trafficking among facilities services workers. The tool describes different types of labor supply chain scenarios common among the facilities services sector and shows how risk screening can be conducted for each layer of actors in the labor supply chain. It also outlines risks associated with types of worksites in which facilities services workers might be employed. Companies can use labor supply chain mapping to better understand how facilities services workers are hired and the conditions of where they work.*

*For a basic guide to overall supply chain mapping, including suppliers of goods to facilities services companies, such as cleaning supplies, tools and equipment, and computers, please see RST Base Tool 6.*

## INTRODUCTION TO FACILITIES SERVICES SUPPLY CHAIN MAPPING

The Facilities Services sector comprises many different types of providers, including janitorial services, facility maintenance, laundry and housekeeping services, grounds maintenance, guarding/security services, food and catering services, and waste management services. These services are not typically provided by the same company, but they share characteristics as an industry, in that the jobs are all relatively low-skilled and labor-intensive and are associated with the basic operation and maintenance of facilities. Virtually all facilities require janitorial, landscaping, security, and waste management services, while laundry and housekeeping services are more intensively associated with the hospitality sector and residential facilities such as hospitals, military bases, and prisons.

Staffing in the sector ranges from the informal employment of individual housekeepers or gardeners to the formal sourcing of whole workforces from employment agencies that specialize in providing facilities-related services to clients. Workers may be full-time or part-time direct employees of the services company, contract workers employed by an agency, or independent contractors.

Product inputs to the sector consist mainly of cleaning supplies, pesticides and herbicides, uniforms, fresh and prepared foods (please refer to the Food and Beverage tools), tools and equipment, and vehicles.

Unlike workers in industry sectors where the work is performed at the employer's worksite, most facilities services employees work at one or more worksites owned and operated by a direct client of the facilities services provider (such as a factory owner) or by a tenant of the client company, typical of an office building where the building is owned by a real estate company and leased to multiple tenants. Because of this, facilities services workers may be exposed to hazards and labor rights abuses not entirely under the control of their employer, such as health and safety hazards, harassment and abuse by client or tenant company employees, and limited freedom of movement as a result of client company restrictions.

Regardless of the work environment, by far the most significant risk of human trafficking in the sector derives from the supply of labor.

Types of suppliers found in facilities services supply chains include:

- Producers and suppliers of cleaning supplies, pesticides and herbicides

- Manufacturers and suppliers of uniforms (including laundries)
- Manufacturers and suppliers of power and hand tools, industrial trucks, and vehicles
- Manufacturers and suppliers of telecommunications equipment, computers and other electronic products
- Primary producers/growers/farmers, processors, and distributors of fresh and prepared food products.
- Facilities for waste disposal, treatment, and recycling

Through this mapping process, companies can gain an understanding about the geography and structure of their supply chains, which can be used to inform risk assessment efforts (see below).

Information can be gathered from:

- supplier self-assessments/self-reporting
- supplier and worker interviews
- supplier site visits/audits (documents, records)
- receipts and purchase orders

Once a map of suppliers is assembled, a company can begin to identify geographic regions, products, or particular suppliers most likely to have elevated human trafficking risk in their operations. A solid initial approach to risk screening involves identifying the risks associated with the service sector or industry in question, in combination with the risk factors associated with the countries in which the supply chain operates or from which it draws its workforce. Ideally, a company will assess the risks of a specific supply chain in a specific geographic location. For example, while a country overall may have low rates of migrant workers, migrant workers may be concentrated in certain types of services providers. Examining supply chain and country in combination also allows for a more thorough review of incidents of exploitation previously documented.

In supply chains characterized by sector, location-based human trafficking risk, or both location and sector, companies should exercise heightened due diligence through efforts to enhance visibility into individual supplier practices.

There are a variety of commercial and public resources available to assist with human trafficking risk screening at the level of sector/industry and geographic location — the

resources at <https://www.responsiblesourcingtool.org/> provide insight into the factors listed below.

## POTENTIAL COUNTRY RISK FACTORS IN FACILITIES SERVICES LABOR SUPPLY CHAINS

It is important for companies to understand any potential structural risk factors for human trafficking related to the country in which they are operating and hiring facilities services.

Where migrant workers are present in significant numbers, an assessment of labor origin countries can help illustrate potential trafficking risks for migrant workers in the recruitment phase.

- 1. Legal/Policy Risk Factors** (see Facilities Services Sector Tool 4 for more information on legal and policy risk):
    - a. What level of legal protection for workers' rights does the law provide?
    - b. Are these legal protections extended to migrant or non-citizen workers?
    - c. What ILO Conventions on forced labor or rights of workers and migrants have been ratified?
  - 2. Political Risk Factors:**
    - a. Level of political instability or conflict
    - b. Level of crime and violence
    - c. Level of state persecution
    - d. Level of corruption
  - 3. Socio-economic Risk Factors:**
    - a. Presence and concentration of migrant workers
    - b. Presence of migrant workers from vulnerable countries
    - c. Level of national economic development
    - d. Level and extent of poverty
    - e. Degree of gender inequality
- Degree of landlessness and dispossession

## LABOR SUPPLY CHAIN MAPPING

Companies may already conduct some form of supply chain or traceability mapping as part of equipment procurement and contracting and to comply with safety regulations.

In addition to tracing the flow of materials and services throughout the operation (see RAT Base Tool 6), companies must map their **labor supply chain**. For companies that focus on providing janitorial, waste management and other facilities services to other companies, this is particularly important. In some cases, companies may hire their labor directly, but in many others, third-party labor recruiters are used that have their own complex chain of sub-recruiters as well as country agents in the countries of origin and destination.

The process of mapping a labor supply chain is similar to the process of mapping a supply chain beyond direct (first-tier) suppliers. First, a company should survey its first-tier suppliers to gather information about *their* suppliers. Then, these second-tier suppliers can be queried about their suppliers, and so on, to the bottom of the supply chain.

The types of actors typically found in facilities services labor supply chains include:

- Labor Recruiters who recruit, and sometimes manage, workers for companies
- Agents in the Countries of Origin who advertise available jobs and process jobseekers' applications
- Outsourced Labor/Staffing Agents who provide and manage workers for companies

Through the mapping process, companies can gain an understanding about the geography and structure of their labor supply chains, which can be used to inform risk assessment efforts. The process helps to answer the questions, who is employed throughout the company's operations, where are the workers coming from, and how are they recruited and hired? Answering these questions can help a company understand where human trafficking risks might occur.

Information can be gathered from:

- labor recruiter/agent self-assessments and self-reporting
- labor recruiter/agent interviews
- labor recruiter/agent site visits and audits (documents, records, observations and interviews)
- receipts and purchase orders

Table 1 is an example of information to gather for labor supply chain mapping.

**Table 1**

Information to Gather from Suppliers in Labor Supply Chain Mapping		
	Profile Information	Sources of potential risk
<b>Minimum recommended profile information</b>	<input type="checkbox"/> Supplier name	
	<input type="checkbox"/> Supplier headquarters address	Evaluate legal responsibilities for headquarters country as described in Tool 4
	<input type="checkbox"/> Location of supplier worksites (where supplier is performing work or providing services)	Evaluate risks relevant to <b>country of operation/host country</b> (see Tool 4)
	<input type="checkbox"/> Type of service provided by supplier	Evaluate human trafficking vulnerability tied to <b>type of work</b>
<b>Additional recommended profile information</b>	<input type="checkbox"/> Approximate number of workers hired directly by supplier	These are only workers hired and employed directly by the supplier, without the use of labor recruiters.
	<input type="checkbox"/> Approximate number of workers hired through labor recruiters or staffing agents (labor contractors)	<p>_____ hired with recruiter, employed by supplier          _____ hired and employed by recruiter/agent</p> <p>Use of <b>third-party labor recruiters or staffing agents</b> increases human trafficking risk overall in any given operation.</p> <p>Work sites with a relatively high proportion of contracted workers to directly hired workers should be prioritized. See Tools 7 and 9 for more information on screening and evaluating labor recruiters.</p>
	Types of jobs provided by supplier	Prioritize suppliers that provide, or worksites that have, relatively higher concentrations of <b>low-skilled, low-paid, hazardous or otherwise undesirable positions</b> .
	Presence of migrant workers (Y/N)	<b>Migrant workers</b> are particularly vulnerable to human trafficking in many contexts.
	Origin country of migrant workers and how they are recruited	Evaluate <b>risks relative to country of labor supply</b> . See <a href="https://www.responsiblesourcingtool.org/">https://www.responsiblesourcingtool.org/</a> for more information.

## POTENTIAL HUMAN TRAFFICKING RISK FACTORS IN FACILITIES SERVICES

As a service-based industry, facilities services delivery is by nature localized, and as described above, by far the most significant risk of human trafficking in the sector derives from the supply of labor.

Trafficking in Persons Risks Present in Facilities Services:

- Vulnerable, easily replaced and/or low-skilled workforce
- Presence of labor recruiters
- Migrant workforce and
- Hazardous/undesirable work

The majority of jobs in this sector are low-skilled and low-paid. The duties of **janitors** and building cleaners include gathering and emptying trash, cleaning building floors, cleaning and stocking restrooms, cleaning spills, washing windows and walls, and making minor repairs in buildings. **Laundry** workers inspect articles for stains, sort articles, load clothing into machines, add detergent and bleach to machines, sort and hang clothing, and clean and maintain laundry machines.

**Grounds maintenance** workers mow, edge, and fertilize lawns. They weed and mulch landscapes, trim hedges, shrubs, and small trees, remove dead, damaged, or unwanted trees, plant flowers, trees, and shrubs, and water lawns, landscapes, and gardens. The duties of **security guards** and surveillance officers include protecting and enforcing laws on an employer's property, monitoring alarms and closed-circuit TV cameras, controlling access for employees and visitors, conducting security checks over a specified area, writing reports on what they observed while on patrol, and detaining violators. **Waste collectors** collect and dump refuse or recyclable materials. Some collectors may be operating the vehicles, while others are strictly tasked with collection and disposal.

**Housekeepers** are typically employed suppliers serving residential facilities such as hotels, hospitals, military bases, and prisons. A major subset of housekeeping workers globally are household domestic workers, with the largest numbers employed in Latin America and the Caribbean and Asia and the Pacific, although rates of employment of servants were also high in the less densely populated Middle East. Most domestic workers are women, and the employment arrangements tend to be informal, with varied employment titles and arrangements. Many domestic workers are international migrants seeking employment opportunities in wealthier countries, moving both within

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regions such as Latin America and Southeast Asia, and from such regions to more prosperous countries in North America and Europe.

**Food service** workers are employed in cafeterias and canteens in office buildings and manufacturing sites, or as caterers, prepare food at their employer's facility and deliver and serve it at a customer's location.

Many positions within the facilities services sector are dangerous, and difficult. In laundry, employees work long hours, usually standing up, in hot and noisy environments, and the work may involve the use of harsh chemicals. Janitorial jobs require long hours of walking, standing, or bending and sometimes involve moving and lifting heavy supplies and equipment. Cleaners have high levels of musculoskeletal problems compared to other professions and they also are known to suffer from hand dermatitis caused by wearing gloves for long periods of time and working with harsh chemicals. Janitors may have to work night shifts as well, depending on the nature of the facility being cleaned, and are often not given enough time to complete their tasks, which adds an additional element of danger and stress. Landscaping and grounds maintenance work is very physically demanding and requires the use of dangerous equipment and the application of harsh chemicals, contributing to worker vulnerability to injury. Groundskeeping work is also highly seasonal and seasonal work is often associated with income instability for workers. Security guards work long hours standing or sitting, and by its nature their work has the potential to be very dangerous. Waste management employees lift heavy loads and work with unpleasant material. Many domestic workers are expected to work long hours and to be on call 24 hours per day. Female domestic workers and cleaners assigned to work at a customer's facility are vulnerable to sexual harassment and assault.

Jobs of these kinds typically require basic skills and minimal language competency, making them accessible to workers who may have few other options for formal employment, and may ultimately serve as a pathway to more desirable modes of employment for low-skilled women, international migrants, youth, and others at the margins of the formal workforce. Because of their marginality, however, such workers are often in a poor position to advocate for improved working conditions or employment terms for themselves, and are vulnerable to exploitation and abuse, including human trafficking.

Most of the tasks performed by janitors, housekeepers, laundry workers, groundskeepers, and security guards are considered low-skilled, and the jobs are

generally poorly paid. Workers who take on such jobs generally do so because they lack better employment alternatives, typically due to a combination of poverty and lack of skills. Because such jobs typically require little investment in workforce training on the part of employers, and because poor and low-skilled workers are often abundant in the populations supplying the labor for these industries, such workers are easily replaced and therefore poorly positioned to advocate for themselves in the face of exploitation or trafficking. Many workers in these industries are women, children, migrants, members of ethnic minorities, or members of other relatively disenfranchised groups. Such people often lack robust social and economic resources and may be dependent on their employers or employment agents not only their job security, but also their immigration status, housing, food, or other necessities.

Workers who lack legal immigration status may be particularly vulnerable to exploitation by employers or outsourcing agents, who may use the threat of arrest or deportation to enforce their labor.

Migrant workers in facilities services are more vulnerable to human trafficking for a number of reasons, including deceptive recruitment, lack of local support systems, lack of familiarity with the local culture or language, dependence on the job and employer due to migration-related debt, vulnerability to deportation due to immigration status, and constraints imposed by employers on their freedom to leave the workplace.

Migrants may also feel pressured to remain in coercive or abusive situations due to the dependence of their family members back home on their remittances.

In the United States, a large proportion of the workers in housekeeping industries are temporary migrants. Housekeeping and other facilities operation services for large international projects such as military or post-disaster recovery operations and major sporting events are often provided by migrant laborers who are hired by third-party labor recruiters or outsourcing agencies. Low-skilled positions in construction and transportation, as well as housekeeping positions for janitors, landscapers and groundskeepers, launderers, foodservice providers, and security personnel all need to be staffed quickly in such contexts. If insufficient numbers of appropriate workers are available locally, migrants are imported for such jobs, raising the risk of human trafficking.

Labor brokers, outsourcing agents, and other middlemen play a significant role in the supply of labor to facilities services sector. For migrants especially, the presence of

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middlemen opens workers to the possibilities of deception in recruitment regarding the types and terms of employment and recruitment, as well as job placement fees. These workers frequently must borrow money to obtain their jobs and earn less than expected, increasing their risk of debt bondage. Migrants are also vulnerable to having their passports retained by their agents or employers, severely restricting their ability to remove themselves from exploitative or abusive situations.

### **Assessing Risks of Individual Suppliers**

After a company has developed a working supply chain map, they should seek to gain insight into the actual practices of individual suppliers and the labor agents those suppliers engage; each of which can engage a heterogeneous group of workers. Each type of service and location of work has a different risk profile for workers. The following tools provide guidance on conducting these risks assessments:

1. Sample Supplier Self-Assessment Questionnaire (Tool 8)
2. Labor Agent Screening Tool (Tool 7)
3. Labor Agent Evaluation Tool (Tool 9)
4. Sample Migrant Worker Interview Tool (Tool 10)