
STANDARDIZING DATA COLLECTION ON FORCED LABOR: BENCHMARK OF PRACTICES AND GAP ANALYSIS

Report
May 2025

**TECH
AGAINST
TRAFFICKING** 

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I. ACKNOWLEDGMENTS

ABOUT THIS REPORT

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This research was made possible with the support of Amazon. The views expressed in this document do not necessarily reflect the views of Tech Against Trafficking's members or the members of BSR, including Amazon.

This report is intended for a broad range of stakeholders working to strengthen human rights due diligence on forced labor in global supply chains. These include human rights practitioners and responsible supply chain professionals at global companies, supply chain data service providers, policymakers and civil society organizations.

ABOUT TECH AGAINST TRAFFICKING

Tech Against Trafficking (TAT) is a coalition of leading technology companies collaborating with global experts to help eradicate human trafficking and modern slavery using technology.

Founded in 2018, TAT's founding members include Amazon, Google, HPE, Meta, Microsoft, and TikTok. TAT supports the anti-trafficking field by tapping into these companies' technical expertise, capacity for innovation, and global reach. Together, this group works with anti-trafficking experts to identify and scale promising technologies and address the misuse of technology to facilitate human trafficking.

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II. OBJECTIVES AND METHODOLOGY

OVERVIEW

Governments and policymakers are seeking to implement effective laws and enforcement mechanisms to prevent, detect, and address forced labor. Against this backdrop, companies are prioritizing the mapping of their supply chains to understand where forced labor may be occurring within their complex and often fragmented global operations.

Auditors, third-party technology solution providers, and civil society organizations support various research and initiatives to identify risks of forced labor and scrutinize the effectiveness of company policies and processes in addressing those risks. However, Tech Against Trafficking [research](#) published in 2024 found that approaches to collecting forced labor risk management data are generally not aligned across the ecosystem.

In collecting information of forced labor risks, most global businesses seek to align with the [ILO's forced labor indicators](#). However, significant variation in interpretations – as well as ambiguities and inconsistencies in data collection protocols – undermine the ability to share and aggregate data across different parties and overwhelms suppliers beyond Tier 1, making it especially challenging for them to provide accurate information.

Table 1: Overview of TAT multi-year forced labor supply chain data program

Objectives	Outcome
1. Enable a level-playing field and reduce subjectivity in categorizing risks of labor exploitation in supply chain, and make data more interoperative and shareable	A data ecosystem where all actors engaged with supply chains allocate more time on data analysis / effective mitigation, rather than data acquisition
2. Understand the role that technology can play in federating fragmented data sets	

Building on previous research efforts and findings, the TAT team launched a second phase of its forced labor supply chain data program in April 2024 to gain deeper insights into the current landscape of data collection practices by private sector actors. The objectives of this research were to understand:

1. Current efforts and challenges in collecting forced labor data points across private sector operations, including to inform an accurate and dynamic picture of forced labor

2. Key quantitative and qualitative data points collected by different businesses across sectors and geographies, with a focus on desktop assessments (i.e. self-assessment questionnaires (SAQs), or industry questionnaires)
3. Opportunities for greater harmonization of data collection efforts

This benchmark represents a first step toward understanding how quantitative and qualitative forced labor indicators are translated into data collection exercises. We believe that greater alignment in these practices will lead to improved interoperability and more effective data sharing. This, in turn, enables more time and resources to be allocated to meaningful human rights due diligence, with the ultimate goal of supporting workers and rightsholders affected by forced labor.

Building on this in-depth analysis, Tech Against Trafficking will run a third phase of the program to design and build forced labor data standard and protocol in 2025–2026.

Table 2: Phases of TAT forced labor supply chain data program



WHY DOES THIS MATTER?

It has become clear through TAT’s engagement with companies from across sectors and a variety of stakeholders that more action is needed to strengthen understanding of and harmonize practices on how data is collected and shared on forced labor:

- **There is a lack of clarity about what constitutes forced labor, and the data that underpins its assessment.** The [11 ILO forced labor indicators](#) remain the go-to framework of reference for businesses to assess forced labor across their supply chains; however, there are still significant ambiguities regarding definitions, thresholds, and how these translate into proxy data points for business and other actors.

- **Lack of standardization is hindering effective analysis and mitigation action.** Inconsistent definitions, indicators, and data formats make it difficult for companies and other actors to compare, aggregate, and draw meaningful insights across datasets. Moreover, datasets are often not shared among the various actors, which limits the visibility into what data exists and the type of information which can be aggregated and analyzed meaningfully.
- **Data collection efforts are duplicative and in need of harmonization.** The 11 ILO indicators have been translated into hundreds of different questions in company self-assessment questionnaires, third-party audits, and worker voice surveys. Companies and third-party providers, such as social audit firms, are asking similar yet different questions on forced labor. This results in duplicated time and effort for many business players, including suppliers. There is a need to streamline efforts and reduce redundancies so that resources can focus on meaningful due diligence in high-risk areas. This begins with a clear understanding of what information should be collected by business actors and how.
- **There is limited understanding about the effectiveness of the information collected on forced labor.** There is an absence of research or testing about whether the questions currently asked as part of self-assessment questionnaires, audits and other data collection methods effectively signal the presence of forced labor.
- **The current data ecosystem is extractive.** The current forced labor data collection system is top-down, with global businesses requesting significant amounts of information from their suppliers. When forced labor is identified, the prevailing response is to blacklist suppliers as non-compliant. This, coupled with buyers' lack of willingness to engage with the situation and share responsibility for remediation, discourages suppliers to disclose information. There are few incentives or rewards in place to encourage transparent data sharing between brands and suppliers.

METHODOLOGY

Our research focused on five ILO indicators: abusive working and living conditions, debt bondage, restriction of movement, retention of identity or working documents and withholding of wages. These are commonly considered as main red flags for potential labor grievances and were identified by selected businesses as indicators for which additional clarity and guidance would be beneficial. To obtain insights on these indicators, the Tech

Against Trafficking team conducted research and gathered input from anti-trafficking experts and practitioners across three main phases between June 2024 and March 2025:

Table 3: Research Phases

	Activity	Timeline	Description	Participants
1	Cross-sectoral study on ILO indicators	July–September 2024	Stakeholder interviews to understand current efforts and challenges in collecting forced labor data points across private sector operations	16 interviews conducted with civil society organizations (2), intergovernmental organization (1), multinational businesses (5) from logistics, retail, tech, transportation sectors, manufacturers (2) and supply chain data service providers (6)
2	Multi-stakeholder workshop on forced labor data points	November 2024	Workshop to map forced labor data points during the 2024 TAT Summit in London	45 participants from various sectors and civil society, including experts with lived experience
3	Focused benchmark pilot of forced labor data points	January – March 2025	Benchmark study to map forced labor proxy data points collected on selected ILO indicators in desktop assessments	Selected corporate suppliers

III. CONTEXT

THE ILO INDICATORS IN THEORY

International human rights laws provide the basis for definitions on slavery, forced labor, and human trafficking. While these concepts overlap in practice, there are some differences in how they are defined and understood. Domestic and regional legislation have adopted a mix of these terms, with “forced labor” the most applied term to describe situations of exploitative practices within business operations and supply chains.

Forced labor definition

All work or service that is exacted from a person under **the threat of a penalty** and for which the person **has not offered themselves voluntarily**.

ILO Forced Labour Convention (No. 29), 1930

Forced labor is defined in the International Labor Organization’s (ILO) [Forced Labor Convention \(No. 29\), 1930](#). According to the definition, forced labor involves two elements:

- **Involuntary work:** Any work undertaken without the free and informed consent of the worker;
- **Coercion:** Refers to the means used to compel someone to work without their free and informed consent.








Involuntary work, in and of itself, is a necessary but insufficient condition for forced labor. It must be coupled with coercion in order for it to constitute forced labor.

To support the identification of forced labor, the ILO has developed a set of 11 [forced labor indicators](#) which signal the presence of involuntary work and coercion (see Table 4). Indicators can be present at any stage of the employment lifecycle, including during recruitment, employment, or at the time of desired separation.

While these indicators were originally designed with law enforcement agencies in mind for investigative purposes, they have become the main framework through which private sector actors structure their data collection to identify and determine actual or potential instances of forced labor. There is a lack of clarity, however, on the quantitative or qualitative proxy

data points¹ collected by private and public sector players that underpin these indicators (see examples in Section IV).

Table 4: List of ILO Indicators

	Abusive working and living conditions		Isolation
	Abuse of vulnerability		Physical and sexual violence
	Debt bondage		Retention of identity documents
	Deception		Restriction of movement
	Excessive working hours		Withholding of wages
	Intimidation and threats		

Source: ILO; indicators in **bold** denote those in scope of this benchmark

THE ILO INDICATORS IN PRACTICE

Self-assessment questionnaires and physical social audits – either at an industry level or a company level (e.g., amfori BSCI, SA8000, Sedex SMETA, RBA VAP) – continue to be the main vehicles through which businesses collect data on forced labor from their first tier of suppliers. Worker voice data is gaining traction; yet there is an absence of a clear picture of how this information is fed into businesses' risk assessment efforts.

Most of these data collection platforms integrate ILO indicators in their assessments, standards and audit frameworks, although there are significant differences in the level of detail requested and the language used. Audit frameworks and self-assessment questionnaires (SAQs) do not align with each other and remain fragmented. Currently, there have been limited efforts to conduct harmonization across platforms.

¹ A proxy data point refers to an indirect measure used to represent a variable that is difficult to observe or quantify directly, in this context, forced labor.

IV. BENCHMARK AND ANALYSIS

BENCHMARK

Tech Against Trafficking's benchmark analyzed proxy questions related to the five selected indicators commonly used in company and industry self-assessment questionnaires to gather information from business partners on forced labor. The aim was to assess how harmonized these proxy data points are across the ecosystem, as well as to identify ambiguities and barriers to interpretation for businesses.

Key trends that emerge from the benchmark include:

- Certain ILO indicators are more ambiguous than others for business; for example, abusive working and living conditions, and debt bondage lack clear definitions and are subject to arbitrary interpretation
- The level of detail and focus of questions on indicators vary considerably, with some questions focusing more on company policies and management systems (e.g., "does your company have procedures to ensure that freedom of movement is not restricted?") and others on situational risk indicators (e.g., "are your workers free to leave the premises after working hours?")
- Terminology and language on indicators differ significantly
- Most questions are binary, offering only a "yes/no" answer, with little or no room to understand the rationale for business processes and practices (e.g., security risks)
- Multiple questions (usually between 2-5) are asked for each ILO indicator
- Legal requirements are often referenced with no further explanatory context

Table 4: Benchmark of sample questions and proxy indicators on selected ILO indicators

ILO Indicator	Sample questions in company / industry self-assessment questionnaires	Example proxy qualitative data points	Example quantitative data points	Ambiguities for business to assess forced labor
Abusive working and living conditions	<ul style="list-style-type: none"> - Is relevant accommodation provided by the company meeting relevant housing standards and acts? - Is the facility in non-compliance with any legal requirements for Health & Safety pertaining to non-production workers and/or sub-contracted workers? - Are all relevant government health and safety certificates or permits, insurance policies and any relevant correspondence or documents for the accommodation the company provides in order? Please identify and report any irregularities. - Are dormitories and canteens kept separate from the production area? - Do workers staying in an accommodation or centralized room in a form of a dormitory have the following [Yes / No / NA] <ul style="list-style-type: none"> <input type="checkbox"/> One rest area <input type="checkbox"/> Bedroom <input type="checkbox"/> One kitchen area <input type="checkbox"/> Bathroom and toilet (whether separated or together) with a ration of 1 bathroom and toilet per 6 employees) <input type="checkbox"/> Fan for each rest areas, dining area and bedroom <input type="checkbox"/> Lamp for each rest area, dining area, bedroom, kitchen area and bathroom and toilet <input type="checkbox"/> One area to hang out clothes <input type="checkbox"/> One first aid kit <input type="checkbox"/> Dustbin 	<ul style="list-style-type: none"> Worker testimonials on living conditions Photo evidence of dormitory conditions Presence of basic amenities like clean water, heating, or sanitation 	<ul style="list-style-type: none"> Number of workers per bedroom Number of toilets per workers Square meters per person in dormitory Health and safety data 	<ul style="list-style-type: none"> - There is a lack of clear definition about what constitutes "abusive working conditions and living conditions." This varies considerably according to geography and local context. - An assessment of both working and living spaces is in scope of this indicator, but it is unclear whether additional questions are needed by businesses beyond existing health and safety checks. - This indicator is difficult to obtain clarity on without in-person verification.

Debt bondage	<ul style="list-style-type: none"> - Are workers required to pay fees to your company or recruitment agents or any third parties, during the process of recruitment for your company? If yes, is there any plan for reimbursement? - Are workers required to deposit money or personal documents like passports, birth certificates, etc. to your company or recruitment agent or any third parties throughout the employment? - Are any monetary deposits required of workers upon hire? - Are recruitment fees and related costs by workers in line with legal requirements? - Can workers who owe debts to the facility and / or a third party freely leave their jobs? 	<p>Worker testimonials relating to recruitment experience</p> <p>Employment terms relating to deductible fees</p> <p>Descriptions of company policies regarding recruitment and due diligence on third-party agencies</p>	<p>Number of workers hired by a third-party agency</p> <p>Number of workers with outstanding debts</p> <p>Average amount of recruitment fees paid per worker</p> <p>Amount of repayments related to recruitment fees repaid by company</p>	<ul style="list-style-type: none"> - The payment of recruitment fees is most closely related to the debt bondage indicator but is not an indicator per se. - Several ambiguities remain for businesses in this area: <ul style="list-style-type: none"> - How the interlinkage between recruitment fees and debt bondage be assessed, especially when certain fees are permitted in certain jurisdictions? - Does a situation of forced labor exist where workers are forced to pay recruitment fees but do not incur "debt" as a result? - Is there a certain threshold at which recruitment fees constitute forced labor in countries that allow these fees to be charged? - Despite most interviewees indicating that a situation of debt, alongside the imposition of recruitment fees on a worker, constitutes a primary red flag pointing to a potential labor grievance, there is no standardization of the indicators collected (i.e., on the presence of recruitment agencies, levels of fees charged, indicators of debt).
Retention of identity documents	<ul style="list-style-type: none"> - Do workers keep all of their original personal documents (such as birth certificates, passports, worker permits and ID cards)? - Have workers been denied access to any of their original personal documents (such as birth certificates, passports, work permits and ID cards) when they need them? 	<p>Worker testimonials relating to ID document</p> <p>Company access policies, including for third-party agencies</p>	<p>Percentage of workers holding own documents</p>	<ul style="list-style-type: none"> - In theory, straightforward yes / no answer. However, additional context may be needed to understand whether there is a security rationale for employers keeping hold of passports and documentation. Most SAQs do not provide the opportunity to highlight additional context.
Restriction of movement	<ul style="list-style-type: none"> - Does your company have procedures to ensure freedom of movement is not unreasonably restricted? 	<p>Locks, fences, or other physical barriers present a work sight or</p>	<p>Curfew hours imposed (if any)</p>	<ul style="list-style-type: none"> - In theory, these questions require a straightforward yes / no answer. However, additional context may be needed to understand whether security or safety

	<ul style="list-style-type: none"> - During working hours, are your workers required to obtain approval to seek medical treatment, go for a toilet break or drink water? - Are your workers free to leave work premises after working hours? - Does your company impose curfews at accommodation it provides? 	<p>accommodation with unjustified explanation</p> <p>Surveillance of workers' movements inside and outside working hours (e.g., camera surveillance)</p>	<p>Percentage of workers needing approval to leave premises</p>	<p>measures have been put in place to protect workers' welfare and other human rights (e.g., right to security), and not as a measure to limit freedom of movement.</p> <p>- Most SAQs do not provide the opportunity to elaborate on the context and provide additional information.</p>
Withholding of wages	<ul style="list-style-type: none"> - Are wages paid directly to workers' personal bank account which he/she has direct access to? - Are workers provided with pay slips that list all components of wages paid and/or deducted? - Is there any deduction from wages other than permitted by law for e.g., EPF, SOCSO, income tax, etc.? - Are the workers free from any financial penalties or penalty system? - Are wages are paid regularly, directly and on time and no part of the wages are withheld? - Are workers paid their full wages in a legally required manner? - Does the facility take any deductions from wages that are not in line with legal requirements? 	<p>Worker testimonials relating to wages</p> <p>Presence of arbitrary fines or penalties</p>	<p>Percentage of workers paid on time</p> <p>Average wage deductions per worker</p> <p>Percentage of workers with access to own bank account</p>	<p>- This indicator contains two elements: (1) wages paid on time, and (2) deductions. Therefore, it requires two separate types of proxy data points (i.e. frequency of payment and amount of deductions)</p> <p>- The term "withholding" is ambiguous for non-human rights experts,, for example HR teams who are likely to be involved in completing SAQs. Thus, such categorization often lacks the necessary granular examples.</p>

KEY TAKEAWAYS

1. **More clarity on thresholds for determining a risk, proxy data points and simplified language are needed to translate the ILO indicators into a business context in light of existing and upcoming regulations on forced labor:**
 - **The threshold for defining a situation of forced labor remains unclear for business actors.** The ILO itself recognizes that one or several indicators taken in isolation may not amount to forced labor and highlights that coercion and involuntariness are two simultaneous conditions for forced labor, yet businesses are left in the dark about how to make this evaluation.
 - **These thresholds matter in a context of existing and emerging regulatory frameworks specifically targeting forced labor,** including Section 307 of the U.S. Tariff Act, the Uyghur Forced Labor Prevention Act (UFLPA) and the EU Forced Labor Regulation (EUFLR). A lack of clear thresholds leads to varying interpretations and inconsistent implementation action in countries and regions with forced labor import bans, including the United States and the European Union, with unintended consequences for workers.²
 - **Experts have highlighted that three indicators—debt bondage, deception, and restrictions on freedom of movement—are present in most instances of forced labor in the supply chain.** Yet most businesses continue to collect data across all 11 ILO indicators.
 - **There is a need to define clear data points for certain ILO indicators – in particular abusive working and living conditions and debt bondage – where ambiguities remain.** Recruitment fees are connected to the ILO indicators of debt bondage and withholding of wages, but are not an indicator per se.
 - **ILO indicators and associated questions should be more clearly mapped to specific stages of employment i.e. recruitment, employment and termination** – as done by the ILO in a recent guide on forced labor prevalence surveys³ – to enable more targeted due diligence across these different stages.
 - **The language of the ILO forced labor indicators needs to be made more accessible beyond sustainability professionals.** Reframing and simplifying common concepts and providing more guidance and training so they can be

² See for example, Hinrich Foundation, *Impact of US anti-forced labor laws on Vietnam's textile industry*, [The impact of US anti-forced labor laws on Vietnamese SMEs | White paper | Hinrich Foundation](#).

³ ILO, *Harder to see, harder to count: Handbook on forced labor surveys*, [Hard to see, harder to count: Handbook on forced labor surveys | International Labour Organization](#).

understood by functions including procurement and human resources, and by workers themselves, is necessary.

2. Forced labor questions in company and industry self-assessment questionnaires are duplicative and not fit for purpose:

- **Self-assessment questionnaires** – both from individual companies and industry initiatives – **often include often overlapping questions** on forced labor indicators.
- **Binary questions on forced labor, which require a self-declaration from suppliers are of limited utility.** Questions on forced labor are often binary yes / no questions, which act as a tick box exercise.
- **While industry initiative questionnaires often request contextual information,** including worker demographics, country of origin and employment tenure, **this information does not routinely feature in company self-assessment questionnaires.** These quantitative and qualitative data points could be used as a first due diligence step to identify at-risk companies for forced labor, with enhanced due diligence and more detailed questions for higher risk companies.
- **Company self-assessment questionnaires do not regularly include questions related to conditions for sub-contracted workers and / on-site contractors,** who are most likely to be vulnerable to situations of exploitation and forced labor.
- **Emerging regulations on human rights due diligence and forced labor are driving an increase in information requests.** In the absence of standardized data collection, suppliers often face significant duplication—receiving the same forced labor questions from many customers, sometimes hundreds of times per year.
- **Rethinking forced labor data points in self-assessment questionnaires (SAQs) would benefit both buyers and suppliers.** For suppliers, it could reduce the time and resources spent on repetitive or duplicative questions. For buyers, more targeted questions could yield meaningful insights that support more effective analysis and focused due diligence efforts.

3. Alternative and less extractive data points should be explored to complement the ILO indicators and track improvement over time:

- **There is scope to think more creatively about additional data points, including publicly available collected by governments, which could be used to inform**

the forced labor risk picture. These may include information on businesses' financial health, satellite data, supplier sentiment or environmental degradation.

- **Less extractive data points can help shift the burden of reporting away from suppliers, while enabling buyers to process and analyze risk data more efficiently to inform timely due diligence actions.**
- **More guidance and research are needed to identify which data points are most effective** and at what stage of the human rights due diligence process they should be collected (e.g., at the desktop phase or on-site).
- **The current forced labor data ecosystem only tracks risk, and offers no way to measure improvement.** Alternative data points – including worker sentiment – could be explored to identify and reward improvements in supplier behavior and due diligence practices.

V. RECOMMENDED ACTIONS

Tech Against Trafficking's research has highlighted that the eleven ILO indicators still offer a useful blueprint for business yet:

- They remain imperfect for forced labor data collection efforts,
- Forced labor data points and data collection practices do not align across the ecosystem.

Company approaches to identifying and mitigating forced labor risks differ greatly from nascent to more mature, with an absence of a level-playing field across businesses to enhance data acquisition and granularity.

To address the limitations outlined in the report and achieve greater harmonization of data collection efforts, there is an urgent need to:

1. **Develop a single cross-industry standard on forced labor for business.** This standard should outline a menu of effective and streamlined data points for use at various stages of the due diligence process (e.g., desktop vs. on-site assessments), define key terms, and establish thresholds for triggering further human rights due diligence.

2. **Ensure the forced labor standard is adopted by governments, supply chain data providers and industry associations.** While there is recognition from business actors on the need to converge on forced labor proxy data points, these efforts require support and endorsement from industry and government actors. Adoption of a common standard on forced labor in global supply chains will promote consistency and streamlined effort to collect more actionable data.
3. **Explore complementary data points that are less extractive and less reliant on self-certification.** These can offer multinational companies an initial set of contextual factors for analysis while helping to reduce the reporting burden on suppliers.

As announced at the 2024 Tech Against Trafficking Summit in November 2024, TAT will lead on this data standardization effort over the coming year in partnership with stakeholders from civil society, governments, intergovernmental organizations and the private sector, and with input from workers and experts with lived experience.⁴

For multi-stakeholder collaboration (via Tech Against Trafficking)

- Pilot a multi-stakeholder data standardization initiative in 2025–2026 to:
 - o Identify a streamlined list of data points to be collected at each stage of the due diligence cycle (e.g., during SAQs and on-site assessments) and produce implementation guidance for businesses
 - o Design and validate a concrete list of non-extractive data points
 - o Define and simplify key concepts and provide additional guidance and training to ensure comprehension across business functions, including procurement and human resources
- Engage closely with policymakers, industry associations and identify opportunities for smaller businesses and business partners to review and validate the data standard, including the formats and processes for submitting information

For companies

- Review forced labor data points collected through human rights due diligence processes, including in self-assessment questionnaires, with the aim of assessing:
 - o The type and number of forced labor-related questions asked to third parties (e.g., in SAQs and on-site assessments)
 - o Opportunities to consolidate and/or harmonize questions related to forced labor risks

⁴ TAT welcomes input from stakeholders to build a standardization effort which will serve to deliver better and more effective due diligence – and ultimately better outcomes – for impacted rightsholders.

- Inclusion of contextual questions regarding worker demographics and the indirect workforce on site (if not already included)
- Opportunities to clarify and simplify key terms related to forced labor
- Engage with industry associations to identify opportunities to standardize forced labor data collection efforts at an industry level
- Register interest in participating in TAT's data standardization initiative

For governments

- Support and inform the development of a single cross-industry standard on forced labor for business
- Once finalized, promote the standard's adoption across government agencies—including customs authorities—and incorporate into existing corporate guidance on addressing forced labor in supply chains

For supply chain data service providers

- Consider adopting clearer thresholds for forced labor definitions by aligning with common standards across peer organizations
- Provide additional guidance on assessment questions to improve accessibility beyond sustainability professionals
- Eliminate redundancies and overlapping questions on forced labor in industry questionnaires and audit frameworks
- Engage with stakeholders—including workers, suppliers, and industry members—to assess the effectiveness of the forced labor data points collected
- Register interest in participating in TAT's data standardization initiative