



# An employer's guide to fair recruitment

November 2021



A powerful  
and balanced  
voice for business



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The Business Advisory Group to the Global Forum on Migration and Development (GFMD), endorsed at the 2015 GFMD Summit in Istanbul, brings the voice of business to the forum and to international debates on migration. Participation in the Business Advisory Group is open to all companies and business associations that share its goal: promote more transparent, effective and humane migration policies, taking into account labour market needs.

The Business Advisory Group on Migration is housed at the International Organisation of Employers (IOE), the largest network of the private sector in the world.

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**Business  
advisory group**

on  
migration

**November 2021**

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## Executive summary

Recruitment is the crucial element for businesses to maximize their most important investment: people.

By using a fair, inclusive, and structured approach to the ways in which a business can identify, interview and employ talent, a company not only avoids the pitfalls and costs associated with a wrong employment decision, but also avoids the harm and liability that can come through associations with forced labour and discriminatory abuse.

This guide explores the steps of a fair recruitment process, identifies good practices that a company of any size can take to ensure a good recruitment decision and looks at the pitfalls that can frustrate that outcome being realized.

Being seen in the market as a “good employer” starts with the way in which a talent is recruited. This in turn, can lead to lower employee turnover and the retention of key skills, thereby adding to improved performance and overall business competitiveness.

The Guide also acts as a resource for Employer and Business Membership Organisations (EMBOs) in helping to upskill recruitment practices amongst their members, improving productivity outcomes and helping avoid adverse harm to people in line with the expectations of the UN Guiding Principles on Business and Human Rights. It also sets out some other ways in which these organisations can help improve their domestic recruitment market, as well as identify other resources that can be called upon.

## Introduction

Discussions around forced labour and modern slavery, both at the national and international level have created an increasing focus on fair recruitment practices by business.

These discussions tend to be focusing on the employment of migrant labour and concerns around their exploitation. Whilst those concerns are real, fair recruitment also needs to be applied to all hiring of employees, both local and migrant.

Sustainable Development Goal 8.7, the ILO's fair recruitment tool kit and forced labour protocol, coupled with a range of national modern slavery regulations are all working to eliminate one of the results of unfair recruitment, namely, forced labor/modern slavery and to call to our attention wider worker abuse, such as discrimination, throughout the recruitment process.

However, fair recruitment processes are more than just about avoiding the negative impacts of unfair recruitment, important as it is. It is about optimizing one of the most important investments a business makes and ensuring that the investment is made in the best possible way by attracting the best possible candidates. Employers are not often aware of the costs of poor recruitment practices. Those costs can be seen reflected, at least in part, by high employee turnover, low productivity, and an inability to attract the talent they need vis-à-vis other employers in the market.

The UN Guiding Principles on Business and Human Rights (UNGPs) call on businesses to respect human rights, identify, prevent, mitigate, and avoid repeating harm to people and provide remedy to those who have been negatively impacted. The obligation to respect those rights, applies to the whole employment experience, from recruitment to the person's departure and everything in between.

Fair recruitment is the starting point for ensuring that, as an employer, you are respecting human rights, not only by avoiding harm but, by taking a "rights-based" approach, you are maximizing the "truth" that the recruitment of the best people is a key asset for any business. This should be done in a way that ensures that a person you employ is able to fully apply the skills, knowledge and experience they bring to the role, unencumbered by debt or fears around their ability to fully function within the company and community. A worker with any of the attributes of forced labour attached to them will not be able to deliver to their full potential. Therefore, it makes sense that the recruitment processes used enable the best outcome for the company and the person recruited.

This guide is designed to help Employer Organisations (EOs) and their members to better understand the elements of a successful and fair recruitment process, so that they can enhance their own member recruitment processes.

It also encourages EOs themselves to model the fair recruitment process in their own hiring.

### No one size fits all

Not all recruitment is the same. Different roles require different approaches, but that does not mean only some should be fair. Fairness needs to be inherent in any process used.

- a) **Use of third parties:** Some employers opt to pass the actual recruitment off to third parties on a fee basis. At certain managerial levels this can involve well-known and highly regarded recruitment agents who undertake the sourcing of talent. In other cases, which have been used to recruit large numbers of unskilled or semi-skilled workers involved in labour migration,

the employer often uses labour brokers in the sourcing country to attract and process the employment of workers before transporting them to the employer's location. In such instances, the actual employer plays almost no role in the worker's employment until they arrive in the country.

In such instances, ensure that, as the eventual employer, you have an agreed understanding in a service contract as to how the third party is to act with regards to how it will identify and recruit workers on your behalf. This should align with the fair recruitment practices in the guidance below.

The impact of this process differs widely. In the first scenario, the employer assumes the costs of the process, as it is paying the third party to identify talent. If the talent themselves have decided to pay to be in the third parties' list of possible candidates, this can start to raise red flags on recruitment costs which will be addressed later in this guide. These candidates then come into a pool from which the employer can then start the actual recruitment process with those selected.

Under the second scenario, the actual employer has limited line of sight as to how the workers recruitment is undertaken. The recruiter can then potentially require candidates to pay certain costs associated with the process without the employer being aware. Such "blindness" raises a number of red flags around the amount and the impact of the recruitment costs being borne by the worker, as well as possible corruptive practices around a worker "paying" for the job.

Both instances create human rights risks to workers, and therefore the employer needs to ensure that how it uses third parties is in line with its human rights obligations. It cannot "contract" "those responsibilities to others and then assume that it has no responsibility.

- b) **Direct Hiring.** One way some employers look to avoid the risk of using third parties, or because they prefer to be directly involved, is by taking explicit responsibility for the entire process from search to short-listing to the interview to employment. Whilst this does give this element of control that is not always present when third parties are used, it can also hide exploitation of people that the employer needs to be aware of and avoid.
- c) **Third party labour providers.** Another approach is to contract out the work to be done and who will do it to a third party. This was most common with regards to services like facilities management, cleaning, catering, security, etc. These "non-core" "activities can then be placed elsewhere and free up the employer to focus on its key business. That is now changing as the world of work changes, and more businesses are looking to use the advantages from contracting out even "core" work to workers globally, thanks to improved connectivity. These workers would not be "employees" and the companies could avoid any employment related costs including recruitment.

In response to this trend, there have been several initiatives taken by governments and national courts to address this practice, ranging from restricting any direct employment relationship, to rulings that simply determine a contracted worker to be in fact a direct employee. Further developments are expected in this realm, therefore, if an employer does have such workers in their business, then they also need to fully understand how such labour was employed and the conditions under which they work. Failure to do so can open the

company up to allegations of engaging in abuse of labour, therefore acquiescing in the violation of the contract worker's human rights.

Recruitment therefore requires a lot more attention than it has received in the past, as it relates to all aspects of an employer's work force and to the labour they contract to do work. The aim, therefore, is to get it right each time.

### **How to ensure a fair recruitment process?**

First, we need to think about what "fair" means.

Any fair process should be guided by some key considerations.

- You are making an investment and creating what could be a long-term relationship, therefore, you want to make sure you get the best results from it.
- You want to ensure that you get the best workers available, so your process should ensure that you cast the net as wide as possible to capture that talent. You want to avoid legal and reputational risks associated with unfair recruitment processes.
- You need to think about how you are viewed as an employer. Are you seen in the marketplace as a good place to work? What values do you have that make you attractive to possible employees?
- What has been your labour turnover? Is it too high and people quickly exit your business, or is it too low and are people staying too long negatively impacting staff promotions, new ways of thinking, innovation etc.? Why is that?
- What does the national law say about recruitment? For example, what is the legal age for employment? What restrictions apply as to when certain people can work? What types of work are legal? For instance, short term, casual, on call, part-time etc.
- What does national law say about recruitment fees? Some jurisdictions allow the charging of certain fees to a prospective employee. What are they? It is important to remember that in terms of fair recruitment as an employer, you do not have to acquiesce to the charging of such fees. You are not obligated to avail of what the law allows, given you wish to avoid harm such as, debt bondage which impacts upon the person you hire.
- What are your demographics? Do you employ one type of person over another? Why is that? What does that tell you about the aim of employing the best person?

A fair recruitment outcome is about employing the best person available to do the job based on their skills, knowledge, and experience and not based on any legally prohibited grounds of discrimination. The latter is commonly based on the ILO's Discrimination (Employment and Occupation) Convention of 1958 (Convention 111) i.e., race, colour, sex, religion, political opinion, national extraction, or social origin.

However, regard must be first given to national law as well company policies which have, since 1958, expanded upon the grounds of what is prohibited. It is now not uncommon to see issues such as sexual orientation and sexual identification being included by companies as grounds on which they will not discriminate, to achieve the best possible outcome from the recruitment process.

Ensuring the net is as wide as possible by not discriminating at all is the best practice.

This is also important from a liability perspective, as most complaints about selection rest on allegations that non-selection is attributable to prohibited grounds, rather than on the inability to do the job. Avoiding legal risks and damage to your image as an employer is best done by applying a fair process.

### **Good planning**

Recruitment is a serious business, therefore having the right plan in place is key to its success. This requires detailed action at each step to prevent the process from going off track.

Decision to recruit: Why do you want to make a recruitment decision? Is the role needed or could existing capacity be reallocated? Just because a person leaves or you think a new role is needed, there is a need to apply some real thought as to whether you should actually do so. Often overlooked when a company takes a decision too quickly, is whether there are advancement opportunities for someone internally.

Ultimately, this means concentrating on the selection criteria you are going to use. Start with your company's values and stated position on Human Rights. Then turn those into the behaviors you would want to see in an applicant and express them in the selection criteria and the vacancy announcement. If you can, make sure that the attributes are also reflected in the skills, knowledge and experience criteria.

Create the right vacancy announcement: Use inclusive language as you write the announcement. Avoid gendered connotations such as "strong" for men or "empathetic" for women. Try and find neutral word to express the job tasks. Use "person" instead of "he" or "she", "salesperson" instead of "salesman" and avoid any language which shows the desire to exclude individual based on prohibited grounds. For instance, language such as "heavy lifting required" may serve as means to exclude women.

This may seem self-evident, but many allegations of discrimination can be traced back to words used in a vacancy announcement. It is also helpful if the author of the announcement gets inputs from others on how it is worded, to help ensure that potential candidates are not consciously or unconsciously excluded by poor word choice.

If you are using third parties for the recruitment you need to review the vacancy announcement, see, and approve it before it is posted.

Create the position description: Based upon the work done to create the vacancy announcement, the position description needs to follow the same rules around language use and provide a full description of the job tasks and attributes of the role, including an explanation of company culture expectations. Consult with others internally on the design and invite them to suggest clarifications or additions to the text as needed. This text should assist in establishing the questions for the actual interview and help to keep the process focused on skills, knowledge and experience. This document can also help if you are looking to use the job evaluation tools to place the role within the company's salary structure or for comparison with the salary survey information you may have access to.

In addition, this document helps to create a diverse team with a range of demographic features (race, ethnicity, gender, etc.) and personality differences to keep refreshing the business and avoids simply recruiting replicas of the recruiter.



Place the vacancy announcement in the right place: Where will the vacancy be posted? Will it be visible to as many candidates as possible? You may need to use a variety of platforms and avoid using solely those that may be dominated by individuals pertaining to a particular group covered in the prohibited grounds. Again, know and approve the placements made on your behalf by third parties.

How does a person apply? Increasingly, vacancy announcements and application platforms are online. Companies typically do not want to deal with paper-based applications. That is understandable, but it is important to remember that not all candidates may have access to such technology. By not allowing a variety of means through which to apply, you may be excluding quality, competent good and capable candidates.

Selection of candidates: Hopefully, the vacancy announcement has brought to you a rich list of prospective candidates. This is where the employer should now take the lead and ensure that the process used directly or by third parties continues to be fair.

a) *Who gets the replies?* Will the person writing the vacancy announcement also be the one to make the selection and fill the position? Or should an intermediate step be used first?

We all must accept that we have biases, both conscious and unconscious. This step is where the employer needs to do the best they can, to control for such bias. One way to do this is to have the applications reviewed by another person or even a small group, before the actual recruiter sees them.

Another way is commonly referred to as “blind hiring”. This process involves removing the demographic information an applicant provides before they are put forward for selection to interview. This may include removing photos, names, location, and any other physical attributes etc., basically anything that is unrelated to the applicant’s ability to perform the task.

b) *Who creates the list for interview?* This should be a collaborative effort based on the above assessment. Again, the list needs to deliver on the goals of the recruitment policy which has to be an inclusive process and deliver candidates as diverse as possible.

Given developments in technology, especially Artificial Intelligence (AI), some businesses are using AI algorithms to screen applications as they come in, especially when a person applies online. This appears to be an efficient and time-saving approach. However, at the same time, the algorithm may be missing some key information and, excluding qualified candidates, thereby raising concerns that the algorithm used is discriminating against a person. Whether that is on prohibited grounds or not is an easier claim to make than it is for the employer to defend. Be aware of the risks of its use and do your due diligence with the AI provider to ensure that you are not, by its use, losing sight of good candidates or creating a legal risk.

A tell-tale sign of AI use is that rejections are almost immediately sent back to an applicant. Whilst this appears to be fast and efficient, it will likely be viewed negatively by the candidate and build a belief that the application was not properly considered and may encourage complaints. It can also instigate a conversation on social media on how you are viewed as an employer.

The interview processes: The interview process needs time to be properly planned as it is important that there is consistency between interviews with different candidates to give a real “apples to apples” assessment of their suitability for the role. It also reduces the chances of bias coming into consideration. The more objective the process is, the less chance of the employer being accused of

creating an unfair process and the better prepared an employer can be to refute any such allegations raised.

Ensure that those involved in the interview process are trained properly in all aspects of the interview process, addressing issues of conscious or unconscious bias and interview techniques and the restrictions around discrimination.

Fair recruitment requires the employer to have people who know how to properly undertake the process. This helps ensure the best outcome for the company as well as helps ensure that the interviewees have no grounds to complain about how they were treated in the process or about the outcome should they be unsuccessful. Questions that should never be asked include, “When were you born?”, “How old are you?”, “Where were you born?”, “Are you married?”, “Do you have children?”, “Do you plan on having children?”, “What religion are you?”, etc.

If a question does not relate to the role, the best thing to do is not to ask it.

Create an interview script for all to use that focusses on assessing the candidates’ relevant job-related skills and competencies, rather than simply relying on their CV and the interviewer’s gut feeling. Given the nature of the vacancy announcement, a company may want to go further with candidates and have them undertake, cognitive ability assessments and personality questionnaires. These should always measure the skills, behaviours, and competencies that are your actual selection criteria.

The interview script helps keep the interviewers focused on exploring the real abilities of the candidate. Having prepared questions, drawn from the position descriptions, provides some protection against the claims of discrimination as you can prove that each applicant was asked the same questions. The interviewers need to flag issues in the responses given if they believe it raises issues requiring further investigation beyond the set questions asked. That should be discussed internally and may require the formulation of additional questions that again should be explored with all the other interviewers.

Ask effective questions that seek the answers you need around the applicant’s skills knowledge and experience. Use open-ended questions to elicit a response and give the candidate the time they need to answer.

Assemble a diverse group of people to conduct the interview. This group should include any under-represented group in your work force, and they need to be trained on interview questioning techniques and protocols to ensure that they interview either together or separately in the same way. Ensure you allow sufficient time to conduct the interview properly. Block the time, so that you are not under pressure from other commitments.

If you are using testing to assess the application of skills claimed, the same rules around the objectivity must apply. All candidates should do the same test and be given the same amount of time to complete the task. However, it may be necessary to make accommodations for persons with disabilities, be it cognitive or physical. Here, you want to know if they can do the work. The “how” of how they do it, is a secondary consideration and subject to rules in many jurisdictions vis-à-vis reasonable accommodation” by the employer for persons with disabilities.

Provide suitable and private spaces for the interviews. Even if a person is interviewing alone, it is a good practice to have another person present. This helps in notetaking and creates a corroborating witness to what has occurred. Detailed notes of the responses to interview questions should be taken.

Save documentation and keep it safe and secure and this would include:

- The vacancy announcement (internal or external) and position description.
- Any materials submitted by the applicant (a clear vacancy announcement can help limit extraneous material being submitted). This will require information from any third-party recruiter used in the process. Your rights to that material need to be made clear before you enter any contract of services with them).
- The questions asked and all notes of responses (this would include all notes of interviewers if a panel was used).
- Any ranking information of candidates based on the interviews held.
- Any testing result completed by a candidate as well as details of the test itself.
- Any materials used for making the final selection.
- Any other information seen as relevant or required by law.

The retention of this information may be required by law as to the time for which it should be retained. As it is personal information, candidates should be told the legal basis upon which it is being held, including details related to confidentiality, data security and access. Again, the law may require that the information be destroyed after a defined period. If the law is silent on this, it makes sense to establish a company position on this as part of a wider privacy policy and refer to that process at the interview. It will be necessary to return any original items submitted by the candidate like qualifications etc., but copies should be kept.

This may appear burdensome but an allegation against an interview process may arise after some time has passed. If you do not have this information, your defense to any allegation is severely weakened, especially, if the people who were involved are no longer available.

Reference and background checks: Where you ask for references, ensure that you clearly include the candidates' agreement for you to contact them. References should be checked. It is important though, to bear in mind that the references or referees given are likely to be the ones the candidate is confident will deliver a positive response, therefore, a set of standard questions should be put that are aimed at eliciting the information required. A good starting question could be "Would you ever re-employ the person again?".

In some countries, employers are wary of giving references to previous employees given the possibility of liability attached to what they say, and the reliance placed on their comments by the prospective employer. In those instances, they may restrict any comments by persons who previously worked with the candidate and simply offer a certificate of service to show the years of employment and the tasks undertaken with no other comments or opinions about the candidate's character or attributes.

There are also jurisdictions where background checks and drug use screening are a part of the process. These checks look to ascertain any criminal convictions. These checks and drug screening should only be undertaken after an offer of employment is made but that offer of employment is subject to the person satisfying those checks. Make sure they are done in accordance with any legal requirements and, should a conviction be identified, first assess how relevant that conviction is to the job under

consideration and what risks such a conviction pose. In short, do not simply shut the door on the candidate based on a contrary finding.

Take a decision: Ideally, this should be done quickly whilst all the discussions are still fresh in the mind. If a panel was involved, get their feedback and how they would rank each of the candidates judged against the questions given, the vacancy announcement, the position description, and the interview notes and, if needed the test scores. Be clear as to what those ranking criteria are (keep them) and all must apply the same for each candidate. Retain objectivity and don't allow biases to creep back in.

Inform all the interviewed candidates of the outcome. This can be an uncomfortable task and at times unsuccessful candidates will contact you wanting to know why they were not selected or some feedback to help them with other opportunities. This should be avoided. With any information shared with unsuccessful candidates do not go into details. Simply thank them for their application (and interview if they had one) and say they were unsuccessful and wish them well for the future.

A company should continuously review their hiring practices to ensure they remain fair to all applicants.

Fair recruitment practices can help ensure that the company is hiring in an inclusive way, and by doing so it also improves the performance of the organisation.

### **Modern Slavery/Forced Labour**

A key purpose of reinforcing the fair recruitment practices is to ensure that, as an employer, you are not creating situations of forced labour where workers are kept in conditions equating with slavery. Several companies are being guided by a set of Priority Principles developed by the Consumer Good Forum that require:

- *Every worker should have freedom of movement* i.e., a worker's ability to move freely should not be restricted by their employer through such actions as physical restrictions, abuse, threats, and retention of passports/identity documents.
- *No worker should pay for a job* i.e., all fees and costs associated with the worker's recruitment and employment should be paid by the employer and not the worker.
- *No worker should be indebted or coerced to work*, i.e., workers should work freely, have agreed on their terms and conditions of work with their employer before starting to work and are paid regularly and correctly.

Others refer to the ILO definition of recruitment fees and costs<sup>1</sup> to guide them on what costs of employment should be borne by the employer.

The aim of either approach is to ensure that the employee is not placed in a condition akin to forced labour by the recruitment process.

Increasingly, the governments are regulating this area in order to prevent forced labour as a practice in company operations and supply chains and to prevent goods being imported that have been made with forced or child labour. This is, therefore, a compliance matter for companies covered by such

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<sup>1</sup> [https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms\\_740400.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms_740400.pdf)

laws, but it is also covered by the UN Guiding Principles on Business and Human Rights which call on companies to “respect” not only human rights as covered by the Universal Bill of Human Rights but also by the ILO Declaration on Fundamental Principles and Rights at Work which looks to provide for:

- the freedom of association and the effective recognition of the right to collective bargaining
- the elimination of all forms of forced or compulsory labour
- the effective abolition of child labour and
- the elimination of discrimination in respect of employment and occupation

As mentioned above, some countries legally allow the charging of workers fees. In fact, to some workers, paying fees has become an accepted practice and can be wary of jobs where they are not asked to pay. Firstly, not charging a worker fee is not unlawful. Just because a company or third-party recruiter can charge does not mean that they should. Secondly, the company needs to invest some resources to explain its non-fee approach to prospective workers and, if using third parties they need to ensure that workers fully understand what is required and check that what they have stipulated is occurring.

If an employer decides to allow fee charges under the law, they still have the obligation to ensure that such fees do not have the effect of placing a worker so charged in a condition of forced labour. That can only be done by assessing each case, as the impact of such fees can vary from worker to worker.

A finding of forced labour requires that it be remediated by the employer. For example, steps around allowing the retention of personal documents is one remedy and training supervisors on the proper treatment of staff whilst at work is another. When it comes to recruitment fees they should be repaid to the worker. If this occurs it should only be a one-off occurrence as it is hoped an employer would take immediate steps to ensure it does not happen again. Tools to help employers and workers in this regard are now available. The Principles and Guidelines for the Repayment of Migrant Worker Recruitment Fees and Related Costs is applicable in any instances of employees incurring recruitment costs and provides a step-by-step guide as how to give effect to this remedy.

### **A role for Employers and Business Membership Organisations (EMBOs) in Fair Recruitment**

Having successful members is a key to unlock a wide range of economic and social improvements and fair recruitment is a fundamental step in creating that success. This offers EMBOs a range of opportunities to assist their members. This can include fee-based services such as:

- reviewing and updating existing member recruitment processes
- training on fair recruitment principles based on this guide collectively or tailored for in-house delivery
- assisting in writing position descriptions and development of interview plans
- assisting in writing contracts of employment
- familiarizing members on legal requirements and court decisions impacting recruitment practices
- reviewing or helping in the creation of employer policies to align with fair recruitment expectations e.g., Human Rights Policy, non-discrimination policies, etc
- advising on inclusion of fair recruitment requirements in recruitment service contracts.

More generally:

- advocating for the non-paying of fees by workers to government
- promoting fair recruitment to members and other stakeholders
- engaging with recruitment agencies to explain fair recruitment practices and starting to move the market to an employer pays model
- engaging nationally with International Organization for Migration (IOM), ILO and other stakeholders seeking to establish a non-fee charging employment marketplace
- identifying those agencies that do not charge fees and creating a “bank” of recruiters that members could access. It can be done directly or with the help of members, and it should not infer any warranty as to their actual practices and members would still be required to undertake their own due diligence
- applying fair recruitment practices in the organisation’s own recruitment
- engaging with government over fair recruitment approaches for migrant labour.

## **Additional Resources**

ILO General Principles & Operational Guidance on Fair Recruitment

[https://www.ilo.org/wcmsp5/groups/public/---ed\\_protect/---protrav/---migrant/documents/publication/wcms\\_536755.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---migrant/documents/publication/wcms_536755.pdf)

ILO Q&As on Business and forced Labour

[https://www.ilo.org/empent/areas/business-helpdesk/faqs/WCMS\\_DOC\\_ENT\\_HLP\\_FL\\_FAQ\\_EN/lang--en/index](https://www.ilo.org/empent/areas/business-helpdesk/faqs/WCMS_DOC_ENT_HLP_FL_FAQ_EN/lang--en/index).

Verité Fair Hiring Toolkit

[www.verite.org](http://www.verite.org)

Consumer Goods Forum Guidance on Priority Industry tool kit

<https://www.theconsumergoodsforum.com/wp-content/uploads/2018/05/Guidance-on-the-Priority-Industry-Principles.pdf>

ILO Indicators of Forced Labour

[https://www.ilo.org/global/topics/forced-labour/publications/WCMS\\_203832/lang--en/index](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index).

ILO Forced Labour toolkit

The Principles and Guidance for the repayment of Migrant Worker Recruitment fees

<https://impacttlimited.com/principles-for-repayment-of-recruitment-fees/incoples>

<https://iris.iom.int/fair-workers>



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