



Ethical
Trading
Initiative



Guidelines for employment and integration of people displaced from Ukraine

Recruiting displaced workers from Ukraine

In response to the Russian invasion and ongoing conflict in Ukraine and subsequent mass displacement of the population, this document provides guidance on how to support the employment of refugees and displaced people, with secure, decent, safe and fair work with mainstreaming of gender considerations in mind.

It should be noted that this is a complex and ever-changing situation, and so this guidance will be updated where necessary and should not be read as an exhaustive list of actions.

DO

1. Ensure to conduct due diligence on any third-party labour recruiters or employers you use and that these are licensed and registered, including in subcontracted facilities if applicable.
2. Consider using duly recognized databases and resources during the recruitment process such as official government supported platforms and public employment agencies, such as in the [local resource database](#).
3. Ensure any fees and related costs during the recruitment process are covered by the employer and not the employee, such as outlined in the [Employer Pays Principle](#).
4. Adopt non-discriminatory recruitment practices towards Ukrainians and third-country nationals fleeing Ukraine. Aim to employ displaced people at their knowledge, skill and physical level.

DON'T

5. Hire any workers without proper or valid authorisation.
6. Use third-party providers e.g. recruitment agencies, who do not have high ethical standards as outlined in the resources below.

Evidence suggests that the greatest risks for workers exist where third party labour providers are managing recruitment and/ or employment. Businesses should focus on risks related to third-party labour providers. Resources to support this include:

- [Stronger Together Recruiter Compliance Principles and Good Practice Implementation Checklist](#)
- [IOM and ICC's Employer Guidance to support people displaced from Ukraine](#)

Commencing employment and language requirements

DO

7. Ensure all workers are given a written contract in a language that they understand before they are hired.
8. Support workers to obtain documentation, particularly for those not supported by the [EU's Temporary Protection Directive](#), with support outlined in the [local resource database](#).
9. Understand workers' language requirements and ensure they are able to understand their employment terms and conditions and communicate any issues or grievances.
10. Ensure all workers understand their rights and responsibilities at the workplace.
11. Provide all training and information on Health & Safety and labour rights in a language the worker understands, including through signposting to resources provided in the [local resource database](#).

DO

12. Provide clear information on how workers can communicate with management and raise grievances internally and externally, such as through a whistleblowing line, and with anonymity. Specific attention should be paid to ensuring female workers are able to raise grievances on issues related to gender-based violence.
13. Ensure all managers, supervisors, and line leaders at the workplace involved in recruitment and supervision of workers know how to respond immediately on being alerted to potential indicators that an individual or group of workers on site may be subject to exploitation or unfair treatment.



Refugees from Ukraine arrive in Krakow, Poland

Documentation and payment of wages

DO

14. Collate a full list of ALL employees, detailing their name, identification document number, date of birth and date of joining, while ensuring personal data protection including issuing consent forms for employees to sign. 'Gender' should be included as category of employee data collection.
15. Review and maintain copies of identification documents for ALL workers. If workers request safe storage of documentation with written permission, keep the documents in individual, lockable storage to which the worker can have immediate access.
16. Maintain a gender-disaggregated list of all young workers (up to 18). All young workers must be treated equally. Commit to data protection principles and share no further without workers' expressed permission.
17. Ensure that all workers are provided with at least the National Minimum Wage, Overtime Premium, weekly rest day, hazard pay and are paid equally to and no less than other workers for the same job/qualification.

DO

18. Ensure all workers have access to their wages, ideally through an individual bank account. In cases where the worker does not have a bank account, consider supporting them with opening an account. Ensure that bank charges do not reduce their pay.
19. Ensure that all workers are afforded equal treatment and do not experience discrimination on any grounds, particularly on the basis of their gender, race, religion, age, sexual orientation, disability or other characteristics.
20. Document all actions taken, including wage payments and receipts.

DON'T

21. Retain workers' original identification documents, unless expressed and written permission is given by workers, in which case they should be kept in individual, lockable storage to which workers can have immediate access.
22. Produce any falsified records.
23. Limit access to reasonably requested documents or records, or share without workers expressed permission.

Accommodation and transport

DO

24. Ensure decent living conditions for workers and their families, including children housed in residential complexes, with an accommodation contract in a language the worker understands.
25. Provide details of support services to workers – (such as for housing, education, healthcare, childcare services, psychological support, financial support/bank accounts provided in the [local resource database](#)).
26. Ensure that records are kept where workers are being accommodated by landlords who work for the labour provider.
27. Monitor the provision of transport for workers to ensure there are no opportunities for exploitation.



EU / Wojtek Radwanski

More than 5 million people have left Ukraine for neighbouring countries since the start of the conflict

Supporting workers' integration and wellbeing

DO

28. Engage with workers at induction, and repeatedly throughout workers' duration of employment, to better understand their experiences during recruitment and throughout employment and be prepared to provide support if exploitation is identified. When engaging with female workers, endeavour to make available trained experts who can identify cases of gender-based violence and harassment.
29. Support the integration of employees displaced from the conflict in Ukraine into the workplace and the local community outlined [here](#), including through engaging with trade unions or NGOs. Be mindful of their psychosocial needs and the support they may need in addressing trauma due to conflict and displacement.
30. Partner with support organisations, trade unions, NGOs, women organisations, and charities who can provide support to workers who have experienced exploitation and help develop an "action plan" for remediation if exploitation has been identified.

DON'T

31. Expel any refugees from the factory (and in any case in which undocumented migrant workers are identified, then DO assist and support the worker to obtain legal documents).
32. Discriminate against any worker, particularly on the basis of their gender, race, religion, age, sexual orientation, disability or other characteristics.
33. Threaten the workers or their families or obstruct the progress of remediation.

Beyond your company

DO

34. Engage with any sub-contracted factories, farms or service providers to ensure that they are implementing good recruitment practices and working conditions, including sharing this guidance document with them.



EU/ECHO/Oleksandr Ratushniak

Mayorsk, Ukraine

Overall, we recommend our business partners to liaise with or join industry, civil society or government supported initiatives as well as organisations like the IOM providing immediate support to Ukrainian workers. They can also support with language issues, grievances, remediation and provide information on the displacement context, diversity, and intercultural communication.

We will regard the factory, farm or service provider as not committed to following the action plan if any of the DON'TS are actioned. We are keen to work collaboratively to support all those in our supply chain to respond effectively to emerging risks displaced, so we would appreciate any updates on your operating context in relation to the conflict to assist in closely monitoring the situation.

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For human rights, for better business

ETI is a leading alliance of trade unions, NGOs and businesses, working together with key stakeholders to promote practical solutions to end the abuse of human rights at work.

Our vision is a world of work that protects human rights, ensures dignity for all, provides opportunity and is free of exploitation and abuse.

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