



PROTECTIONS AGAINST TRAFFICKING IN PERSONS

Labor Supply Chain Mapping and Initial Risk Screening

As described in the RST [Base Tool 07A](#), 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 service industry as well. Companies can use labor supply chain mapping to better understand how security personnel are hired and the conditions of where they work.

This tool provides guidance on how companies, especially private security companies, can use supply chain mapping to prevent human trafficking among security personnel. The tool describes different types of labor supply chain scenarios common among the private security industry and shows how risk assessments can be conducted for each layer of actors in the labor supply chain. It also outlines risks associated with types of worksites that security personnel might be employed in. For a basic guide to supply chain mapping, please see RST [Base Tool 07A](#).

- For private security companies

In some cases, security companies 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, personnel are hired through labor recruiters or the company may subcontract to a secondary security company that itself uses labor recruiters who in turn use agents and sub-agents to hire workers. Each layer can reduce visibility into how security personnel are hired and increase risk.

- For companies that employ security personnel in their operations

When conducting supply chain mapping and risk screening as described in RST [Base Tool 07A](#), companies should be sure to include an assessment of any security personnel employed at each tier of operations; standards must be cascaded to security guards employed at factories, for example, just as they are to production

workers, and so insight onto how security guards are recruited, hired, and managed is important to gain as well.

By gaining information on how security personnel 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 and ultimately help prevent human trafficking among the security personnel they employ or that are employed by their suppliers, contractors, vendors (and their contractors, and so on).

INTRODUCTION TO 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, companies must map their **labor supply chain**. For companies that focus on providing security guard personnel as a service to other companies, this is particularly important. In some cases, companies may hire their labor directly, but in many others, they may use third-party labor recruiters who have their own complex chain of sub-recruiters as well as recruitment agents in workers' 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 contractors/suppliers to gather information about *their* contractors/suppliers. Then, these second-tier contractors/suppliers can be queried about their contractors, sub-contractors/suppliers, and so on, to the bottom of the supply chain.

The types of actors found in typical labor supply chains include:

- **Labor Recruiters or Suppliers** who recruit, and sometimes manage, workers for companies, including:
 - **Recruitment Agents in the countries of origin** who advertise available jobs and process jobseekers' applications
 - **Outsourced Labor Agents** who manage and sometimes recruit workers for companies

Labor Supply Chain Mapping and Initial Risk Screening

- **Subcontractors** who are companies themselves that may have their own chain of **actors**

Through the mapping process, companies can gain an understanding of 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 of 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:

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

See Table 1 for an example of recommended information to gather (in this case from a subcontractor) when conducting labor supply chain mapping. (For information on evaluating a subcontractor or supplier, see [Tool 6](#).)

Labor Supply Chain Mapping and Initial Risk Screening

Table 1

Information to Gather from Subcontractors in Labor Supply Chain Mapping Efforts		
Profile Information		Notes for Risk Assessment
Minimum recommended profile information	<input type="checkbox"/> Subcontractor name	
	<input type="checkbox"/> Subcontractor headquarters address	Evaluate legal responsibilities for Home State as defined by Montreux Document (See Tool 03)
	<input type="checkbox"/> Location of subcontractor worksites (where subcontractor is performing work or providing services)	Evaluate risks relevant to country of operation/destination country (see <i>Potential Risk Factors by Country In Private Security Labor Supply Chains</i> below and Tool 03)
	<input type="checkbox"/> Type of security service provided by subcontractor	Evaluate human trafficking vulnerability tied to type of work (see <i>Potential Human Trafficking Risk by Type of Security Worksite</i> below)
Additional recommended profile information	<input type="checkbox"/> Approximate number of workers employed directly by subcontractor	
	<input type="checkbox"/> Approximate number of workers hired through labor recruiters or other sub-contractors	Use of third-party labor recruiters or other sub-contractors increases human trafficking risk overall in any given operation (See <i>Potential Risk Factors by Type of Actor in Private Security Labor Supply Chains</i> below). Work sites with a relatively high proportion of sub-contracted workers to directly hired workers should be prioritized. See Tools 05 and 07 for more

Labor Supply Chain Mapping and Initial Risk Screening

		information on screening and evaluating labor recruiters.
	Types of jobs provided by subcontractor	Prioritize subcontractors providing, or worksites with, relatively higher concentrations of low-skilled, low-paid, hazardous or otherwise undesirable positions.
	Presence of migrant workers (Y/N)	Migrant workers are particularly vulnerable to human trafficking in many contexts.
	Origin country of migrant workers and how they are recruited	Evaluate risks relative to country of labor supply. See www.responsiblesourcingtool.org/understandrisk for more information.

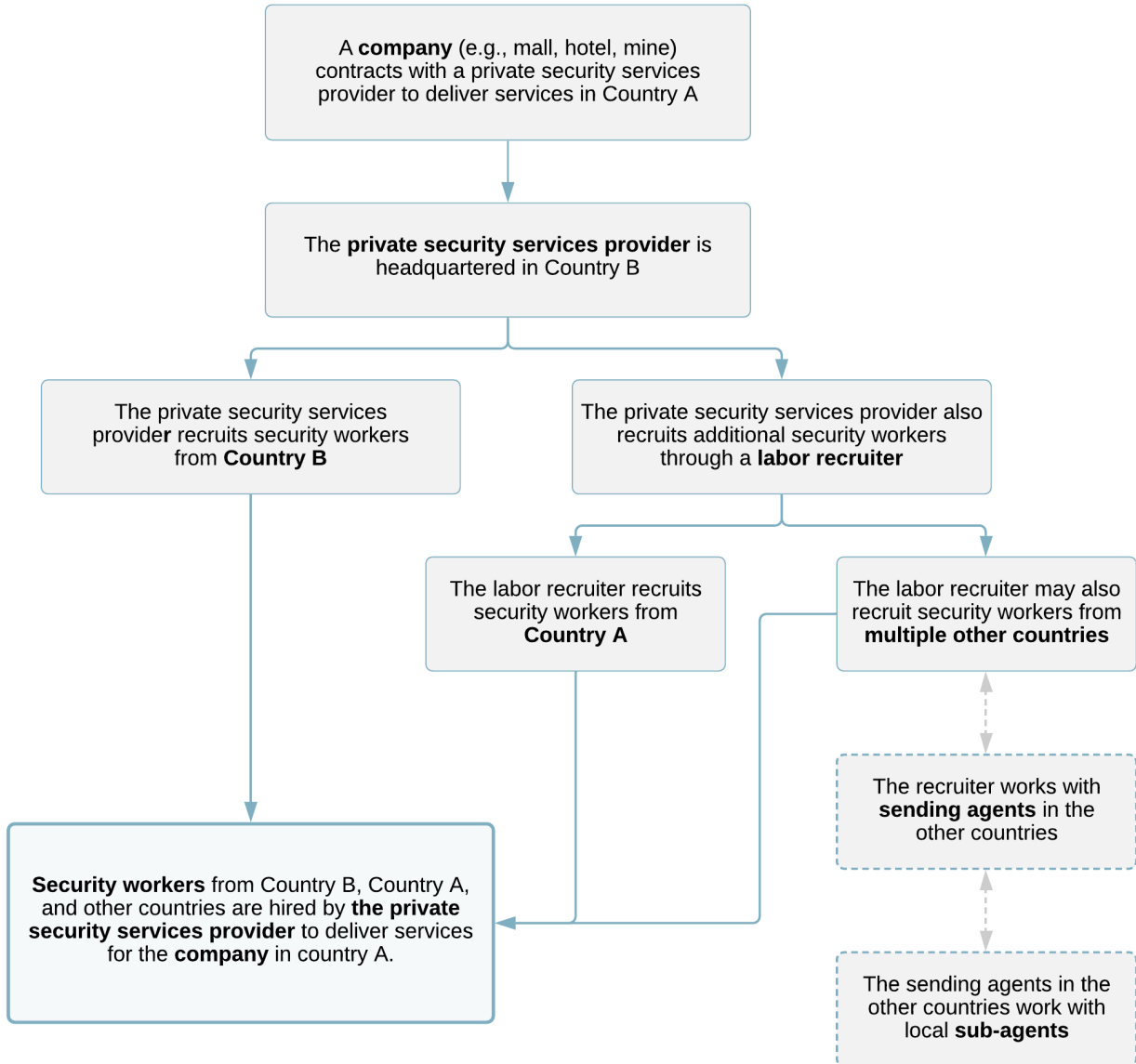
EXAMPLE LABOR SUPPLY CHAIN SCENARIOS

Visual representations can help to map supply chains in general, including labor supply chains. As information is gathered from each tier, it can be added to the map to ultimately create a comprehensive picture of the labor supply chain.

The private security industry operates in a variety of supply chains, and labor sourcing models can vary widely. Each model has different implications for risks to workers and related ethical risk to companies. Companies will need to assess the nature of their operations considering the specific type of security services provided, the geographic location of a mission or contract, and any subcontractors involved when conducting labor supply chain mapping and risk assessment.

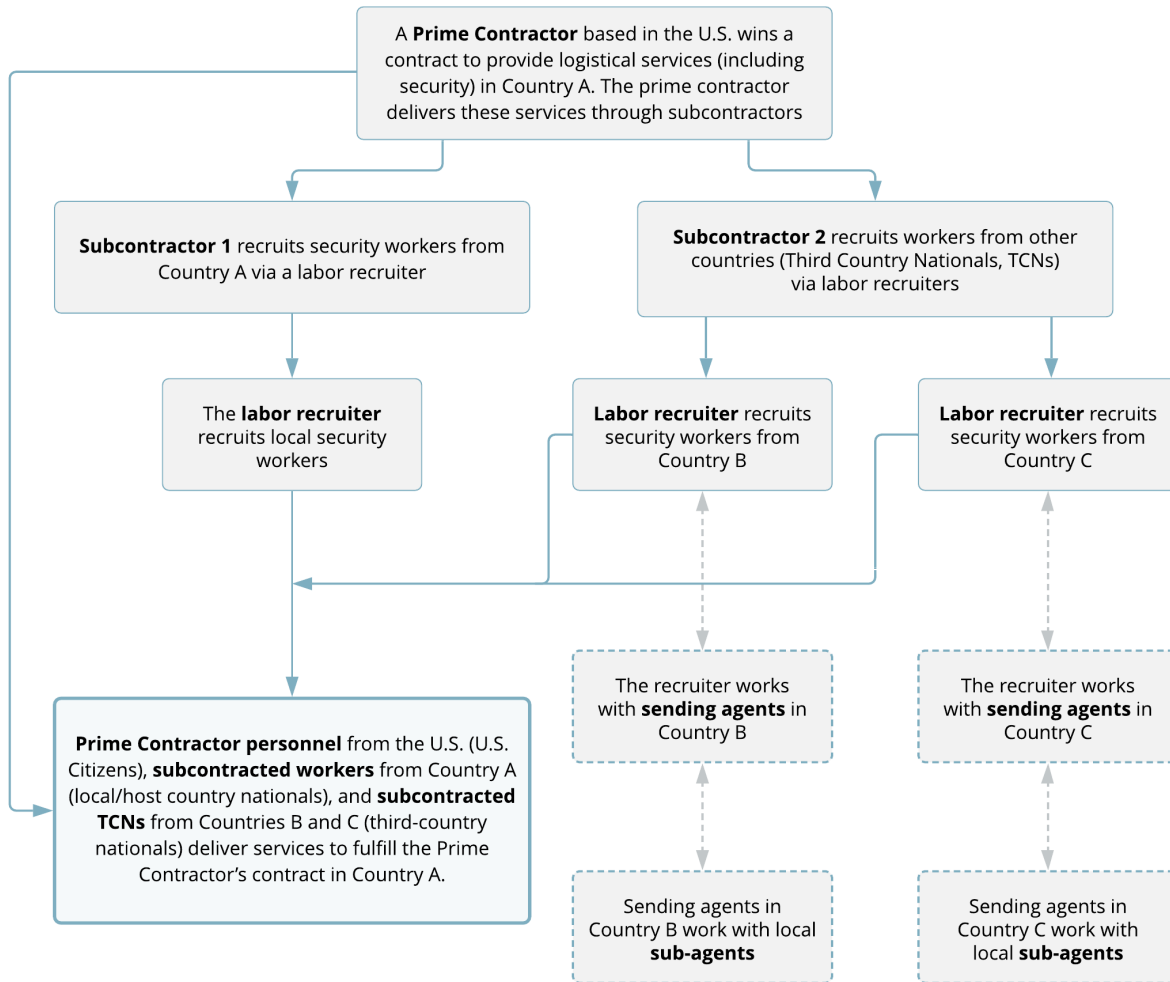
Labor Supply Chain Mapping and Initial Risk Screening

Example Scenario 1



Labor Supply Chain Mapping and Initial Risk Screening

Example Scenario 2:



Once the labor supply chain is mapped, companies can assess for a range of risk factors including country-based risk factors, recruitment-based risk factors, and risk factors based on the nature of work performed.

There are a variety of commercial and public resources available to assist with human trafficking risk assessment at the level of sector/industry and geographic location. The resources at www.responsiblesourcingtool.org/visualizerisk provide further insight into some of the risk factors listed below. For further explanation of why these factors have

bearing on human trafficking risk, please see:
www.responsiblesourcingtool.org/understandrisk.

POTENTIAL RISK FACTORS BY TYPE OF ACTOR IN PRIVATE SECURITY LABOR SUPPLY CHAINS

As with other sectors, security services are very commonly outsourced. Outsourcing in the security industry is unique, and potentially even more prevalent than in other sectors, for a few reasons:

- Outsourced/contracted security tends to be cheaper because the contracted security service company covers all costs.
- Contracted security services often handle recruitment of security personnel, allowing companies to address staffing problems “easily and quickly.”ⁱ (However, contracted security may have a higher rate of turnover than proprietary/in-house security.ⁱⁱ)
- In-house security is often more expensive and may be considered higher status work than outsourced security work; the business itself typically handles recruitment of guards for in-house security.ⁱⁱⁱ
- Outsourcing of security services is not only often significantly cheaper than in house security; it can be perceived as a means to reduce liability, including insurance claims.^{iv}

Facilities that outsource security services often utilize third-party providers for other staffing needs as well, but they often need to engage multiple providers to procure all staffing necessary for their operations. Manufacturing facilities, for example, may use different recruitment agencies to recruit security guards than those for general manufacturing workers.

Subcontractors: The use of subcontractors is a common form of outsourcing security services and can increase the opacity in labor supply chains and supply chains in general. Subcontractors increase the number of intermediaries between the worker

Labor Supply Chain Mapping and Initial Risk Screening

and the company benefiting from that labor. Subcontractors also often use labor recruiters themselves.

The use of subcontractors is particularly common among logistics providers. Prime contractors, those awarded direct contracts from the Pentagon, often utilize subcontractors for specific areas of product or service delivery. Subcontractors are often smaller multinational companies. For example, as of 2015, the leading recruiter of Ugandan security guards was the subcontractor Dreshak, a Pakistani company based in Dubai. Ecolog, a subcontractor used on U.S. government contracts in Afghanistan, is also a Dubai-based company.^v

Subcontracting and the practice of outsourcing the recruitment, hiring, and managing of workers, including security personnel, often offer strategic advantages for companies. However, subcontracting and outsourcing labor recruitment can in many cases reduce visibility into labor supply chains overall. See below for a list of recruitment-based risk factors associated with subcontracting and outsourcing.

Labor Recruiters: Labor recruiters may either be engaged directly by a company, by an outsourced service provider (potentially referred to as a prime contractor), or by a subcontractor. Labor intermediaries often provide valuable recruitment and migration facilitation services; they may recruit Third Country Nationals (TCNs) working through their own networks of local recruiters. However, there can be significant gaps in regulation, and exploitation and abuse of workers are widespread. Some workers are misinformed or even deceived as to the nature and/or conditions of the job they are ultimately placed in, and many pay substantial fees to cover their recruitment costs. The debt that often results from payment of recruitment fees is a major contributing factor to the vulnerability of workers to human trafficking, as workers are forced to continue working, sometimes for a year or more, in order to pay off the debt they incurred to get their jobs. Indebted workers have few options and little leverage to advocate for themselves in the workplace, making them vulnerable to other elements of human trafficking as well. Vulnerability is particularly elevated when workers experience multiple dependencies on their brokers or employment agents for their wages, visas, work permits, and/or housing.

There is significant evidence of deceptive recruitment and contract substitution for personnel in the private security sector, particularly those hired via third-party recruiters. A review of recent cases provides some illustrative examples of the types of

deception concerning hours, wages, nature of work, and location of work that have occurred, including:

- Documented evidence of **contract substitution** among security guards working in a Qatar hotel: Workers were provided new contracts at the airport hours before departure that changed the terms of the job and salary. Upon arrival, security guards reported working 50 percent more hours than originally agreed upon.^{vi}
- Documented evidence of **discrepancies between promised and actual wages** among security guards working in Malaysia: Nepali security guards working in Malaysia report being promised wages of USD 1,250 (plus overtime), but in reality received wages of USD 546 (plus overtime).^{vii}
- Documented evidence of **deception regarding nature/location of work** among security guards: Trained engineers from Kenya were promised jobs on construction sites in Doha but ultimately ended up working as security guards.^{viii} According to an ACLU and Yale Law School report, "Victims of Complacency: The Ongoing Trafficking and Abuse of Third Country Nationals by U.S. Government Contractors," it was documented that recruiters lied to migrant workers about their destination "often promising jobs in Kuwait or the U.A.E. and instead taking workers to Iraq."^{ix} This strategy is reportedly likely to be used when labor sending countries ban recruitment to particular countries.

Case Study on Deceptive Recruitment Linked to Subcontracting on U.S. Military Basis

A 2014 Al Jazeera investigative report on TCNs on U.S. Military bases found **evidence of recruitment fees and deceptive recruitment within subcontracting arrangements**. Al Jazeera found that workers had paid USD 4,000 in recruitment fees and received a monthly salary of USD 750. According to a worker interviewed, "Everyone pays." Recruiters interviewed explained that they advertised jobs with the prime contractor with a monthly salary of USD 1,200, however those jobs did not actually exist. Workers are recruited and sent to Dubai for non-existent jobs. When they arrive in Dubai, they are housed in workcamps (sometimes for multiple weeks) and then told that for an additional fee they can work for a subcontractor (who is providing labor to the prime contractor). In one example, a worker took this offer and ended up with a monthly salary of only USD 500. According to the Al Jazeera report,

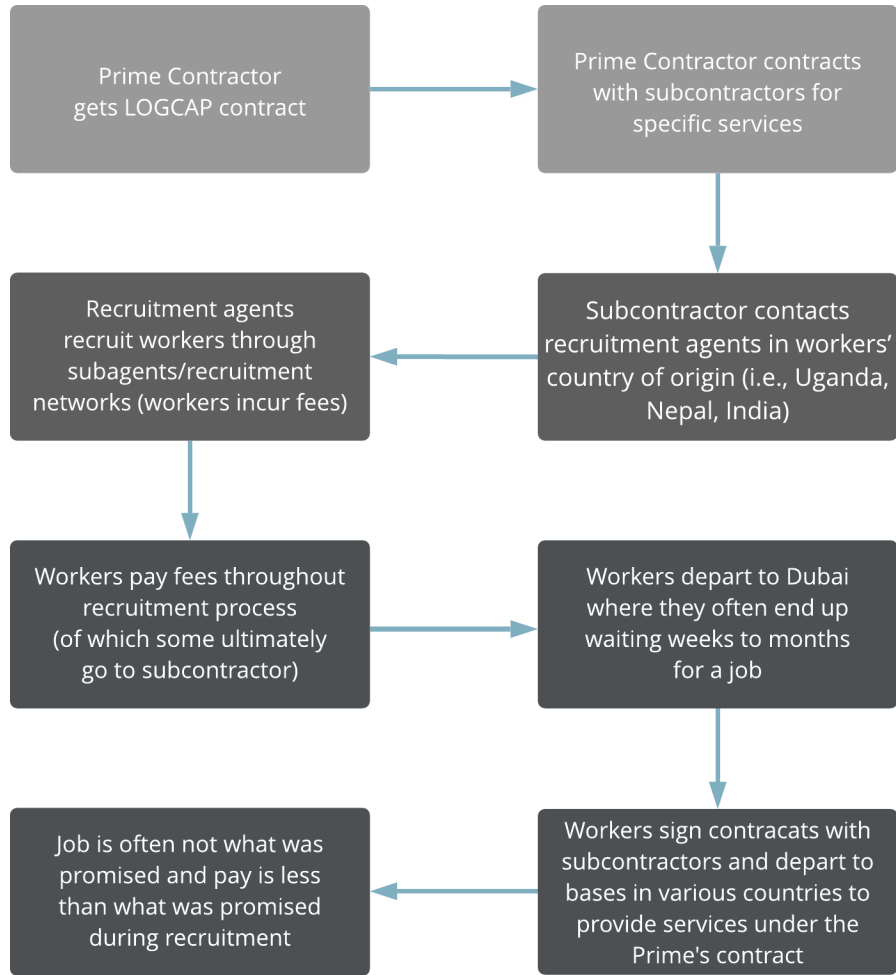
Labor Supply Chain Mapping and Initial Risk Screening

Dubai is a central transit point for TCNs, and subcontractors frequently dip into the pool of waiting laborers that collects there. The report also found evidence of subcontractors and recruiters creating false agreements for show that indicate the subcontractor pays the recruiter a per worker fee even though the recruiter is actually only paid by the workers.

Al Jazeera America. Fault Lines, America's War Workers. Sep 26, 2015. Originally from 2014.
<https://www.youtube.com/watch?v=tEovFBU7V9Q> and <http://america.aljazeera.com/articles/2014/3/7/after-12-years-ofwarlaborabusesrampantonusbasesinafghanistan.html>

The contracting of TCNs via a subcontractor's use of labor recruiters, as described in the case study above, can be visually represented as follows:

Labor Supply Chain Mapping and Initial Risk Screening



POTENTIAL RISK FACTORS BY COUNTRY IN PRIVATE SECURITY 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 security personnel. After mapping operations in [Tool 3](#), ensure risks are assessed separately for Contracting State, Territorial State, and Home State, as relevant. Where migrant workers are present in significant numbers, an assessment of labor sending countries can help illustrate potential trafficking risks for migrant workers in the recruitment phase. Clients of private security services should also know that some outsourced security providers require security personnel to be hired from a limited list of countries, presenting a potential risk of discrimination.

- 1. Legal/Policy Risk Factors** (see [Tool 03](#) for more information on legal and policy risk):
 - a) What level of legal protection for civil liberties and 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
 - f) Degree of landlessness and dispossession

POTENTIAL HUMAN TRAFFICKING RISK BY TYPE OF SECURITY WORKSITE

To understand human trafficking and other labor risks at the level of service delivery, it is important to understand the nature of worksites and types of services that workers perform. Worksites and particular job functions can pose different risks for workers. Some, but not all, types of security services are included under the Facilities Services industry, which also includes janitorial, landscaping, waste management, and housekeeping services. Characteristics of this industry include jobs that are labor-intensive and associated with the basic operation and maintenance of facilities. The majority of jobs in this sector are also low-paid, and many positions within the facilities services sector are classic examples of “3D” jobs — dirty, dangerous, and difficult. Facilities operation services, including security services for large international projects such as military or post-disaster recovery operations, often need to be staffed quickly. If sufficient numbers of appropriate workers are unavailable locally, migrants are often hired for such jobs by third-party labor recruiters or outsourcing agencies, raising the risk of human trafficking.

Migrant workers often lack robust social and economic resources and may be dependent on their employers or employment agents not only for 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. 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, and are vulnerable to having their passports retained by their agents or employers, severely restricting their ability to remove themselves from exploitative or abusive situations.

Labor brokers, outsourcing agents, and other middlemen play a significant role in the supply of labor to the facilities services sector. For migrants especially, the presence of middlemen opens workers to the possibilities of deception in recruitment regarding the types and terms of employment, recruitment, and job placement fees. These workers frequently have to borrow money to obtain their jobs and earn less than expected, increasing their risk of debt bondage.

Overall, the most significant risk of human trafficking in the sector derives from the supply of labor. Trafficking in persons risks present in Facilities Services can include a vulnerable, easily replaced and/or low-skilled workforce, the presence of labor recruiters, a migrant workforce and hazardous work.

Risk by Type of Worksite and Context

The duties of security guards and surveillance officers in general 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, interviewing witnesses for court testimony, and detaining violators. Security guards work long hours standing or sitting, and by nature, the work has the potential to be very dangerous.

The following tables present risk considerations for different types of security services performed in different contexts.

Security Services Performed on Military Bases: ^x	
Types of tasks:	Trafficking in Persons Risks:
<ul style="list-style-type: none"> • Protecting fixed locations • Guarding traveling convoys • Providing security escorts • Training police and military personnel • Security support activities include: <ul style="list-style-type: none"> ○ Static security to protect military bases, housing areas, reconstruction work sites ○ Personal security and protection ○ Convoy security ○ Security for internment operations 	<ul style="list-style-type: none"> • Security guards are often provided by subcontractors who in turn use labor recruiters • Security guards and other facilities services providers are often migrant workers (third country nationals) • Hazardous work • Lower ranking work (security guards are often lower on the military base hierarchy)

Labor Supply Chain Mapping and Initial Risk Screening

Commercial Security Services at Institutions Like Malls, Hotels, Banks, Factories ^{xi}	
Types of tasks:	Trafficking in Persons Risks:
<ul style="list-style-type: none"> • Preventing criminal activity • Maintaining order (crowd control) • Patrolling the property • Monitoring surveillance equipment • Promoting safety • Writing reports • Providing customer service • Emergency response • Performing security checks • Controlling access to establishment 	<ul style="list-style-type: none"> • Security guards are often provided by outsourced companies who may use labor recruiters • Security guards are often migrant workers • Potentially hazardous work • Potential for loss of work and wages if the employing outsourced company does not have enough clients

Security Services at Mines and Extractive Sites ^{xii}	
Types of tasks:	Trafficking in Persons Risks:
<ul style="list-style-type: none"> • Protecting and safeguarding mine site and employees • Securing company assets • Monitoring and recording entry and exit of individuals to and from site 	<ul style="list-style-type: none"> • Presence of labor recruiters • Potentially remote location • Potentially hazardous work

Security Services at Construction Sites ^{xiii}	
Types of tasks:	Trafficking in Persons Risks:
<ul style="list-style-type: none"> • Securing site and prevent trespassing • Ensuring safety of workers, site, and materials on site • Acting as emergency response team 	<ul style="list-style-type: none"> • Presence of labor recruiters • Often migrant workers • Potentially hazardous work • Potential for delayed payment of wages if hired through chain of subcontractors

Special Consideration: COVID-19 and Security Personnel

The global COVID-19 pandemic has resulted in changing roles for many security guards around the world. In some cases, security guards have had to take on additional tasks related to the pandemic, including taking patrons'/workers' temperatures, distributing hand sanitizer, and enforcing social distancing, and monitoring crowd control. There has also been an increased presence of security personnel in healthcare settings.^{xiv} Early on in the pandemic, male security guards in the UK were found to have the highest risk of death from COVID-19.^{xv} Health risks associated with performing security services during the pandemic can make security industry work even more hazardous, and potentially undesirable; these factors increase the likelihood that the work will be performed by vulnerable populations.

ASSESSING RISKS OF INDIVIDUAL SUPPLIERS

After a company has developed a working supply chain map and assessed for various risk factors, they should seek to gain insight into the actual practices of individual labor recruiters, subcontractors, and the labor recruiters those subcontractors engage. The following tools provide guidance on conducting these risks assessments:

1. Labor Recruiter Screening Tool ([Tool 5](#))
2. Sample Supplier Self-Assessment Questionnaire ([Tool 06](#))
3. Labor Recruiter Monitoring Tool ([Tool 07](#))
4. Migrant Worker Interview Tool ([Tool 08](#))

ENDNOTES

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