



Human Trafficking and Other Labor Risks in the Construction Sector

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Verité

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1. Introduction

1.1 Objective

Construction is one of the most physically hazardous industries for workers as well as one of the primary sectors in which workers are highly vulnerable to human trafficking, including forced labor.¹ Migrant workers,² who often work informally, make up a significant proportion of the workforce on construction sites around the world and are at particularly high risk of labor exploitation and situations that may result in forced labor. This report provides an overview of these risks in the sector globally, including in the United States. In some cases, the report also discusses other serious labor abuses as indicators of conditions or practices in the working environment that contribute to workers' vulnerability to forced labor.

The objective of the report is to raise awareness of the forms that forced labor may take in the construction sector, its structural causes, and the combination of factors that may bind workers to their jobs. The intended audience for these findings includes government and industry actors seeking to strengthen their human rights due diligence approaches to manage the risks of forced labor, as well as workers and their advocates, civil society, and consumers.

Construction sector entities operate within an increasingly stringent regulatory environment that demands proactive measures to prevent human trafficking. Federal legislation such as the Trafficking Victims Protection Act, the Tariff Act of 1930, the Trade Facilitation and Trade Enforcement Act of 2015, the Countering America's Adversaries through Sanctions Act, and the Uyghur Forced Labor Prevention Act, as well as relevant regulations like the Federal Acquisition Regulation and various state-level

¹ [Barrick, Kelle et al. "Risk and Protective Factors for Experiencing Labor Trafficking and Other Labor Abuse in the Construction Industry." Human Trafficking Policy & Research Analyses Project. Sept 2024.](#)

Note: The United States recognizes two primary forms of trafficking in persons: forced labor and sex trafficking. For the purposes of this report, several terms are used such as "trafficking in persons," "human trafficking," and "forced labor." In this report, these terms refer to a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor.

² In this report, the term migrant worker refers to a person who migrates, or has migrated, from one country to another, with a view to being employed by someone other than him/herself, including any person regularly admitted, as a migrant for employment, and/or to seek temporary or permanent residence in another country. This definition is aligned with [ILO Convention C097 – Migration for Employment Convention \(Revised\), 1949](#) and the [U.S. Department of Homeland Security's Office of Homeland Security Statistics](#).

requirements, establish clear expectations for businesses to monitor and address trafficking risks within their operations and supply chains.

Construction sector entities also face compelling business reasons to implement robust due diligence systems. The reputational damage from association with trafficking operations can result in immediate loss of contracts, particularly with government agencies and major corporations that have adopted zero-tolerance policies. Furthermore, the operational disruptions caused by trafficking-related investigations can significantly impact service delivery and customer relationships, while the financial costs of remediation and legal proceedings can be substantial.

While forced labor risks exist across the construction sector's diverse operations and materials supply chains, the focus of this report is on labor supply chains and the work done on construction sites by outsourced, subcontracted, and otherwise vulnerable workers. Guiding frameworks used to benchmark practices and conditions in this sector, include, but are not limited to:

- [ILO Convention 29 – Forced Labour Convention, 1930](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [The International Labor Association's \(ILO\) Safety and Health in Construction Convention, 1988 \(No. 167\)](#)
- [The ILO's Safety and Health in Construction Code](#)
- [Design for Freedom Toolkit](#)
- [Responsible Sourcing Tool's Construction Sector Toolset](#)
- [Building Responsibly's Worker Welfare Principles](#)

1.2 Scope

This report covers the recruitment, contracting, and management of labor, including day laborers, subcontracted workers, and workers who perform specific services (e.g., masons, drywallers, heavy equipment operators, roofers) involved with construction sites. For information on the human trafficking risks associated with particular construction materials and supply chains, see the [Forestry](#) sector report and the following commodity reports: [Aluminum](#), [Bricks](#), [Copper](#), [Granite and Other Stone](#), [Gravel and Crushed Stone](#), and [Steel](#).

Workers in focus include unskilled construction laborers, workers supporting tradesmen (e.g. plasterers, stucco masons, drywall/ceiling tile installers, roofers, painters, and carpet, floor, and tile installers),

ironworkers, scaffolders, and pipefitters. Forced labor is a risk faced by any worker with one or more of the vulnerabilities discussed in this report and is prevalent in the construction sector around the world, including the United States. Attention is given to research indicating acute vulnerabilities faced by migrant, seasonal, and subcontracted workers (workers who are supplied by third party providers), who are often exposed to deceptive recruitment, debt bondage, excessive working hours, retention of identity documents, and unsafe working and living conditions.

1.3 Context and Methodology

1.3.1 Risk Factors, Risk Indicators, and Analytical Framework

The construction sector includes many different types of jobs ranging from those that are highly skilled and highly compensated to low skilled and low paid. As is the case across most industries, certain workers are more vulnerable to forced labor risks than others. This is based mainly on their ability to decline or leave a job in order to protect their welfare. Verité’s research has found that the greatest risk of forced labor is at the intersection of worker vulnerability and employment practices, including recruitment, that exploit that vulnerability. There are often overlapping characteristics of work and workers at this intersection, such as those in low-paid, low-skilled, dirty, dangerous, and demeaning (“Three D”) jobs; subcontract workers and workers hired by third-party intermediaries; migrant workers; workers compelled by severe economic drivers; and workers subject to coercion by the state. This report examines both socio-demographic and employment practice-related *risk factors*, which contribute to worker vulnerability, and *risk indicators* or signs, which help identify cases of forced labor. Risk factors and risk indicators have overlapping elements and causes. To help contextualize the many indicators highlighted by the research, Section 3 organizes them into the four most common **risk factors** that underlie them:

- The involvement of labor contractors, recruiters, agents, or other middlemen in the labor supply chain
- Workers experiencing precarious residency status (including migrant workers)
- Workers experiencing precarious employment and hazardous and undesirable work
- Workers experiencing poverty, marginalization,³ and absence of alternative income options

³ The [ILO Global Guidelines on the Prevention of Forced Labour Through Lifelong Learning and Skills Development Approaches](#) notes that people most at risk of forced labor are those that are vulnerable and includes marginalization among the common

Research for this report identified and discusses the following **indicators** of forced labor in the construction sector:⁴

- Deceptive or fraudulent recruitment (regarding the nature and terms of the job and/or the working and living conditions)
- Debt linked to recruitment practices
- Hazardous or degrading working conditions
- Onerous working hours or work schedule
- Degrading work-related living conditions
- Inability to terminate employment
- Physical violence
- Abuse of isolation
- Restrictions on workers' movement
- Retention of workers' personal documents
- Withholding of wages
- Abuse or manipulation of debt
- Abuse of vulnerability

1.3.2 Sources of Information and Criteria for Inclusion

Sources of information used for this report include a broad range of publicly available sources, such as civil society publications, journalistic investigations, academic research, and government reporting.

These sources were used to identify documented or credible allegations of labor exploitation across construction sector operations. We note that the absence of documentation (e.g., research or investigative reports) pertaining to certain geographic locations or types of construction businesses does

characteristics of vulnerability, along with suffering discrimination on the grounds of age, ethnicity, disability, gender, migration status, race, religion, or sex, etc. leading to social and economic exclusion or marginalization.

⁴ The ILO Forced Labour Convention, 1930 (No.29), defines forced labor as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” To support front line actors in the identification of situations of forced labor, ILO Indicators of Forced Labor - 2025 Revised Addition includes 11 of the most common signs observed in forced labor cases. They comprise situations that qualify as the menace of any penalty (also called coercion) and the absence of voluntary consent, or the ability to withdraw that consent, in other words the workers' freedom to leave the job. (To meet the threshold of forced labor, a situation must have some *combination* of these two types of abuse.) The 11 indicators do not map exactly to the ILO's earlier, more granular 2024 *Hard to See, Harder to Count: Handbook on Forced Labour Surveys*, which describes 22 circumstances commonly giving rise to involuntary work or qualify as forms of coercion. The list of indicators here are drawn from both these ILO documents as well as Verité' research for this report.

not signify low or the absence of risk and conversely, more available information on locations does not necessarily mean the risk is higher.

Further, allegations were not required to meet a legal or prosecutorial threshold to be included in the analysis, and not all findings presented here meet the legal definition of human trafficking. Labor exploitation occurs along a continuum, from fair, safe, and legal work, in which employment is freely chosen, to situations characterized by a combination of involuntariness and coercion.⁵

2. Overview of the Construction Sector

2.1 Background

The construction sector covers a wide variety of economic activity, including the building, maintenance, demolition, renovation, and repair of structures including houses, industrial facilities, airports, roads, bridges, and stadiums.⁶ Many of the building materials and tools used on construction sites are the products of complex international supply chains,⁷ including lumber, stone, metals, flooring, carpet, roofing, copper, corrugated and galvanized steel, solar tiles, electrical wiring, and plumbing components (e.g., polyvinyl chloride).⁸ As noted above, building material and tool supply chains are not covered in this report, but information relevant to these supply chains is available in other [Responsible Sourcing Tool reports](#). Within the sector, major subsectors include **construction of buildings** (e.g., residential buildings and single-family housing), **heavy and civil engineering construction** (e.g., utility systems, water and sewer lines, and water and sewer line related structures), and **specialty trade contractor projects** (e.g., foundation, structure, building interior and exterior, and roofing and poured concrete contractors).⁹ The sector involves a spectrum ranging from small-scale, local construction projects (such

⁵ For operational forced labor indicators of involuntariness and coercion developed by the ILO, please refer to the International Labour Organization's [Hard to See, Harder to Count: Handbook on Forced Labour Surveys](#) (2024). The presence of an indicator alone does not necessarily confirm a legal finding of forced labor but signals elevated risk, especially when multiple indicators are present simultaneously.

⁶ [International Labour Organization \(ILO\). *Construction: a hazardous work*. 2009.](#)

⁷ [Trubiano, Franca. "Forced labor, Urban Migration, and the Built Environment." *Design for Freedom, Grace Farms*.](#)

⁸ ["Different Types of Building Materials and Their Uses." Team Tradify, 7 Jan 2025.](#)

⁹ ["The Construction Chart Book: The U.S. Construction Industry and Its Workers, Seventh Edition." The Center for Construction Research and Training, Sept 2025.](#)

as a home remodel) to larger, national and international firms that construct large-scale projects (such as a sports stadium or international airport); labor exploitation is present across this spectrum.¹⁰

Construction is one of the largest industrial sectors in the world, accounting for 13 percent of global GDP.¹¹ Globally, migrant workers, who travel to and work in a country other than their own for the duration of a work contract, make up a large portion of the construction workforce.¹² Both regular (legal) and irregular (illegal) migrant construction workers¹³ are particularly vulnerable to exploitation in the sector, as discussed further in sections 3.1 and 3.2 below. Immigrants,¹⁴ especially those without proof of legal right to work or work authorization—whether legally or illegally present in a country—commonly find employment in the construction sector, where a steady need for short-term labor and labor shortages drive less scrutiny in hiring. Contractors also sometimes hire workers without proof of legal right to work or work authorization at cheaper rates than authorized workers via intermediary labor brokers to keep project costs down.¹⁵

In the United States, construction contributed 3.7 percent to GDP (USD 836 billion) in 2023, and in 2024 the sector employed 12.6 million people.¹⁶ Construction employment has continued to grow in the

¹⁰ [Johnson, Thomas. "Contractors take on modern slavery in their supply chains." *New Civil Engineer*, 23 Feb 2024.](#)

¹¹ ["The next normal in construction: How disruption is reshaping the world's largest ecosystem." McKinsey & Company, Jun 2020.](#)

¹² [Sharma, Anisha et al. "Understanding the Impact of Low-Cost Loans on Forced Labor." *National Bureau of Economic Research Working Paper Series*, Sept 2024.](#)

[Kinkoh, Hubert. "Understanding the Drivers and Impacts of Sub-Saharan Africa Labor Migration to the GCC." *Gulf Research Center*, 12 Jun 2025.](#)

¹³ According to the [IOM Migration Glossary](#), irregular migration refers to the movement of persons that takes place outside the laws, regulations, or international agreements governing the entry into the destination or exit from the State of origin, transit or destination. The U.S. government designates such irregular migrants as "illegal migrants."

¹⁴ According to the [United Nations Department of Economic and Social Affairs and IOM](#), an immigrant is a person who moves into a country other than that of his or her nationality or usual residence, so that the country of destination effectively becomes his or her new country of usual residence.

¹⁵ [Neuman, Scott. "ICE is sending a chill through the construction industry." *NPR*, 6 Nov 2025.](#)

[Caeron, Grant. "Undocumented construction workers essential to building America: Reports." *Daily Commercial News by Construct Connect*, 7 Jan 2025.](#)

["Immigrant Construction Workers in the United States." *National Immigration Forum*, 12 Sept 2024.](#)

[Bridges, C.A. "With ICE raids increasing, why are construction companies still hiring immigrants?" *Tallahassee Democrat*, 30 May 2025.](#)

¹⁶ ["The Construction Chart Book: The U.S. Construction Industry and Its Workers, Seventh Edition." *The Center for Construction Research and Training*, Sept 2025.](#)

United States, particularly in some of the most common occupations, such as laborers and managers.¹⁷ However, the sector faces labor shortages overall, and demand for skilled and experienced workers exceeds supply.¹⁸ Approximately one in four construction workers in the United States are foreign born,¹⁹ and Hispanic workers represent almost a third of the workforce.²⁰

One of the key features of the construction sector is the prevalence of subcontracting arrangements to execute both small and large projects, as construction projects typically involve multiple phases of work that each require different skills, workers, and schedules. General contractors, specialized contractors, and material suppliers often engage in multiple layers of subcontracting to supply projects with materials, specialized services (e.g., design and engineering), and labor.²¹ Contractors commonly hire subcontractors to recruit, hire, and pay workers—while supervising their day-to-day work on construction sites themselves—in locations where finding local workers is difficult.²² One of the results of pervasive subcontracting for the construction industry is an obfuscation of who a worker’s actual employer is and who is responsible for workers’ safety.²³ The challenges that subcontracting present for human rights due diligence and oversight of labor conditions more generally in the construction sector are further discussed in Section 3.1 below.

There is a low rate of directly hired employees in the construction sector, with high rates of self-employment and use of temporary workers. In 2021, roughly three out of four construction businesses (a total of 2.8 million businesses) were considered “non-employer” in the United States, meaning they

¹⁷ [“The Construction Chart Book: The U.S. Construction Industry and Its Workers, Seventh Edition.” The Center for Construction Research and Training, Sept 2025.](#)

¹⁸ [“U.S. Commercial Construction Outlook: Risks and Opportunities.” QBE Insurance.](#)

[Abdulhafedh, Azad. “The US Labor Shortage in Construction Industry – An Overview.” *International Journal of Management and Commerce Innovations* 11:2. 27 Dec 2023.](#)

[Hovnanian, Garo et al. “Bridging the Labor Mismatch in US Construction.” McKinsey & Company, 28 Mar 2022.](#)

¹⁹ Note that the term “foreign born” is no indication of citizenship status, only of birthplace. [Gallagher, Claire McAnaw. “The Construction Industry: Characteristics of the Employed, 2003-2020.” U.S. Bureau of Labor Statistics, Apr 2022.](#)

²⁰ [“The Construction Chart Book: The U.S. Construction Industry and Its Workers, Seventh Edition.” The Center for Construction Research and Training, Sept 2025.](#)

²¹ [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

²² [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

[“Sector Portal: Construction.” International Labor Organization.](#)

²³ [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

are owned and operated by a single individual with no payroll or paid employees. These firms work either as freelance individual contractors or are reliant on subcontractors for additional labor. Of the construction companies with multiple employees, about 82 percent employed fewer than 10 workers.²⁴

The construction sector is also fundamentally project-based, which results in labor being brought in on a flexible, per-job, temporary basis rather than steadily employed. The demand for different types of labor and skill fluctuates depending on the specific project and customer requirements, seasonality, and overall economy of a geographic region, which may accelerate or hinder project starts.²⁵ The short-term nature of projects and dynamic of workers being brought in from other regions to address local labor shortages can make it hard for workers to build connections that form the cohesiveness needed for joint actions such as a group raising issues with their employer or collective bargaining.²⁶ The short term nature of work, coupled with a workforce largely comprising workers who are entrenched in a relationship of dependence on their employer, who may not be fluent in the local language, and/or who may be shouldering recruitment and/or migration related debt can also disincentivize workplace safety practices such as training, equipment safety, and adherence to local labor laws.²⁷ Because of the common practice in the sector of providing “payment upon completion” of projects, withholding workers’ wages until the entire project is complete is quite common; it can take months for final payments to trickle down through the layers of subcontractors to reach the workers at the bottom.²⁸

²⁴ [“The Construction Chart Book: The U.S. Construction Industry and Its Workers, Seventh Edition.” The Center for Construction Research and Training, Sept 2025.](#)

²⁵ [“The next normal in construction: How disruption is reshaping the world’s largest ecosystem.” McKinsey & Company, Jun 2020.](#)

²⁶ [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

²⁶ [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

²⁷ [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

²⁸ [Halegua, Aaron. “Forced Labor in the U.S. Construction Industry.” *The Historical Roots of Human Trafficking*. Springer International Publishing, 2021.](#)

2.2 Processes and Jobs

Much of the construction sector workforce is temporary, as noted above, and performs manual labor.²⁹ The wide range of types of work in the sector result in a hierarchy of labor with infrastructure work (e.g. refurbishing bridges under government contracts) at the top, followed by commercial contractors and residential contractors. The lower rungs are occupied by trades such as plasterers and stucco masons, drywall and ceiling tile installers, roofers, painters, and flooring installers, many of whom—on average 47 percent—are immigrant or migrant workers.³⁰

Laborers—a category of unskilled workers that supports the higher skilled tradesmen—make up the largest occupation within the sector, with 892,690 employed in the United States as of 2024.³¹ Construction laborers perform tasks that support the work of more highly skilled workers, such as cleaning work areas and equipment, transporting tools on site, digging, and carrying materials.³² These unskilled workers, especially migrant and some immigrant workers, can be vulnerable to exploitation, including trafficking, because—as discussed in greater detail below—they are often easily replaced, driven by financial need, and may experience precarious legal status. The result is a lack of the security or leverage that allows for self-advocacy or self-protection, and often no choice but to endure abusive/exploitive conditions.

3. Forced Labor and Other Labor Rights Risk Factors Associated with Construction

Forced labor and vulnerability to forced labor in the construction industry have been documented throughout the world. The United States Department of State's *2025 Trafficking in Persons* report noted evidence of forced labor (or risk of forced labor)³³ in the construction sector in the following 136

²⁹ ["The next normal in construction: How disruption is reshaping the world's largest ecosystem." McKinsey & Company, Jun 2020.](#)

³⁰ [Siniavskaia, Natalia. "States and Construction Trades Most Reliant on Immigrant Workers, 2021." National Association of Home Builders, Eye on Housing, 6 Apr 2023.](#)

[Neuman, Scott. "ICE is sending a chill through the construction industry." NPR, 6 Nov 2025.](#)

³¹ [US Department of Labor, Bureau of Labor Statistics. *Industries at a Glance: Construction*.](#)

³² [U.S. Bureau of Labor Statistics. "Occupational Outlook Handbook: Construction Laborers and Helpers." 28 Aug 2025.](#)

³³ Risk of, or vulnerability to, forced labor in the construction sector, as opposed to documented evidence of forced labor, is indicated by the inclusion of "(risk)" following the country in which the risk or vulnerability was reported.

countries: Afghanistan; Albania; Algeria; Angola; Antigua and Barbuda (risk); Armenia (risk); Aruba; Australia; Austria; Bahrain; Bangladesh (risk); Barbados (risk); Belarus (risk); Belgium,; Belize (risk); Benin; Bhutan; Brazil; Brunei (risk); Bulgaria; Burma; Burundi; Cabo Verde; Cambodia; Canada; Chile; China; Croatia; Cuba; Curacao; Cyprus; Czech Republic; Cote d'Ivoire; Democratic Republic of the Congo (risk); Denmark; Djibouti; Dominican Republic; Egypt; El Salvador; Equatorial Guinea (risk); Eritrea (risk); Estonia (risk); Ethiopia; Fiji; Finland (risk); France; Georgia (risk); Germany; Guinea; Haiti; Honduras (risk); Hong Kong; Hungary; Iceland (risk); India; Indonesia; Iran; Iraq; Israel, the West Bank and Gaza; Italy; Japan; Jordan (risk); Kazakhstan; Kenya (risk); Kuwait; Kyrgyz Republic; Laos (risk); Latvia (risk); Lebanon; Lesotho (risk); Libya; Lithuania (risk); Luxembourg; Macau (risk); Malaysia; Maldives; Malta (risk); Marshall Islands; Mauritania (risk); Mauritius; Mexico; Micronesia; Moldova; Mongolia (risk); Montenegro; Morocco; Nepal; Netherlands; New Zealand (risk); Nicaragua; North Korea; Norway (risk); Oman (risk); Pakistan; Palau; Panama; Papua New Guinea (risk); Philippines; Poland; Portugal; Qatar; Romania; Russia; Rwanda (risk); Saint Vincent and the Grenadines (risk); Saudi Arabia; Serbia; Seychelles; Singapore (risk); Sint Maarten (risk); Slovakia; Slovenia (risk); Somalia (risk); South Africa; South Sudan; Spain; Suriname (risk); Sweden; Switzerland; Tajikistan; Thailand; Timor Leste; Tonga (risk); Trinidad and Tobago (risk); Tunisia; Turkmenistan; Ukraine; United Kingdom; United States; Uruguay; Uzbekistan (risk); Vanuatu; Venezuela; Yemen; Zambia; and Zimbabwe (risk).

The following sections discuss common factors, also called drivers, and employment practices identified across many geographic locations including the countries listed above where risks and situations of forced labor in the construction sector have been identified. These factors and practices are often interrelated and can compound each other.

3.1 Involvement of Labor Contractors, Recruiters, Agents, or Other Middlemen in the Labor Supply Chain

The practices of some labor recruiters or other third-party intermediaries who recruit, hire, and/or manage workers are known to increase the risk of, and in some cases create situations of, forced labor. These practices include deceiving workers about the nature, conditions, location, compensation, and/or duration of the job; charging recruitment fees; withholding identity documents; and isolating workers at or near work sites. As discussed in Section 2 above, there is widespread use of contractors and

subcontractors for projects in the construction sector,³⁴ creating a fragmented workforce and resulting in a working and regulatory environment in which “it is unclear who is responsible for workplace provisions, safety and benefits.”³⁵ Due diligence and oversight of labor recruitment practices—which represent the biggest potential risk to workers—are particularly challenging, especially with multiple groups of workers coming and going over the course of a project.³⁶

Recruiters operate with varying degrees of legality in the construction sector, often recruiting workers from one country to another to work on construction sites; this is particularly risky for workers as it can involve charging illegal or unethical fees, providing fraudulent documentation and/or work authorization, or providing (and charging for) sub-standard housing and food, resulting in layers of substantial debt.³⁷ These recruiters are also known to provide inadequate or misleading information about the construction jobs and immigration status workers will receive, which further enhances the risks workers face.³⁸ For example, the UK construction sector is particularly dominated by labor agencies (also known as employment agencies) who manage most site-based hiring in the country by placing workers with construction companies. Since these agencies cannot sponsor workers’ visas directly, some recruiters turn to exploiting workers with fraudulent documentation or by using liability-shifting schemes, thus creating additional risk and vulnerability for workers.³⁹

3.1.1 Illustrative Cases

Labor contractors, recruiters, and agents are known to recruit a range of workers. However, their involvement in the recruitment, hiring, and in some cases management of migrant workers—and/or workers without legal documentation to work and reside in a country—raises particular labor risks. Vulnerability of migrant workers recruited by labor intermediaries is discussed in both this section and Section 3.2 below. In particular, the illustrative case discussed in 3.2.1, featuring migrant construction

³⁴ [Treck, Debbie. "Construction Supply Chain: Everything to Know in 2024." Buildertrend, 30 May 2025.](#)

³⁵ [Buckley, Michelle et al. "Migrant Work & Employment in the Construction Sector." ILO, 2016.](#)

³⁶ ["Modern Slavery in the Construction Sector - Industry Information." National Crime Agency.](#)

³⁷ [Crates, Emma. "Operation Cardinas and Beyond: Addressing Exploitation Risk in the Construction Sector." Independent Anti-Slavery Commissioner, April 2022.](#)

³⁸ [Buckley, Michelle et al. "Migrant Work & Employment in the Construction Sector." ILO, 2016.](#)

³⁹ [Miller, Gordon. "A house divided: the tension between the UK's new immigration rules, its climate and housing targets, and workers' rights." IHRB, 22 Jul 2025.](#)

workers in the Gulf States constructing sport stadiums, is illustrative of abuse of migrant workers that can result from recruitment agents' involvement in the recruitment and hiring process.

Cases of forced labor on construction sites resulting from labor recruiter practices have been widely documented in a variety of contexts. For example, in 2019, the owner of several construction companies was convicted on forced labor charges in California, after it was revealed that he had used his construction business to recruit illegal workers from Mexico to the United States and then refused to pay them for their work, threatening them with violence and deportation if they complained.⁴⁰ In another example, forced labor was found among Chinese workers recruited to build a casino on the island of Saipan. In this case, a multi-layered subcontracting arrangement resulted in each contractor hiring their own workers, almost all of whom were recruited from China. Many of these workers were recruited with the promise of a "good job" in the United States with the possibility of a green card and were provided tourist visas, rather than guest worker visas. On starting the job, workers experienced payment below minimum wage, fines for minor transgressions, having their identity documents withheld, sub-standard and unhygienic housing and food, threats and ridicule from managers, and refusal of medical treatment for injuries sustained on work sites.⁴¹

In 2015, a jury found that a marine industry company, U.S.-based lawyer, and India-based recruiter engaged in labor trafficking, fraud, racketeering, and discrimination in the recruitment and employment of hundreds of guestworkers from India who were employed as pipefitters, welders, and scaffolders to repair oil rigs in New Orleans following Hurricane Katrina.⁴² (For more information on this case, see the [Transportation](#) sector report.)

While most cases of unethical recruitment and employment practices are routine, widespread, and not criminal, there have been notorious trafficking cases in the construction sector. In the UK, a criminal network operated undisturbed for nearly a decade across London, recruiting and placing 300 to 500 workers at numerous major construction (building and demolition) sites involving at least 33 companies and ranging from construction contractors to payroll providers. In 2019, three individuals from this

⁴⁰ Slowy, Kim. "Contractor Faces 20 Years in Prison for Forced Labor." [Construction Dive](#), 25 Mar 2019.

⁴¹ Halegua, Aaron. "Forced Labor in the U.S. Construction Industry." [The Historical Roots of Human Trafficking](#). Springer International Publishing, 2021.

⁴² "David, et al. v. Signal International, LLC, et al." [ACLU](#), 29 May 2013.

network were found guilty of modern slavery offences, including using fraudulent means to acquire fake credentials for workers to access worksites.⁴³

The network was made up of Romanian gang members who recruited Romanian individuals from poor regions of Romania via gang members themselves, their associates, or word of mouth to what was described as lucrative construction jobs in the UK. The traffickers utilized deceptive techniques to entrap individuals in the work; in addition to the promised high wages, workers were told that travel, food, and accommodation would be provided. However, upon arrival in the UK, workers found themselves indebted to the gang members for all costs including travel, accommodation, food, transport, work permits, commute to worksites, and personal protective equipment which were deducted from their salaries even though salaries were never paid in full. Rather, workers received “pocket money” with the promise that their wages would be paid once the debt had been cleared.⁴⁴

Workers were provided with substandard housing owned or managed by the criminal network that was infested with cockroaches and rats. A shortage of bedding in the properties meant that workers had to search for mattresses that had been thrown out, or improvise sleeping arrangements, and workers only had access to washing facilities once or twice a week. These unhygienic housing arrangements were compounded by workers being fed rancid meat, causing many to become ill.⁴⁵ Further, workers had their passports and identity documents confiscated, experienced threats and intimidation, and were controlled at work, with the traffickers and their network associates acting as translators on construction worksites.⁴⁶

3.2 Migrant Workers and Immigrants with Precarious Residency Status

Both internal and international migrants make up a significant source of labor for the construction sector around the world, with many countries relying on migrant construction workers to address

⁴³ [Crates, Emma. “Operation Cardinas and Beyond: Addressing Exploitation Risk in the Construction Sector.” Independent Anti-Slavery Commissioner, April 2022.](#)

⁴⁴ [Crates, Emma. “Operation Cardinas and Beyond: Addressing Exploitation Risk in the Construction Sector.” Independent Anti-Slavery Commissioner, April 2022.](#)

⁴⁵ [Crates, Emma. “Operation Cardinas and Beyond: Addressing Exploitation Risk in the Construction Sector.” Independent Anti-Slavery Commissioner, April 2022.](#)

⁴⁶ [Crates, Emma. “Operation Cardinas and Beyond: Addressing Exploitation Risk in the Construction Sector.” Independent Anti-Slavery Commissioner, April 2022.](#)

construction labor shortages.⁴⁷ For example, more than a third of construction workers in India are internal migrants.⁴⁸ In Gulf States, over 90 percent of construction workers are migrant workers.⁴⁹

Although they have long underpinned the functioning and growth of the sector, migrant workers face numerous challenges including exploitative practices during recruitment (whether they are recruited internationally or within a country to urban centers),⁵⁰ and on-the-job safety risks, health issues, and social isolation, which all increase their risk for forced labor.⁵¹ In some cases, their visas are tied to specific employers, and some have their identity documents confiscated, which further compounds their vulnerability. Threats of denunciation and deportation are another way employers coerce workers in forced labor.⁵² Migrant workers who join crews on a series of short-term employment contracts, which is common practice, are in general reluctant to raise complaints or concerns related to the work for fear of having contracts not renewed.⁵³ Migrant workers often lack information or social supports in the city/country where they work. While migrant workers may have some protected rights to freedom of association in specific countries, they are sometimes barred from full participation in unions or collective bargaining. Finally, migrant workers are often willing to accept wages in cash, leaving no record of payment or employment, which can leave workers vulnerable to exploitation including wage withholding, low wages, and lack of overtime pay, for example.⁵⁴

Illegal immigrant workers are also vulnerable to illegal wages—primarily not being paid for overtime—as employers know they are workers with little job security who fear being laid off or potentially reported

⁴⁷ [Buckley, Michelle et al. "Migrant Work & Employment in the Construction Sector." ILO, 2016.](#)

[Lyu, Sainan et al. "Migrant Workers in the Construction Industry: A Bibliometric and Qualitative Content Analysis." *Buildings* 2025, 15\(5\), 761.](#)

⁴⁸ [Sharma, Anisha et al. "Understanding the Impact of Low-Cost Loans on Forced Labor." National Bureau of Economic Research Working Paper Series, Sept 2024.](#)

⁴⁹ [Kinkoh, Hubert. "Understanding the Drivers and Impacts of Sub-Saharan Africa Labor Migration to the GCC." Gulf Research Center, 12 Jun 2025.](#)

⁵⁰ [Trubiano, Franca. "Forced Labor, Urban Migration, and the Built Environment." Design For Freedom by Grace Farms.](#)

⁵¹ [Lyu, Sainan et al. "Migrant Workers in the Construction Industry: A Bibliometric and Qualitative Content Analysis." *Buildings* 2025, 15\(5\), 761.](#)

[Sharma, Anisha et al. "Understanding the Impact of Low-Cost Loans on Forced Labor." National Bureau of Economic Research Working Paper Series, Sept 2024.](#)

⁵² [Barrick, Kelle et al. "Risk and Protective Factors for Experiencing Labor Trafficking and Other Labor Abuse in the Construction Industry." Human Trafficking Policy & Research Analyses Project, Sept 2024.](#)

⁵³ [Lyu, Sainan et al. "Migrant Workers in the Construction Industry: A Bibliometric and Qualitative Content Analysis." *Buildings* 2025, 15\(5\), 761.](#)

⁵⁴ ["Immigrant Workers Being Exploited in Recent Construction Growth." Law Office of John J. Sheehan, 2025.](#)

to authorities and are unlikely to complain.⁵⁵ In the United States, it is estimated that more than 23 percent of the construction workforce comprises immigrants, about half of whom are illegal.⁵⁶ These workers are concentrated in trades related to home building (e.g. plasterers, stucco masons, drywall/ceiling tile installers, roofers, painters, and carpet, floor, and tile installers), accounting for about 50 percent of each profession.⁵⁷

3.2.1 Illustrative Cases

Labor abuse among migrant workers in many sectors, including construction, has been widely documented in the Gulf States. Migrant workers from India, Bangladesh, Nepal, the Philippines, and Pakistan often pay extremely high recruitment fees to recruiters in order to secure jobs, including in the construction sector. Upon arrival, workers find themselves in situations of debt bondage; working conditions are worse than they have been led to believe, and they are often not paid the wages promised, but they have no choice but to work to repay their recruitment debt. Visa sponsorship systems in a number of the Gulf States tie workers directly to their employers, meaning that if they wish to leave their employer, they lose their legal status and become vulnerable to retribution levied by governments that treat them as illegal immigrants.

Construction projects in these regions are often tied to global events, such as Fédération Internationale de Football Association (FIFA) World Cups. Over the years, labor abuse and exploitation have been documented in connection to the construction and operation of stadiums, hotels, and transportation infrastructure for FIFA World Cup events in numerous countries. In 2022, research conducted by the organization Equidem documented “significant labor and human rights violations” involved in the construction of all eight FIFA World Cup stadiums in Qatar, including being overworked in a culture of fear involving nationality-based discrimination, workplace violence, physical violence, verbal abuse, and threats; health and safety risks including high risk of occupational injury, extreme weather, and inadequate nutrition; and retaliation for reporting rights violations and not being able to seek alternate employment.⁵⁸ Saudi Arabia, which is slated to host the 2034 World Cup, currently hosts 13.4 million

⁵⁵ [Pavilon, Jacquelyn and Vicky Virgin. “Climbing the Ladder: Roadblocks Faced by Immigrants in the New York City Construction Industry.” Center for Migration Studies, 23 May 2022.](#)

⁵⁶ [González-Hermoso, Jorge et al. “Mass Deportations Would Worsen Our Housing Crisis.” Urban Institute, 25 Feb 2025.](#)

⁵⁷ [“Concentration of Immigration in Construction Trades.” National Association of Home Builders, 2025.](#)

⁵⁸ [“If We Complain, We Are Fired.’ Discrimination and Exploitation of Migrant Construction Workers on FIFA World Cup Qatar 2022 Stadium Sites.” Equidem, 2022.](#)

migrant workers, including construction workers laboring on 11 new and four refurbished stadiums, over 185,000 new hotel rooms, as well as airport, rail, road, and bus network expansion.⁵⁹

3.3 Precarious Employment and Hazardous and Undesirable Work

Employment relationships in the construction sector are often informal, part-time, or temporary. Instead of permanent workers, sub-contracted firms often hire temporary workers on a project-by-project basis and, in some cases, as day laborers. Temporary or casual workers, including day laborers, are paid highly variable and seasonal incomes. Temporary and day workers are “at-will” employees and can be let go without cause at any time, which discourages any expression of concerns or grievances. Under these types of precarious employment arrangements, workers rarely have formal employment contracts or receive benefits of any kind; they often lack financial security, leaving them more likely to accept abusive working conditions such as hazardous work and forced overtime with excessive hours.⁶⁰

3.3.1 Hazardous and Undesirable Work

The ILO considers construction to be one of the most hazardous sectors, and the sector is notorious for having a high risk of accidents, injuries, and deaths.⁶¹ Aspects of construction work have also long been considered “dirty, dangerous, poorly-paid and—increasingly for many national citizens in rapidly growing economies—low-status work.”⁶² Construction laborers perform extremely physical work; typical tasks can include hauling heavy loads, stacking materials, and using hand and power tools. Operating some types of specialized construction equipment can also be labor intensive and dangerous. Work is often outdoors, exposing workers to potentially extreme conditions like excessive heat or cold. Workers are also exposed to unsafe noise levels and excessive vibrations from tools that can cause physical injury. Construction sites themselves can be dangerous as well, with laborers often working at heights and exposed to dusts, chemical vapor, asbestos, and other chemicals that may be harmful to their health.⁶³ The most vulnerable workers typically perform manual labor jobs, such as cleaning and lifting,

⁵⁹ [“‘Die First, and I’ll Pay You Later.’ Saudi Arabia’s ‘Giga-Projects’ Build on Widespread Labor Abuses.” Human Rights Watch, 4 Dec 2024.](#)

⁶⁰ [Theodore, Nik. “Build a Better South: Construction Working Conditions in the Southern U.S.” Workers Defense Project, 2017.](#)

⁶¹ [Shepherd, Rose et al. “Challenges influencing the safety of migrant workers in the construction industry: A qualitative study in Italy, Spain, and the UK.” *Safety Science* vol. 142, Oct 2021.](#)

⁶² [Buckley, Michelle et al. “Migrant Work & Employment in the Construction Sector.” ILO, 2016.](#)

⁶³ [Construction: A Hazardous Work. International Labour Organization, 23 Mar 2015.](#)

carrying, and loading items, as opposed to work that requires training qualifications. These jobs often receive less scrutiny than those performed by qualified tradespeople, making it easier for manual laborers to be engaged informally and sometimes illegally.⁶⁴

According to the National Immigration Forum, “immigrant construction workers are up to 30 percent more likely to suffer from work-related injuries than their native-born counterparts.”⁶⁵ These workers face increased danger due in part to language barriers that prevent them from adequately understanding safety guidelines or instruction on how to safely handle dangerous equipment. They also experience a higher rate of injury and illness due to being assigned more dangerous tasks and not having the leverage to negotiate their workload and work assignments. Finally, workers who are illegally in a foreign country are typically afraid to report safety violations and/or seek medical attention due to their immigration status and a fear of denunciation or deportation.⁶⁶

These vulnerabilities can be exploited and exacerbated by traffickers in order to make more money off of workers. In the UK case noted in section 3.2.1 above, the criminal network also “obtained and doctored asbestos removal certificates. As a result, some victims were forced to work in high-risk environments [at an increased hourly rate], exposed to toxic materials without the training or knowledge to protect themselves or others around them.”⁶⁷

3.3.2 Illustrative Cases

While the construction sector overall presents factors and practices that make workers vulnerable to forced labor, workers engaged in post-disaster construction have been found to experience even higher levels of risk. In addition to the sudden demand for labor and urgent project timelines that natural disaster clean up requires, which can create opportunities for workers to be taken advantage of,⁶⁸ post-disaster construction is considered more dangerous than standard construction due to lingering unpredictable weather patterns, structural damage to buildings, bridges, and roads, and infectious agents that may contaminate flooded areas, among other hazards. Despite these increased safety risks,

⁶⁴ ["Modern Slavery in the Construction Sector - Industry Information." National Crime Agency.](#)

⁶⁵ [The National Immigration Forum. "Immigrant Construction Workers in the United States." 12 Sept 2024.](#)

⁶⁶ [The National Immigration Forum. "Immigrant Construction Workers in the United States." 12 Sept 2024.](#)

⁶⁷ ["Modern Slavery in the Construction Sector - Industry Information." National Crime Agency.](#)

⁶⁸ [Elkhidir, Elrasheid. "Impacts of Natural Disasters on the Construction Industry: Contractors' Perspectives." CIB Conferences, May 2025.](#)

workers performing post-disaster construction work often do not have health insurance or access to health care and lack supplies to keep them safe.⁶⁹

A 2024 study on the construction sector in Houston, Texas found that while more than one in five (around 20 percent) of Houston construction workers experienced labor trafficking in construction at some point in their lifetime, 32 percent of construction workers employed specifically in post-disaster construction had experienced labor trafficking.⁷⁰ Study participants reported experiencing the following indicators of forced labor while performing post-disaster construction: being deceived during recruitment about the nature of the job and about the working and living conditions; having their pay or benefits withheld for no reason or to prevent them from leaving or quitting the job; working without a formal contract; performing additional services or responsibilities than originally specified; having mobile phones confiscated; being made to be available day and night without adequate compensation; being made to work in hazardous conditions without proper protective gear; experiencing constant surveillance at work; experiencing lack of or limited freedom of movement and communication; and experiencing emotional or psychological abuse, threats of physical violence, harm to personal or professional reputation, and denunciation to authorities.⁷¹

3.4 Poverty, Marginalization, and Lack of Social Capital

Poverty, social marginalization, and a lack of social capital among construction sector workers compound the risk factors described in all of the sections above. People living in poverty often lack social networks and relationships that would otherwise support their access to economic, employment, and educational opportunities. Jobs that are undesirable, dangerous, or otherwise difficult—and low-paying—are generally avoided by workers who have access to other options. The work is thus routinely done by individuals in extreme poverty, socially marginalized groups, migrant workers, immigrants who may not have local language fluency or transferable skills, and other minority groups.⁷² Because they

⁶⁹ [Perkison, William Brett and Bill Christian. "For Faster Disaster Recovery, Prioritize Reconstruction Workers." Baker Institute for Public Policy, 23 Oct 2023.](#)

⁷⁰ [Barrick, Kelle et al. "Labor Trafficking in Construction During the Recovery and Reconstruction from a Natural Disaster." Human Trafficking Policy & Research Analyses Project. Sept 2024.](#)

⁷¹ [Barrick, Kelle et al. "Labor Trafficking in Construction During the Recovery and Reconstruction from a Natural Disaster." Human Trafficking Policy & Research Analyses Project. Sept 2024.](#)

⁷² [Lenko, Mariya et al. "Migrant Work Conditions and Health Status – A Longitudinal Study on 'Dirty Work' Among Undocumented and Newly Regularized Workers." *Journal of International Migration and Integration* 10 \(26\), Aug 2024.](#)

[Maison Law. "The Unsafe 3-D Jobs of Migrant Workers." 28 Dec 2018.](#)

have little choice, these workers are more likely to accept terms that ultimately compel them to continue working, despite exploitive, abusive, or unsafe practices.

Limited ability to read or to converse in a local language (or the language of the workplace), being trapped in debt, holding work visas that are tied to a single employer, intimidation and threats by an employer, being fearful of authorities, having a fear of deportation, being homeless, experiencing substance addiction, and needing to send money to support relatives at home are other indicators that workers could be at higher risk of exploitation.⁷³

3.4.1 Illustrative Cases

In India, construction workers are predominantly unskilled laborers, and they are more likely than the average worker to be socially disadvantaged or from a socially marginalized and/or minority community, which can exacerbate their risk for forced labor.⁷⁴ One study found that 42 percent of internal migrant households from one drought-stricken area in India—most of whom were from Dalit and tribal communities—were exploited. Workers from Dalit and tribal communities from regions devastated by droughts are particularly vulnerable to exploitation as they make their way to urban centers in search of livelihoods to replace their agricultural-based ones. These workers make their way to urban centers, where they live precariously in ghettos on the periphery of the city, or at construction sites themselves, and take on unskilled/day laborer jobs on construction sites, acquired through informal and unregulated local labor markets where workers gather and contractors assign work, sometimes below minimum wage. Workers face the standard occupational health and safety risks of the construction sector as well as heat stroke, but often have to work to pay off debts. Desperate circumstances can easily be taken advantage of; reporting has documented that workers and their families are sometimes required to live and remain within construction sites surrounded by high walls and gates and are paid a fraction of promised monthly wages. They are threatened with violence when they demand pay. In some cases, contractors promise villagers stable work and decent daily wages, however when they arrive in the city, they find the situation different than promised; in one example, a family was confined to living in the

["Immigrants in the Low-Wage Workforce." Work Rise Network, 25 Aug 2025.](#)

[Farhana, M.H. et al. "Dirty, Dangerous, and Difficult Sectors: Challenges, Opportunities and Way Forward." Malaysian Journal of Industrial Technology 8\(3\), Sept 2024.](#)

⁷³ ["Modern Slavery in the Construction Sector - Industry Information." National Crime Agency.](#)

⁷⁴ [Sharma, Anisha. "Understanding the Impact of Low-Cost Loans on Forced Labor." National Bureau of Economic Research, Sept 2024.](#)

basement of the building they were constructing, made to work 15-hour days, and had their wages withheld.⁷⁵

Alleged exploitation linked to caste and marginalized status in the construction sector can occur across borders as well. In 2021, a wage claim filed in U.S. District Court in New Jersey alleged that the Bochasanwasi Akshar Purushottam Swaminarayan Sanstha (BAPS) Hindu sect, known for building temples around the world, had lured hundreds of low-caste, mostly Dalit, men from India to a temple construction site in New Jersey and exploited them for years. According to the claim, workers were reportedly promised jobs with standard working hours and time off to construct the temple in Robbinsville, N.J. However, workers reported being paid around USD 1 an hour for performing difficult manual labor for 13 hours a day. They further reported being brought to the United States under temporary religious visas (intended for use by clergy and missionaries) and presented as volunteers. Finally, the workers claim they had their passports confiscated, were confined to living in trailers in the fenced-in and guarded construction site, and were forbidden from talking to visitors. As of September 2025, the lawsuit was still being processed.⁷⁶

4. Recommendations: Due Diligence Steps to Address Risks

4.1 Conclusions

This report examined the forced labor risks in the operations and supply chains of companies supplying services, materials, and products across the construction sector.

The risks of exploitation of workers trace, in most cases, back to the inadequate due diligence processes of third-party service providers, labor agencies, and suppliers; deceptive and exploitive recruitment processes that result in worker debt and compound other risk factors for migrant workers; and the unique hazards of construction work.

⁷⁵ [Tripathi, Bhasker. "Forced into Construction Jobs, Migrants Must Now Contend with Climate Change." Pulitzer Center, 25 Mar 2023.](#)

⁷⁶ [Correal, Annie. "Hindu Sect is Accused of Using Forced Labor to Build N.J. Temple." New York Times, 11 May 2021.](#)

[Murphy, Colleen. "Federal Probe Into Labor Practices at N.J. Temple Ends, Clearing Path for Lawsuit to Resume." NJ.com, 19 Sep 2025.](#)

Companies should view the contents of this report as a starting point and seek to further develop their understanding of the specific weaknesses and risks in their supply chains at all tiers in order to implement dynamic and ongoing risk assessments and mitigation strategies.

The findings of this report largely point to potential gaps in companies' due diligence systems or approaches to managing risk. The following recommendations for addressing these potential process gaps offer construction entities practical guidance for implementing comprehensive measures to control forced labor risks and protect their operations and individuals who may be vulnerable to exploitation within their supply chains. Effective due diligence requires a systematic approach that integrates risk assessment, prevention and mitigation, capacity building, and monitoring. This involves developing comprehensive frameworks that can identify and address potential forced labor indicators across diverse operational contexts. The goal is not merely to achieve compliance but to create sustainable systems that protect vulnerable populations and prevent forced labor while maintaining operational efficiency and competitive advantage.

The [Responsible Sourcing Tool website](#) overall and the [Construction Sector Due Diligence Toolset](#) specifically provide technical tools to support the implementation of the following recommendations. The recommendations that follow and the toolset referenced align with the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Due Diligence Guidance for Responsible Business Conduct](#). Tool 1 of the Construction Toolset provides a model due diligence program for identifying potential risks of human trafficking within a supply chain, evaluating and prioritizing identified risks, implementing solutions, and monitoring and improving supplier performance over time.

4.2 Recommendations

4.2.1 Policy and Embedding Forced Labor Prevention Standards and Practices in Business Functions

- 4.2.1.1 Companies should include a clear prohibition against forced labor in their Codes of Conduct and supplier performance standards. (See Construction Tool 2.) This should include the “employer pays” principle, which requires that all fees and expenses relating to the recruitment and placement of a worker are paid to by the employer.
- 4.2.1.2 The policy should be clearly communicated to all business entities, including third-party service providers and labor agents, and included in business contracts. (See Construction Tool 5.) The contracts should also require that the policy be cascaded to the suppliers' suppliers.

- 4.2.1.3 Procurement staff should be formally assigned, trained, and supported to screen prospective suppliers, including third-party service providers and labor agents, for their commitment and capacity to meet the policy standards on avoiding forced labor. (See Construction Tools 3, 7, and 8.) There should be clear consequences established for supplier performance on achieving the standards.
- 4.2.1.4 Review of a supplier's management of forced labor risks should be incorporated in regular supplier engagements, such as quarterly business reviews, quality audits, and other existing supplier management processes.

4.2.2 Risk Assessment and Prioritization

- 4.2.2.1 Conduct a combined supply chain mapping and forced labor risk assessment as a key first step in creating a targeted strategy for segmenting and prioritizing risks to address. (See Construction Tool 6.) High level risk factors to consider include characteristics of country of operation, product or production processes involved, and workforce demographics (e.g., prevalence of migrant workers). Other factors to consider include a company's ability to influence suppliers based on volume/spend and the degree of harm to people that practices may cause.

4.2.3 Needs Assessment and Capacity Building

- 4.2.3.1 Based on the results of a risk assessment, companies should conduct deep dives (e.g., targeted research, risk assessments, rapid appraisals, supplier assessments) to develop and implement action plans to address the underlying causes of identified risk or issues. The activities, which should be informed by clear objectives and measurable success indicators, may range widely from supplier training to engagement in multistakeholder initiatives where companies individually lack the leverage to drive positive changes in an operating environment (e.g., where economic or political factors are immovable in the immediate term). (See Construction Tools 8, 10, and 11.)

4.2.4 Monitoring

- 4.2.4.1 Companies need to routinely evaluate whether they are implementing their due diligence processes as planned (e.g., new suppliers screened for forced labor risks, review of corrective action plans during regular supplier business reviews). (See Construction Tool 9 and the Supply Chain Due Diligence Process.)
- 4.2.4.2 The effectiveness of due diligence activities should be tracked to ensure the desired impacts are on target and sustainable (e.g., worker-paid recruitment fees are avoided, foreign migrant workers are in full control of their identification documents, workers have access to remedy).