

DANISH CENTRE  
**AGAINST**  
HUMAN TRAFFICKING

**MANAGING THE RISK OF  
HIDDEN FORCED LABOUR**  
A GUIDE FOR COMPANIES AND EMPLOYERS

VERSION 1.0

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PREVENTING HIDDEN FORCED LABOUR. A GUIDE FOR COMPANIES AND EMPLOYERS

Version 1.0

Design: reDesign

Price: Free of charge

Published by the Danish Centre against Human Trafficking  
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## WHAT IS THE PROBLEM?

In recent years, several Danish business sectors have faced a number of new challenges in connection with the use of foreign labour, including undeclared work, pressure on working conditions and, in the worst case, cases involving human trafficking for forced labour. This applies especially to business sectors with many unskilled and relatively low-paid foreign workers, for example within cleaning, agriculture and plant nurseries, construction, distribution and hotels and restaurants. It applies not least to business sectors with extensive use of subcontractors, both Danish and foreign, where it may be difficult for a company to gain an overview of the working conditions for workers carrying out work in remote areas or at odd hours of the day. In this way, a company may unintentionally risk being associated with human trafficking for forced labour as a result of critical working conditions at a subcontractor or by direct employment involving identity theft (when work is carried out by someone other than the person employed).

The price to be paid for being associated with human trafficking for forced labour may be high. Danish and foreign companies which have been involved in cases of human trafficking for forced labour have experienced being exposed in the media with great damage to the company's reputation, resulting in loss of customers and a significant drop in earnings. In the worst case, this may result in police investigations with subsequent court cases and convictions.

These guidelines are a brief **guide for companies and employers** regarding the risk of human trafficking for forced labour and methods to avoid being associated with such cases unintentionally. These guidelines, which have been prepared by the Danish Centre against Human Trafficking (CMM)<sup>1)</sup> in consultation with a number of different stakeholders, are intended as an **information, risk management and prevention tool**.

The guidelines target all sectors and are intended as an aid for companies which may risk becoming affected by forced labour. The checklists (A, B, C) at the end of this publication include a number of measures which may be taken by companies to reduce the risk of hidden forced labour. They may be regarded as general guidelines and the extent to which the individual points should be implemented depends of course on the size of the company and the business sector in which it operates.



<sup>1)</sup> The Danish Centre against Human Trafficking (CMM) is part of the Danish National Board of Social Services under the Danish Ministry of Children, Gender Equality, Integration and Social Affairs. CMM bases its work on the Danish government's 'Action Plan to Combat Trafficking in Human Beings 2011-2014'. CMM has the following goals: a) to coordinate collaboration between public authorities, social organisations and other stakeholders, b) to collect and convey knowledge of human trafficking, c) to improve the social assistance offered to victims of human trafficking.

## HUMAN TRAFFICKING FOR FORCED LABOUR – FACTS AND LEGISLATION

- » The International Labour Organization (ILO) estimates that 20.9 million people are carrying out forced labour globally. Of these, 68% are being exploited in various private sectors, while 22% are being exploited in prostitution.
- » In the EU, ILO estimates that there are 880,000 victims of forced labour. Approx. 70% of these (610,000) are assessed to be exploited in various private sectors.
- » In Denmark, 33 persons were assessed to be victims of human trafficking for forced labour during the period 2007-2013.<sup>2)</sup>

Almost all EU countries have seen an increase in the number of cases involving forced labour in recent years. This is also true for Denmark, where 16 persons were identified as victims of human trafficking for different types of forced labour in 2012 alone. It is expected that this trend will continue as more people become aware of this issue and report their suspicion to the Danish Centre against Human Trafficking. The rising number of cases abroad and in Denmark stresses that this issue may potentially present a risk to Danish companies.

In practice, a person is often misled and deceived into accepting working conditions which subsequently prove to be different and worse than originally promised. Thus, the person has not offered himself/herself voluntarily as he/she did not know the real working conditions. When the person wants to leave this job, he/she is not able to do so without threats of punishment, reprisals and negative consequences for the individual worker if the work is not carried out. There may, for example, be direct physical threats or threats of not receiving wages already earned etc. These are all conditions which make the person feel threatened into continuing an employment relationship and a situation of exploitation which he/she would normally have left.

**Human trafficking** is included in Section 262a(1) of the Danish Penal Code (Straffeloven):

*A person who by an act of recruiting, transporting, transferring, housing or subsequently receiving another person is guilty of trafficking in humans and is liable to a term of imprisonment of no more than ten years if the following is used or has been used a) unlawful coercion under Section 260, b) illegal restraint under Section 261, c) threats under Section 266, d) unlawful inducement, encouragement or exploitation of a mistake or another manner of taking unfair advantage in order to exploit the person in question for prostitution, taking or recording of pornographic photographs or films, pornographic conduct, forced labour, slavery or slavery-like conditions, criminal acts or removal of organs.*

**Forced labour:** It is also stated in the preparatory work for Section 262a that the expression 'forced labour' should be interpreted according to ILO Conventions 29 and 105 on forced labour: *All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.*

(ILO Convention 29, Article 2(1), 1930)

2) CMM assesses or participates, in collaboration with the Danish Immigration Service, the police and, in some cases, the courts, in the assessment of whether a person may be designated a victim of human trafficking and thus entitled to be offered a number of social and health-related support initiatives. The immediate assessment is made based on a review of a number of indicators of human trafficking in each individual case. The number of persons assessed to have been trafficked thus reflects the number of persons who have officially been assessed to be victims of human trafficking and who are therefore entitled to be offered support. The assessments do not reflect the number of cases which have been investigated or tried by a court.



## HOW CAN HIDDEN FORCED LABOUR AFFECT YOUR COMPANY?

Your company may be associated with human trafficking for forced labour in **the following ways:**

- » **Through subcontractors:** Extensive use of subcontractors may contribute to the creation of non-transparency in working conditions and may increase the risk of subcontractors using illegal or undeclared labour or, in the worst case, forced labourers.
- » **In connection with employment through temporary staffing agencies or identify theft in connection with direct employment:** Employment through temporary staffing agencies may create a lack of clarity with respect to working and contract conditions. In connection with direct employment, there may be a risk of identity theft, which means that the work is actually being carried out by someone other than the employee and often under worse conditions.
- » **By using the company's products or services in a situation involving human trafficking:** This may involve cases where human traffickers use a particular travel agency, hotel or airline, which is then associated with a critical case.

## Risks and negative consequences of being associated with human trafficking for forced labour:

- » **Violations of the law.** This includes the risk of charges resulting in a prison sentence and/or fines.
- » **Poor reputation and damage to company image.** Even if the company is not directly involved, it may prove detrimental to be associated with charges of human trafficking for forced labour. This may lead to a loss of customers and declining sales and revenue. A damaged company image may be difficult to restore and may require a lot of resources.

## Benefits for the company of managing the risk of forced labour:

- » **Requirements from customers and business contacts.** Several public and private companies have clearly formulated policies on responsible corporate conduct in accordance with the UN guidelines on human rights and business and therefore have strict requirements which must be fulfilled by your company as a supplier or business partner.
- » **Strengthened CSR (corporate social responsibility) profile:** It contributes to strengthening the company's reputation.
- » **Enhanced company image:** It may contribute to strengthening the company's image internally among the employees and externally among customers and business contacts.
- » **Fighting unfair competition:** It contributes to combating unfair competition, for example in relation to companies which benefit from unreasonably low wages and doubtful working conditions for their employees.

## WHAT CAN YOU DO?

If you follow the seven simple steps below, your company will be reasonably safe from being associated with human trafficking for forced labour:

- 1** Read these guidelines, learn more about human trafficking for forced labour and follow the different steps and recommendations which seem relevant for your company
- 2** Make a quick risk assessment for the company and any subcontractors. Use 'Quick risk assessment – do-it-yourself', page 7
- 3** Prepare or obtain the company's guidelines with respect to human trafficking for forced labour. Use checklist A 'GENERAL PRECAUTIONS', page 8
- 4** Prepare or obtain the company's guidelines with respect to recruitment and employees. Use checklist B 'DIRECT RECRUITMENT AND EMPLOYMENT', page 9
- 5** Prepare or obtain the company's guidelines on the use of subcontractors and establish requirements for subcontractors. Use checklist C 'PRECAUTIONS WHEN USING SUBCONTRACTORS', page 10
- 6** Inform the employees and subcontractors of human trafficking for forced labour and indicators of human trafficking. Use 'RED FLAGS AND INDICATORS', page 12
- 7** Contact the **Danish Centre against Human Trafficking's** hotline or the police in case of justified suspicion of human trafficking for forced labour, see 'USEFUL CONTACTS AND LINKS', page 14

### MONITORING AND FOLLOW-UP

- Reassess the risk regularly and implement monitoring mechanisms. Use checklists from these guidelines (a, b, c) and check that the requirements are being fulfilled
- Make the company's policy and efforts against human trafficking for forced labour visible and incorporate them into the company's CSR strategy to strengthen a positive company image
- Contact the **Danish Centre against Human Trafficking** for further information on human trafficking for forced labour and on courses and instructional material, see 'USEFUL CONTACTS AND LINKS', page 14

## QUICK RISK ASSESSMENT – DO-IT-YOURSELF

Critical working conditions and hidden forced labour, especially in connection with the use of subcontractors, may occur within practically all business sectors. In Denmark and other Western European countries, examples of forced labour have been seen especially within cleaning, agriculture and plant nurseries, construction, distribution and hotels and restaurants. Experience has shown that the risk is particularly high if a company can answer yes to the questions below. An initial risk assessment is therefore a good idea. **Review the list below and assess whether one or more points are true of your company.**

Does your company use unskilled, temporary and/or seasonal labour?	<input type="radio"/>
Does the company employ many foreign employees who do not work according to a Danish collective agreement?	<input type="radio"/>
Does the company have foreign workers/temporary staff employed under temporary contracts who are engaged by foreign or Danish temporary staffing agencies?	<input type="radio"/>
Does the company use subcontractors (possibly with several links in the supply chain), temporary staffing agencies and short-term seasonal contracts?	<input type="radio"/>
Are there job functions which are outsourced and carried out by foreign workers/ temporary staff who are not immediately visible or noticeable because the work is carried out at night or in remote places?	<input type="radio"/>
Is the company part of a business sector which has previously been affected by undeclared labour, social dumping, illegal labour and human trafficking?	<input type="radio"/>

*Underpayment and people not being paid in line with the collective agreement is a major problem in our industry. Undeclared work and social fraud are also common in a great many places. There are examples of hotels which have actually made a serious effort to follow the rules, but have been tricked by the cleaning company disguising things in seven layers of subcontractors. Then it turns out that the employees they thought were being paid in line with the collective agreement were actually receiving DKK 37 per hour and living in a cardboard box. There was a major case 2-3 years ago. I think this has made many of the large serious companies more thorough in their research of external suppliers.*

HR MANAGER, DANISH HOTEL CHAIN

## REDUCE THE RISK AND DISPLAY RESPONSIBLE CORPORATE CONDUCT

The government's 'Action plan for corporate social responsibility 2012-2015' encourages all Danish companies to display responsible corporate conduct by following internationally recognised guidelines such as the UN guidelines on human rights and business and the UN Global Compact (see links on page 14). In this connection, especially the following general principles are important for the prevention of hidden forced labour:

**Human rights:** 1) Businesses should support and respect the protection of internationally proclaimed human rights and 2) make sure that they are not complicit in human rights abuses.

**Labour:** 1) Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining 2) support the elimination of all forms of forced and compulsory labour 3) support the effective abolition of child labour, and 4) the elimination of discrimination in respect of employment and occupation.

### CHECKLIST:

Below are checklists of initiatives which may **reduce the risk** of hidden forced labour. The checklists are intended as recommendations and should be used as inspiration for possible actions depending on the degree to which your company finds them relevant. Similarly, the extent to which the individual points can and should be implemented depends on the size of the company and the business sector in which it operates. For example, medium-sized and large companies may benefit from preparing a strategy against forced labour as part of its policy on responsible corporate conduct, while this may be less relevant for small companies. It is up to the individual company to assess which points are most relevant to obtain the best protection.

### A: GENERAL PRECAUTIONS

		YES	NO
1	Is the company aware of human trafficking for forced labour and the applicable legislation?		
2	Has the company drawn up guidelines against human trafficking and hidden forced labour?		
3	Has the company considered including the points below in the company's general guidelines?		
	a) Obligation to combat forced labour in the company in connection with direct employments and when using subcontractors		
	b) Procedures for action and consequence in the event of signs of forced labour		
	c) Guarantee that the employees have freedom of movement and are free to enter into and terminate employment		
	d) Regular risk assessment and monitoring of working conditions among employees and at subcontractors		
	e) Clear procedures for follow-up, including regular random checks of working conditions and subcontractors		
4	Are the company's guidelines on prevention of forced labour and status within this area included in the company's annual report/status report?		
5	Does the company know which groups of workers/temporary staff are most likely to be exploited and which circumstances render workers/temporary staff vulnerable to exploitation?		
6	Does the company collaborate with authorities, trade associations and trade unions on identifying and reporting possible cases of human trafficking for forced labour?		
7	Has the company notified partners in the supply chain of the risk of human trafficking for forced labour?		
8	Do the company's middle managers talk to the workers regularly and informally to hear about their working conditions and any critical conditions?		



## B: DIRECT RECRUITMENT AND EMPLOYMENT

		YES	NO
1	Does the company have a detailed employment procedure which clarifies who has direct responsibility for each employment and direct responsibility for each individual employee?		
2	Does the company ensure that each employment takes place at a personal meeting with the individual employee where the employee comes to the company's address for joint signature of the contract?		
3	Does the company ensure that the contract is drawn up in a language which the new employee understands and that the employee understands all the details in the contract?		
4	Does the company consider using independent interpreters to communicate with foreign employees who do not speak Danish?		
5	Does the company ensure that the employee brings the following original documents to the interview?		
	a) Criminal record and consent form		
	b) Registration certificate for EU citizens		
	c) Work permit and residence permit for non-EU citizens		
	d) Copy of photo identification such as passport for non-Danish citizens		
	e) Health insurance certificate		
	f) Any security clearances Check their authenticity and contact the police in case of doubt. Remember to check the date and the date of expiry for all documents/permits.		
6	Does the company ensure that the person who is present is identical to the person in the identification documents (passport)? Check the photo identification, age, height, eye colour, ear shape etc.		
7	Does the company remember to copy all employment documents and keep them in the staff file at the company?		
8	Have specific declarations been prepared which must be signed by the employee regarding the employee's rights and obligations, for example that the employee is not allowed to bring unauthorised persons to the workplace?		
9	Does the company consider issuing an identification card with photo and date of expiry at the time of employment, which must always be carried by the employee at the workplace?		
10	Does the company consider covering all expenses in connection with recruitment so that expenses are not imposed on employees directly or indirectly?		
11	Are the following questions asked at the employment interview at the company:		
	a) Where did the person hear about the job? (recruitment)		
	b) Did the person pay a third party to come to Denmark?		
	c) Has the person or must he/she pay a third party to be employed? Is the person in debt as a result?		
	d) Where does the person live (address)? Who is the person's landlord? What is the person's phone number and who should be contacted in case of an emergency? (See the section 'Red flags and indicators', page 13)		
12	Is the job candidate informed of rights such as hourly rate, working hours and the possibility of joining a trade union at the employment interview?		
13	Does the company inform new employees in training of signs of human trafficking for forced labour?		
14	Has the company informed foreign employees of their rights and obligations as employees in Denmark?		

## C: PRECAUTIONS WHEN USING SUBCONTRACTORS

		YES	NO
1	Have guidelines been prepared on how to avoid exploitation of labour and hidden forced labour in the supply chain?		
2	Has the company included a permanent clause in contracts with subcontractors and other partners which ensures zero tolerance of human trafficking and forced labour? Can the company terminate the contract immediately if this clause is not observed?		
3	Has the company chosen a strategy/policy in connection with the use of suppliers and subcontractors? The following points should be decided:		
	a) Should the employees carrying out the task be employed directly by the supplier? Or should the subcontractor be entitled to use additional subcontractors? If so, it should be a requirement that all suppliers are subject to the same conditions.		
	b) To which extent should it be possible for suppliers to have subcontractors carry out part of or the entire task?		
	c) Is the supplier under an obligation to ensure that the workers employed by the supplier and any subcontractors in Denmark are working under wage/pay and employment conditions which are not less favourable than the usual conditions on the Danish labour market?		
4	Are the supplier's obligations clear and part of the contract so that the company ensures that all statutory and authority requirements applicable to the company and the performance of the service are observed? Has the company ensured that:		
	a) The supplier is responsible for ensuring that any subcontractors fulfil the same requirements and obligations as those applying to the supplier under the contract?		
	b) The company may at any time request documentation from the supplier showing that these requirements and obligations are fulfilled?		
5	Has the company ensured that it is only possible to use subcontractors which have been approved in writing? In this connection, the company should ask the supplier and any subcontractors to present a service certificate from the Danish Business Authority or present documentation with similar information. The service certificate should not date back more than six months. By checking the supplier's service certificate, it is ensured that the supplier:		
	a) has not been found guilty of any criminal offences and is not involved in a pending criminal case.		
	b) observes its payment obligations to the public authorities (social security schemes, direct and indirect taxes etc.).		
	c) is not being wound up or the like.		
6	Does the company ask the supplier to present registration certificates documenting that the supplier is registered with SKAT (the tax authorities) in accordance with the Danish VAT Act (Momsloven) and the Danish Income Tax Act (Skatteloven)?		
7	Does the company remember to check whether foreign suppliers are under an obligation to be registered in the Danish Register of Foreign Service Providers (RUT)? If a foreign company is found not to be registered with RUT, this must be reported to the Danish Working Environment Authority.		
8	Has the company concluded a written contract with subcontractors under which employees are not obliged to pay charges/fees in connection with recruitment?		

## C: PRECAUTIONS WHEN USING SUBCONTRACTORS, CONTINUED

		YES	NO
9	Does the company consider whether the supplier observes the following?		
	a) The supplier employs and pays wages to the employees and assumes ordinary employer's liability.		
	b) All employees have received a statement of terms and conditions before the commencement of the work. At the company's request, the supplier sends a copy of the statement of terms and conditions within five working days.		
	c) All employees must be employed by the supplier or by a subcontractor approved by the company. The employees are not permitted to use own assistants, family members etc. for the performance of the work.		
	d) The employees must carry a visible identification card issued by the supplier or a subcontractor approved by the company. The identification card carries a photo of the employee and unambiguous identification of the employee (such as employee number, civil registration number).		
	e) The company is entitled to contact the supplier's employees without prior notice to obtain information about an employee's identity.		
	f) The supplier is responsible for ensuring that only employees with valid residence and work permits are used. In order to ensure identification of foreign employees, the supplier makes a copy of the passport or other type of documented photo identification and work and residence permits, if relevant, for employees from non-EU countries. This documentation must be presented within two working days at the company's request.		
	g) The supplier must ensure that wages, tax on regular income and labour market contributions are reported to the tax authorities for the work performed according to the rules applicable to the employer.		
	h) The employees have been provided with and wear uniform and easily recognisable work clothes (if such are used).		
10	Can the company at any time request that the supplier present within five working days a copy of the subcontractor's financial statements for the last three years, but not earlier than from the subcontractor's starting date?		



## **RED FLAGS AND INDICATORS OF HUMAN TRAFFICKING FOR FORCED LABOUR**

Employees and temporary staff who are subjected to human trafficking for forced labour are often silent about their actual situation due to threats or fear of reprisals. Critical conditions are thus more likely to be revealed by others such as authorities, alert employers, trade unions or ordinary citizens.

It is often impossible to gain a full picture of whether a person is being subjected to human trafficking for forced labour. You therefore have to act on the immediate facts, a sense that 'something is wrong' and on information emerging through observations or conversations with employees or others at the workplace.

Above is a list of 'red warning flags' which may be indicators of human trafficking for forced labour. If several of these indicators are recognised in connection with a work situation involving the company (for example through subcontractors), the conditions should be investigated further and CMM should perhaps be contacted on the hotline number at 7020 2550. If several indicators coincide it may be a sign of human trafficking.



## RECRUITMENT AND EMPLOYMENT PROCESS

- » A group of foreigners are presented to the employer by a person (often of the same nationality and/or ethnicity as the foreigners) with good Danish or English skills, claiming to be, for example, a friend or family member or just someone who wants to help. The person speaks on behalf of the persons in the group and waits while these persons are at the job interview
- » Employment documents submitted to the company are filled in at a higher level of Danish than mastered by the job applicant
- » The employment documents are delivered by a 'friend' or 'family member' on behalf of the job applicant
- » The applicants seem nervous or secretive and/or act as if they have received instructions from a third party
- » A third party calls the company to talk about a friend or a family member who would like to work for the company
- » There is an increase in the number of non-Danish speaking workers of a certain nationality who are organised by one subcontractor of the same nationality
- » When comparing the employees' phone numbers, it becomes evident that several of them have stated the same phone number
- » When comparing the employees' addresses, it becomes evident that several of them have stated the same address
- » When comparing the employees' account information, it becomes evident that several of them have stated the same account information
- » When comparing the person stated by the employees as the person to be contacted in an emergency, it becomes evident that several of them have stated the same person independently

## THE WORKPLACE AND WORKING CONDITIONS

- » The employees are transported to and from the workplace by persons not employed at the workplace
- » An employee provides food for the other employees at the workplace
- » The employees show signs of physical injury and poor nutrition and their general appearance may seem untidy/unkept with clothing that is inadequate for the season
- » The employees seem nervous and cowed (afraid of employer/backer/authorities)
- » The employees are silent or provide vague information when asked about the working conditions, including working hours, and their time of arrival in Denmark
- » Gross restriction of movement at the workplace and/or the worker's living quarters
- » The employees are not paid their wages/the wages are withheld or they are extremely underpaid
- » The employees have no contract and the work is not organised
- » The employees work long hours, including weekends
- » The employees do not have a phone number for the supervisor or any contact with this person
- » The employees owe a great debt to the supervisor, the recruitment company or others
- » The employees have no identification information. Identification documents and personal documents seem to have been confiscated, and the employee cannot leave the site or document his/her identity/status
- » The employees present false identification documents/personal and/or travel documents
- » The employees have been subjected to threats of being reported to the authorities and possibly also to physical violence
- » The employees have no or limited access to medical treatment

## LIVING CONDITIONS

- » The employees say that they rent their living quarters from a person working for the subcontractor or the recruitment agency
- » The employer provides, for example, food and accommodation at inflated prices and deducts the amount from the wages so that the employee has only a minimal or no income
- » The employees live in poor housing conditions and/or with many people living in/crammed into the same place
- » The employees live on site (in rooms where construction is underway, back rooms, basements)

## **USEFUL CONTACTS AND LINKS**

Contact the Danish Centre against Human Trafficking on suspicion of human trafficking for forced labour or on contact with potential victims.

### **CMM'S HOTLINE 7020 2550**

Read more about CMM and human trafficking: [www.centermodmenneskehandel.dk](http://www.centermodmenneskehandel.dk)

CMM can offer companies advisory services, training/lectures and information about human trafficking for forced labour and identification of human trafficking.

Contact CMM at the Danish National Board of Social Services on telephone number 7242 3700.

With respect to victims of human trafficking, CMM offers:

Protection and accommodation. Support, help and advice on social, psychological, legal and health-related issues. Reflection period of up to 120 days. Prepared return and offers of reception and assistance in their home country.



## USEFUL CONTACTS AND LINKS

- » The Danish National Police (Rigspolitiet), the Danish National Police's Domestic Investigative Centre (Det Nationale Efterforskningscenter, NEC): tel. 4515 5040
- » Hotline for the Danish Working Environment Authority: 7012 1288: [www.arbejdstilsynet.dk](http://www.arbejdstilsynet.dk)
- » SKAT: [www.skat.dk](http://www.skat.dk)
- » Danish Business Authority: [www.erhvervsstyrelsen.dk](http://www.erhvervsstyrelsen.dk) / [www.samfundsansvar.dk](http://www.samfundsansvar.dk)
- » Danish Council for Corporate Responsibility (Rådet for samfundsansvar): [www.raadetforsamfundsansvar.dk](http://www.raadetforsamfundsansvar.dk) (See 'Retningslinjer for ansvarlig leverandørstyring' (Guidelines for responsible supplier management))
- » Mediation and Complaints-Handling Institution for Responsible Business Conduct (Mæglings- og klageinstitutionen for ansvarlig virksomhedsadfærd): [www.virksomhedsadfaerd.dk](http://www.virksomhedsadfaerd.dk)
- » CSR Compass (CSR Kompasset): [www.csrkompasset.dk](http://www.csrkompasset.dk)
- » Global Compact self assessment tool: [www.globalcompactselfassessment.org](http://www.globalcompactselfassessment.org)
- » UN Global Compact: [www.unglobalcompact.org](http://www.unglobalcompact.org)



In Denmark and abroad, different business sectors face new challenges when using foreign labour. Some experience undeclared work, pressure on working conditions and, in the worst case, cases involving human trafficking for forced labour.

A company may unintentionally risk being associated with human trafficking for forced labour as a result of critical working conditions at a subcontractor or by direct employment involving identity theft (when work is carried out by someone other than the person employed). This applies especially to business sectors with many unskilled and relatively low-paid foreigners, for example within cleaning, agriculture and plant nurseries, construction, distribution and hotels and restaurants.

The price to be paid for being associated with human trafficking for forced labour may be very high for the companies.

The Danish Centre against Human Trafficking has prepared these guidelines, which serve as a quick guide for companies and employers risking to become associated with forced labour.

These guidelines have been prepared in consultation with a number of different stakeholders and are intended as an information, risk management and prevention tool. They describe the risk of human trafficking for forced labour and how best to avoid being associated with such cases unintentionally. Furthermore, they include checklists of a number of measures which may be taken by companies to reduce the risk of hidden forced labour.

The Danish Centre against Human Trafficking is part of the Danish National Board of Social Services under the Danish Ministry of Children, Gender Equality, Integration and Social Affairs.

The Danish Centre against Human Trafficking coordinates collaboration between public authorities, social organisations and other stakeholders, collects and conveys knowledge of human trafficking and improves the social assistance offered to victims of human trafficking.

The Danish Centre against Human Trafficking offers companies advisory services, training/lectures and information about human trafficking for forced labour and identification of human trafficking.