

# Worker Voice in the Fight Against Forced Labour: The role of multinational enterprises in supply chain accountability

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## Abstract

This paper discusses worker-centred approaches to the identification of and response to labour violations in the supply chains of multinational enterprises (MNEs). Drawing on examples from Southeast Asia, it highlights how meaningful engagement with workers and collaborative partnerships benefit both business and workers by fostering learning and systemic improvements. The paper concludes that MNEs should move beyond traditional audit-based models and adopt strategies that prioritise worker involvement, transparency, and long-term accountability.

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## Introduction

Global supply chains are receiving growing attention from researchers and policymakers because of their substantial involvement in enabling forced labour and human trafficking. In response, governments in the Global North have introduced human rights due diligence (HRDD) standards and laws aimed at holding multinational enterprises (MNEs) accountable for abuses within their supply chains, such as the European Union's Corporate Sustainability Due Diligence Directive (CSDDD).<sup>1</sup> However, the effectiveness of these frameworks is increasingly limited. Recent developments—such as the rollback of Germany's *Supply Chain Act* and the delayed and diluted implementation of the CSDDD—do not just raise questions about long-term impact, they are actively weakening the

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<sup>1</sup> The EU CSDDD requires large European Union companies to conduct due diligence to prevent adverse human rights and environmental impacts in their value chains.

obligations companies must meet, reducing accountability in the present and undermining the intended purpose of these laws.<sup>2</sup>

Forced labour persists in global supply chains because businesses often prioritise cost and speed over workers' rights. Legal requirements alone are not enough; their impact depends on how MNEs apply them in practice. This commentary piece argues that meaningful action must begin with reliable abuse detection using trusted, worker-centred methods developed in collaboration with civil society. This requires ongoing engagement and continuous monitoring to capture real conditions and worker experiences.

## The Limits of Traditional Approaches

Traditional monitoring tools such as social audits and corporate feedback mechanisms have proven largely ineffective in detecting labour abuses within global supply chains. Social audits are the main tool for monitoring labour conditions in global supply chains. However, research shows audits often miss serious violations, especially when controlled by businesses<sup>3</sup> and in informal or migrant-heavy supply chains, where risks like debt bondage and illegal fees are common. Audits are usually announced in advance, allowing suppliers to hide abuses. Workers may fear retaliation and audits often lack transparency and independence. MSI Integrity found most audit-based initiatives are 'not fit for purpose',<sup>4</sup> while Human Rights Watch reports audits frequently overlook forced labour in high-risk sectors like seafood, garments, and electronics.<sup>5</sup>

Other business-commissioned tools, such as hotlines and grievance mechanisms, also suffer from significant limitations. Research shows that workers—particularly migrants—often avoid using company-managed hotlines or other tools due to fear of reprisals and a lack of trust in the confidentiality of these systems.<sup>6</sup> As a

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<sup>2</sup> A Fillmann, 'Germany's Supply Chain Law at a Crossroads: The Implications of the Proposed Shift to the CSDDD', *National Law Review*, 17 April 2025, <https://natlawreview.com/article/germanys-supply-chain-law-crossroads-implications-proposed-shift-csddd>.

<sup>3</sup> MSI Integrity, *Not Fit for Purpose: The Grand Experiment of Multi-Stakeholder Initiatives in Corporate Accountability, Human Rights, and Global Governance*, 2020.

<sup>4</sup> *Ibid.*

<sup>5</sup> Human Rights Watch, *Hidden Chains: Forced Labor in Global Supply Chains*, 2021.

<sup>6</sup> L Rende Taylor and E Shih, 'Worker feedback technologies and combatting modern slavery in global supply chains: Examining the effectiveness of remediation-oriented and due-diligence-oriented technologies in identifying and addressing forced labour and human trafficking', *Journal of the British Academy*, vol. 7, issue S1, 2019, pp. 131–165, <https://doi.org/10.5871/jba/007s1.131>; L Berg, B Farbenblum, and A Kintominas,

result, genuine grievances remain unreported and unresolved. These limitations highlight the need for worker-centred, collaborative approaches to due diligence.

## The Case for Worker-Centred Approaches

A more effective approach shifts from compliance to ongoing collaboration with workers toiling in global supply chains. In Southeast Asia, some companies work with NGOs, trade unions, and local groups to identify risks, address abuses, and improve labour conditions.<sup>7</sup> Guidance by the Organization for Economic Co-operation and Development emphasises meaningful stakeholder engagement and continuous improvement, requiring active participation from affected workers and communities.<sup>8</sup>

The Inclusive Labor Monitoring Action Network (ILMAN), initiated by the Issara Institute in 2023, is a worker-centred collaboration connecting civil society organisations (CSOs) and trade unions in both origin and destination countries to protect migrant workers throughout their migration journey.<sup>9</sup> At the core of the network is the secure, cloud-based Inclusive Labor Monitoring (ILM) system, which member organisations use to log and manage cases confidentially and in real time. Worker-validated data on recruitment and working conditions guide remediation efforts and drive continuous improvement among network partners. Access to the ILM system is free for all members.

The ILM system operates across multiple origin and destination countries in Asia, such as Thailand, Myanmar, Cambodia, and Nepal, bringing together civil society organisations, trade unions, recruitment agencies, employers, and brands to address labour exploitation in global supply chains, including forced labour and human trafficking. Central to the ILM approach is the empowerment of workers through safe, trusted grievance mechanisms—such as hotlines, Facebook Messenger, and WhatsApp—operated by CSOs and trade unions in workers’ own languages, ensuring confidentiality and accessibility.

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‘Addressing Exploitation in Supply Chains: Is Technology a Game Changer for Worker Voice?’, *Anti-Trafficking Review*, issue 14, 2020, pp. 47–66, <https://doi.org/10.14197/atr.201220144>.

<sup>7</sup> Issara Institute, *Collaborative Supply Chain Models in Southeast Asia*, 2024.

<sup>8</sup> OECD, *OECD Due Diligence Guidance for Responsible Supply Chains*, OECD, Paris, 2018.

<sup>9</sup> Founded in 2014, the Issara Institute is an independent NGO based in Asia, Europe, and the United States that tackles issues of human trafficking and exploitation. See Issara Institute, *Issara Means Freedom*, 2024, retrieved 10 December 2025, [https://63971280-8a4a-4f58-b968-3dadecb1cd6f.filesusr.com/ugd/71a966\\_5682e2051cc84220bf37277f22b76eff.pdf](https://63971280-8a4a-4f58-b968-3dadecb1cd6f.filesusr.com/ugd/71a966_5682e2051cc84220bf37277f22b76eff.pdf).

Through a secure, cloud-based case management system, ILM enables stakeholders to collaboratively refer, track, and resolve cases while monitoring recruitment and working conditions in near real time. Employers and recruitment agencies engage with the ILM Action Network by working with CSOs and trade unions on worker orientations and remediation efforts, promoting ethical labour migration, accountability, and continuous improvement across supply chains.<sup>10</sup>

In 2024 alone, over 165,000 workers accessed remedies through ILMAN, reporting issues such as wage theft, recruitment fees, unsafe working conditions, and harassment. Specifically, workers have raised concerns in five key areas: working conditions (36%), employer-employee relations (21%), labour recruitment practices (21%), payment systems (13%), and living conditions (8%).

Workers are not only identifying labour violations, but they are also actively using mechanisms that connect them with real remedies. For instance, according to ILMAN's dashboard (data current as of 2025), remediation-related financial transfers to workers amount to approximately USD 1,988,760 since 2021, with an additional USD 151,665 in illegal broker fees identified and halted since 2023.<sup>11</sup> These figures indicate that worker-driven grievance and monitoring channels are not merely registering complaints but are functioning as effective remedial mechanisms delivering measurable material benefits to affected workers.

In one case, several workers reported sexual harassment by a manager—including sexual pressure and verbal abuse—that previous audits had missed. The issue surfaced through the worker voice channels of an ILMAN member organisation, showing how independent reporting tools can uncover hidden abuses. In another example, during a training session for migrant workers on empowerment and their rights, two participants disclosed paying recruitment fees of USD 110–330. With employer support, the Issara Institute conducted a recruitment fee survey that identified nearly 200 affected workers. Remediation and reimbursement followed, and the Issara Institute provided ethical recruitment training to company staff and recruitment agencies in the country of origin. Workers who were already working for this company were also clearly informed that they should never be charged any fees during their recruitment journey.

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<sup>10</sup> Issara Institute, 2024

<sup>11</sup> See 'Inclusive Labor Monitoring Community Dashboard', retrieved 7 December 2025. <https://www.workervoices.org/responsible-recruitment>.

## Conclusion

Ending forced labour in global supply chains requires more than compliance with legal frameworks. MNEs cannot effectively address forced labour if they rely solely on audits and top-down tools that are not transparent and that workers do not trust. Real progress happens when MNEs prioritise collaboration with workers over formal compliance—listening to workers, supporting grassroots monitoring, and building long-term partnerships with civil society organisations and local groups.

Worker-centred mechanisms, like the Inclusive Labor Monitoring system, are more effective at surfacing abuses, as well as building systems of learning and accountability that improve over time. Suppliers who engage in remediation have told Issara Institute that they benefit from reduced staff turnover, stronger relationships, and more stable production. Brands gain real-time, actionable intelligence that traditional audits rarely provide.

Sustainable progress depends on amplifying worker voice, strengthening local accountability, and demonstrating measurable improvements in workers' conditions. By centring worker perspectives in due diligence and supply chain management, MNEs can help make human rights a consistent global standard rather than an exception.

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