

**INQUIRY INTO MODERN SLAVERY RISKS FACED BY  
TEMPORARY MIGRANT WORKERS IN RURAL AND  
REGIONAL NEW SOUTH WALES**

**Organisation:** Be Slavery Free

**Date Received:** 21 March 2025

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21 March 2025

Submission to the Modern Slavery Committee of the Parliament of New South Wales in consideration of the "Inquiry into modern slavery risks faced by temporary migrant workers in rural and regional New South Wales".

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I am pleased to make this submission by Blunumber Foundation, a New York 501c3 non-profit focused on digital and data rights, with Be Slavery Free (Australia) and inputs from Unseen UK, a non-profit addressing issues of modern slavery.

1. Together, Blunumber, Be Slavery Free and Unseen have been developing and deploying technology to enable 'direct worker voice' from migrant workers on farms in the UK participating in migrant worker schemes, and migrant workers in other sectors across Asia. The inputs we provide here are based on our work and which we believe may have relevant insights for the Inquiry.
2. We attach as a reference frame for our submission a typical poster from a recent project where workers had been asked a series of simple Yes/No survey questions to establish a baseline for sentiment on key issues within their population and communities. This poster shows how worker feedback on key issues are communicated back so they are assured that their perspectives are taken into account when policy is formulated on prevention of abuse or remedy.
3. We submit that direct input of migrant workers must be part of the solution-creation process and technology today exists to enable workers to supply that input.
4. We believe that modern slavery risks identified by lived experience of migrant workers is meaningful when it is based on evidence drawn at scale from the impacted population. Assuming incidence and violations are measures of weaknesses in the system, they can and should be quantified by using affordable and accessible mobile technology platforms. From this, underlying causes and the true extent of forced labour can be reasonably qualified.



**BE SLAVERY FREE**

5. We believe that a large baseline dataset supplied directly by workers will test and tier the structural factors that make exploitation possible. Consequently, that data will target where monitoring, compliance and enforcement should be focused.
6. Without an objective baseline on the myriad of issues involved, simple reliance on subjective or anecdotal risks intervening on issues of less importance to migrant workers and only fixing symptoms. Therefore:
  - a) Enable migrant workers to provide evidence direct and at scale to support policy decisions, such as those for improving practices in the labour hire sector.
  - b) Use the data provided directly from workers to check-and-balance anecdotal evidence, workplace grievances, whistleblowing, and audit reports to ensure that all policy decisions are based on solid evidence.
  - c) This would inherently establish the necessity of, and mechanism to, involve affected migrant workers in the creation of solutions.
7. We are pleased to submit further a case study recently completed for GIZ, the German government agency for development cooperation, which (albeit for the Electronics sector in India and Malaysia) provides a researched and qualified basis for our submission based on data supplied by over 2,000 workers.
8. We remain at your disposal should you have any questions or require elaboration on any points in this submission.

Yours faithfully,

Carolyn Kitto, OAM  
Director, Be Slavery Free

# We heard you!



The five main issues you raised were:

ILO 10  
ABUSE OF WORKING  
AND LIVING CONDITIONS



**44%** say you are either too hot or cold at work

ILO 6  
INTIMIDATION AND  
THREATS



**37%** say you do not have an anonymous channel to complain about supervisor

ILO 10  
ABUSE OF WORKING  
AND LIVING CONDITIONS



**17%** say the toilets are not clean

ILO 10  
ABUSE OF WORKING  
AND LIVING CONDITIONS



**13%** say sometimes you are sick or hurt at work

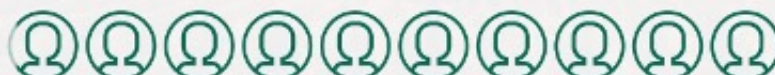
ILO 1  
ABUSE OF  
VULNERABILITY



**11%** say you do not have a written employment contract

You said you are satisfied with:

ILO 5  
PHYSICAL & SEXUAL  
VIOLENCE



**99%** say that you have not been physically hurt by anyone at work

ILO 8  
WITHHOLDING OF  
WAGES



**97%** say that you are paid wages as promised

ILO 6  
INTIMIDATION AND  
THREATS



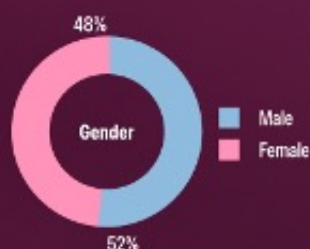
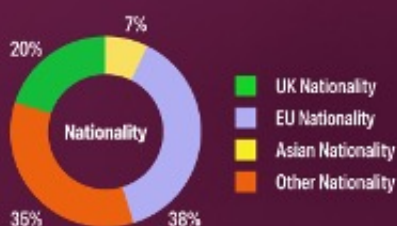
**95%** say you feel safe at work

## Who answered?

Over 38% of you were from the EU, 20% from the UK, 7% from Asia and 35% said you were from elsewhere. Most of you answered during your shift.

All respondents were generally positive about access to clean water, non-discrimination policies and safety in the workspace. Women were slightly more satisfied than men on working conditions generally.

Only the issue of "having an anonymous channel to complain about a supervisor" had any significant differences between men and women.



This poster shows you highlights – if you want to learn more, scan here:



**Learn More?**



Did you get paid?

If you have not been paid scan here and let us know! We'll sort it out.



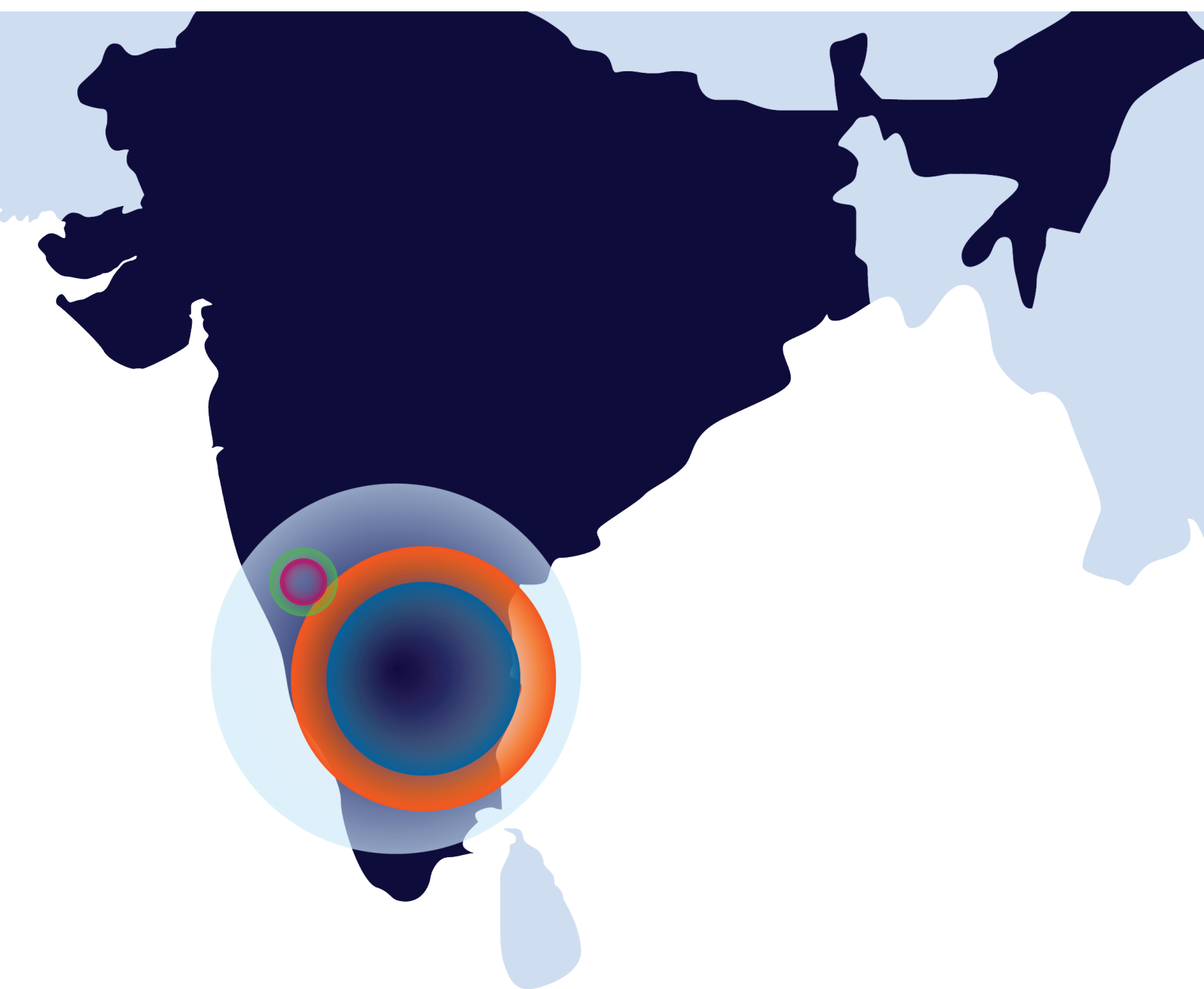
**Get Paid!**



**IGS** INITIATIVE FOR  
GLOBAL SOLIDARITY

# Direct Worker Voice for HRDD

A case study from the electronics sector of using data supplied by workers in India and Malaysia to identify forced labour and respond to human rights risks.



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## Impressum

Bluenumber Foundation, Inc.  
85 Broad St, New York, NY 10004 United States  
Registration 474271112 (EIN) and 45-48-69 (NY)  
At the New York State Attorney-General's Office

## Board of Directors

Mr Roger Branigin III (Chair)  
Ms Peace Kuteesa (Member)  
Ms Julia Ormond (Member)  
Dr Puvan J Selvanathan (Executive Director)

## Contact

Phone +1 347 930-0430  
Fax +1 646-480-1635  
E-Mail [publications@bluenumber.org](mailto:publications@bluenumber.org)

## Design

Merlyn Selvanathan



Bluenumber Foundation, Inc., is a New York 501c3, has been on a mission for Digital Equity and Data Rights since 2015. A 'bluenumber' (B#) is a free unique self-sovereign identity (SSI) with a Personal Data Vault (PDV) to own and keep the data it creates. B#-holders can create a wallet to register digital assets and receive credentials for data transactions. The Bluenumber Ecosystem is a rights-based platform where data property rights are respected. We believe this is the only basis for equitable participation and fairness in the Digital Economy. All data creators must have rights to choose what data to share and be compensated for their effort in creating that data.

## **IGS** INITIATIVE FOR GLOBAL SOLIDARITY

This publication has been produced as part of a project funded by the Initiative for Global Solidarity (IGS). IGS is a German development cooperation project, acting on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ) and implemented by the German Corporation for international Cooperation (GIZ) GmbH. While we are pleased to support the development and dissemination of this work, the views, findings, and conclusions expressed herein are those of the author and do not necessarily reflect the views of the Initiative for Global Solidarity. The author bears sole responsibility for the content of this publication.



# Executive Summary

This case study explores the deployment of a direct worker voice platform in two factories in southern India supplying a major global electronics brand. The initiative aimed to enhance human rights due diligence (HRDD), assess the effectiveness of traditional social audits, and empower workers with control over their data.

New forced labour regulations with stricter evidentiary requirements make HRDD essential for ethical supply chain reporting. Traditional social audits, often reliant on small samples and prone to manipulation, frequently fail to capture true worker conditions. This study evaluated whether direct worker voice could: (1) provide a cost-effective, scalable alternative to social audits; (2) improve compliance assurance with labour standards; and (3) replace or enhance sampled worker interviews with comprehensive, worker-driven insights.

The platform, **MillionMakers™**, enabled workers to anonymously share their experiences through a yes/no smartphone survey. Workers were compensated with licensing fees for their data, reinforcing their rights as data creators. The study achieved a 70% participation rate across a workforce of 2,102. All responses were anonymized and aggregated for analysis.

Aligned with International Labour Organization (ILO) indicators, the survey assessed issues such as discrimination, unionization, and forced labour conditions. Implementation was low-cost and minimally disruptive, managed by factory HR teams without requiring third-party auditors or site visits.

Results varied across the two factories. One factory reported high worker satisfaction with no major concerns, while the other revealed issues such as discrimination, restricted movement, and retention of identity documents, with gender disparities in responses. These findings highlighted areas for targeted remediation. Comparing direct worker voice data to a recent social audit revealed significant discrepancies. While the audit, based on 40 interviews, claimed compliance, data from 385 anonymous workers contradicted key findings related to wages, benefits, and emergency preparedness.

Workers trusted the platform due to its anonymity, transparent data usage, and financial incentives. The platform's independence from employer influence and seamless integration into HR operations made it adaptable across diverse supply chains. Identified issues were addressed promptly with follow-up surveys scheduled within eight weeks. This approach empowered workers and built trust in HR teams, reducing the risk of greenwashing or regulatory non-compliance.

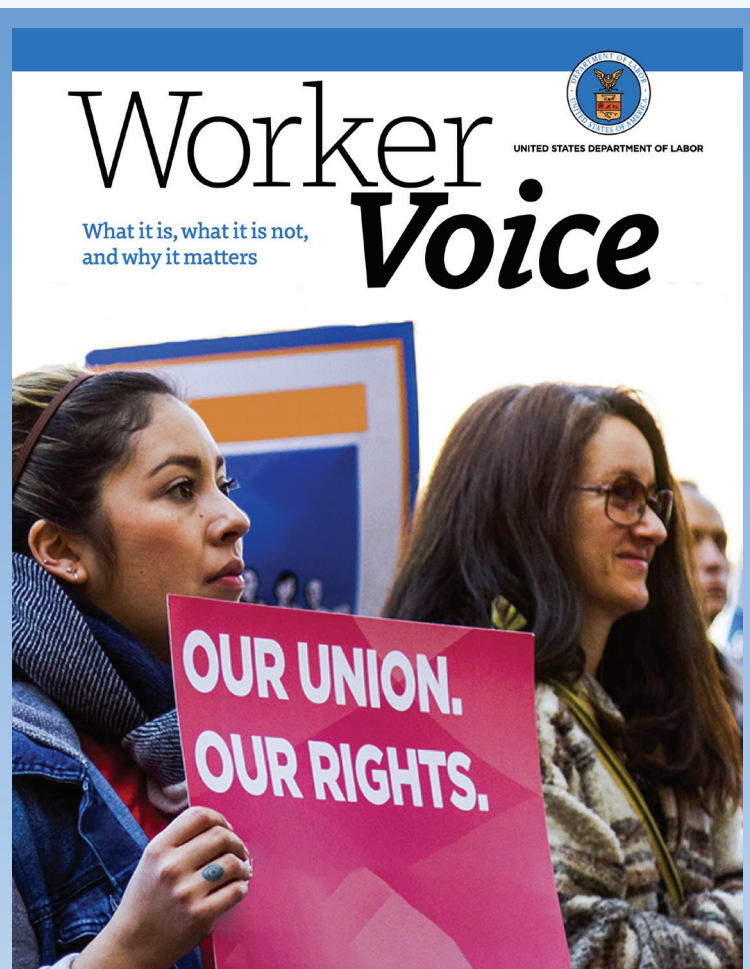
The study highlighted challenges such as limited smartphone access, variable response rates, and occasional question misinterpretation. However, MillionMakers proved cost-effective, providing actionable insights while minimizing disruptions. It demonstrated that direct worker voice platforms can complement or replace traditional audits, offering scalable, reliable, and worker-driven data.



# Introduction

This is a case study on the deployment of MillionMakers™ ([www.millionmakers.org](http://www.millionmakers.org)), a technology platform for ‘direct worker voice’ (“MM-DWV”) developed by Bluenumber®, ([www.bluenumber.org](http://www.bluenumber.org)) a rights-based non-profit technology provider pursuing digital equity and data rights. MM-DWV was deployed in two factories in a major electronics manufacturing hub in southern India, both being suppliers to a major global electronics manufacturer (“Brand”). The MM-DWV findings provided the Brand with bottom-up data from workers at scale to corroborate and determine the risks remaining from compliance or consumer-facing claims made by sole reliance on conventional top-down audits.

In a 2023 report<sup>1</sup>(Anner, 2023) the US Department of Labor (DOL) defined ‘worker voice’ as “the capacity of workers to speak up, articulate, and manifest collective agency that ultimately improves the terms and conditions of their employment and their livelihoods. It is also about shaping the societies in which they live and contributing to democratic participation beyond the workplace”.



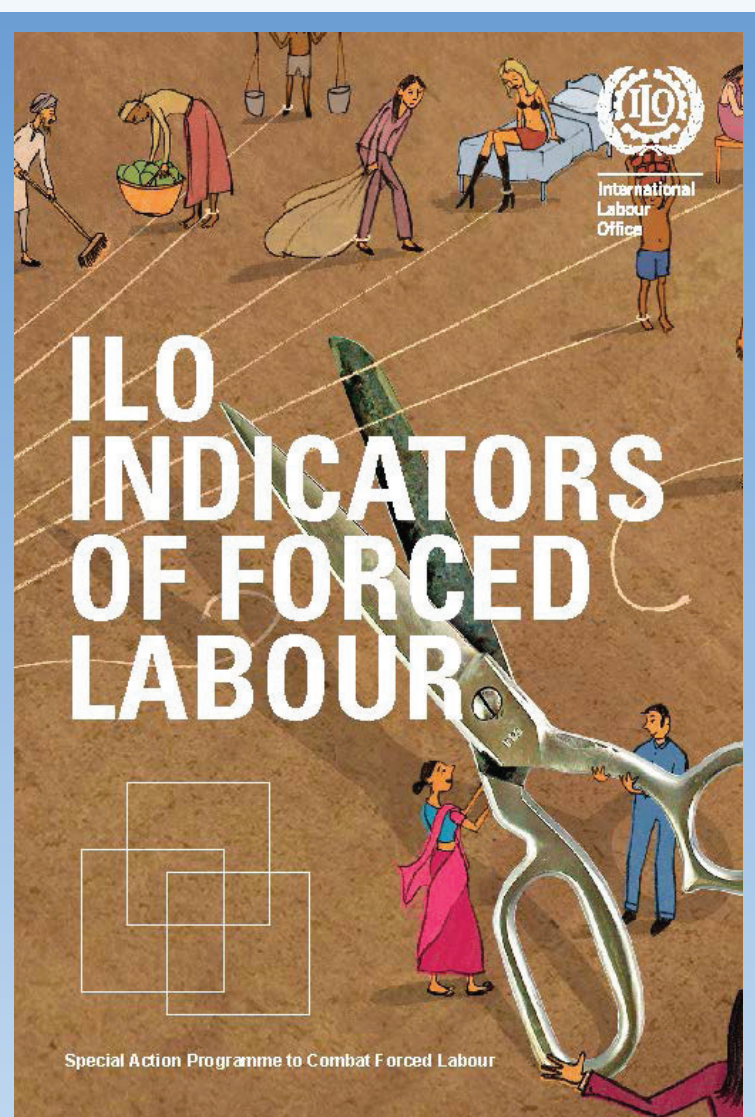
<sup>1</sup> "Worker Voice: What it is, what it is not, and why it matters", 2023, Anner, M. & Fischer-Daly, M., [https://ler.la.psu.edu/wp-content/uploads/sites/4/2024/04/Penn-State-Worker-Voice-Report-Dec.-19-Final\\_amended\\_mfd\\_23March2024-2.pdf](https://ler.la.psu.edu/wp-content/uploads/sites/4/2024/04/Penn-State-Worker-Voice-Report-Dec.-19-Final_amended_mfd_23March2024-2.pdf)

This case study builds upon the DOL definition by extending the notion of collective agency by corroborating the prevalence of issues through collation of independent individual expressions received at scale. Accordingly, MM-DWV acts in three ways: (i) to recognise that worker voice can contribute to Human Rights Due Diligence (“HRDD”) as required by new forced labour legislation<sup>2</sup> and fulfil expectations set by guidance such as the *OECD on Responsible Business Conduct*<sup>3</sup>; (ii) that worker voice provided by workers directly using technology, i.e. ‘direct worker voice’, provides data to meet heightened evidentiary needs of that new legislation; and (iii) that workers should have rights of ownership and control over the data they create.

Importantly, MM-DWV is not a grievance mechanism. The questions asked are ‘Yes/No’, delivering a dataset meant for statistical analysis to verify suppliers operate ethically in compliance with International Labour Organization (ILO)<sup>4</sup> standards. In this iteration of MM-DWV there are no open-field questions requiring subjective interpretation. The purpose of such a bottom-up dataset is to provide a baseline against which grievances or complaints can be contextualized.

2 EU Forced Labour Ban <https://www.consilium.europa.eu/en/press/press-releases/2024/11/19/products-made-with-forced-labour-council-adopts-ban/>, US Congress, Section 307 and Imports Produced by Forced Labor <https://crsreports.congress.gov/product/pdf/IF/IF11360#:~:text=307%20of%20the%20Tariff%20Act,forced%20or%20indentured%20child%20labor,> Australia Modern Slavery Act 2018, compilation 7.11.2024 <https://www.legislation.gov.au/C2018A00153/latest/text>

3 OECD Due Diligence Guidance for Responsible Business Conduct <https://mneguidelines.oecd.org/due-diligence-guidance-for-responsible-business-conduct.html>



4 [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/publication/wcms\\_203832.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf)

This study should be considered within the context of HRDD, conventional social audits, and other methods of ‘intermediated data collection’, as summarised in this table:

| HRDD   | Social Audits  | Intermediated Data-Collection  | Direct Worker Voice  |
|--|--|--|--|
| <i>[Objective]</i> To identify, prevent, mitigate, and account for potential adverse human rights impacts.   | <i>[Objective]</i> To systematically evaluate a company's adherence to a voluntary or industry standard.   | <i>[Objective]</i> To enable workers to express their opinions, concerns, and grievances via 3rd parties.  | <i>[Objective]</i> To enable workers to provide zero-party data to the company and any stakeholder, without intermediaries.  |
| <i>[by]</i> Assessing and addressing human rights risks throughout the entire supply chain, including suppliers, subcontractors, and raw material sources. | <i>[by]</i> A third-party auditor evaluating compliance through document review, site inspections, and management and worker interviews  | <i>[by]</i> Collecting data from workers via channels such as whistleblower hotlines and grievance mechanisms as to report violations or share feedback. | <i>[by]</i> Incentivising workers to supply data via their own smartphones, to assert their rights as data creators and own of the data they create.   |
| <i>[Output is]</i> due diligence and risk assessment   | <i>[Output is]</i> A private report to the company on its compliance to standards.   | <i>[Output is]</i> A private report for company with aggregated anonymous, anecdotal feedback from workers to action remedy.                             | <i>[Output is]</i> Licensable dataset for HRDD of worker sentiment for company to action remedy and evidence claims to stakeholders.   |
| <i>[Enables &amp; Drives]</i> Stakeholder engagement, policy development, supplier evaluation, monitoring, and continuous improvement.                     | <i>[Enables &amp; Drives]</i> Identification of non-compliance issues, developing corrective action plans, and claims of certification according to voluntary standards or codes of conduct. | <i>[Enables &amp; Drives]</i> Processes the company is willing to consider and adopt to improve working conditions and labour rights.                    | <i>[Enables &amp; Drives]</i> Worker digital literacy, agency and data monetization by data licensing. Collective action by shareable datasets between worker groups, to test policies, and catalyse remedy. |

*Summary of objectives of approaches, how they are achieved, what they output and what those outputs aim to do.*

# Objectives

This case aimed:

1. To determine if a direct worker voice platform is cost-effective at scale, by reducing time and effort to remedy compared to social audits.
2. To explore if a direct worker voice platform provides greater assurance than conventional audits alone that a factory is free of forced labour and exploitation.
3. To assess if a bottom-up direct worker voice platform can enhance or replace sampled worker interviews in top-down social audits.

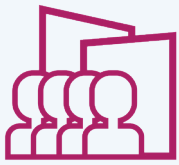


This case considers a basis for corroborating sample-based audit findings to the reality of worker experiences surveyed at scale at a given factory or supply chain site. In so doing, this case tests the assertion of Human Rights Watch (HRW), a non-governmental organization (NGO), that certification is “not enough to prevent and remedy labour rights abuses in global supply chains” in its 2022 report ‘*Obsessed with Audit Tools, Missing the Goal: Why Social Audits Can’t Fix Labor Rights Abuses in Global Supply Chains*’<sup>5</sup>.

<sup>5</sup> <https://www.hrw.org/news/2022/11/15/social-audits-no-cure-retail-supply-chain-labor-abus>



# Methodology



## Workers Opt-In

Request to participate by scanning QR-code at factory in specific time frame.



## Verified Digital ID and Geolocation

Workers qualify if they are within the pre-set factory perimeter polygon.



## Answer Questions

20 questions, 10 mins per day for 1, 3, 5 days on ILO indicators.



## Digital, direct payment

To workers mobile wallet for their created data, licensed to create a report.



## Anonymous Data

Always aggregated, anonymized data for company.

The MM-DWV platform is a mobile technology enabling workers to self-declare, create, and license data about their working conditions, which can be rapidly assessed to provide worker sentiment at the factory and to cross-check findings of any recent conventional audit<sup>6</sup>. MM-DWV recognises each worker as the creator and owner of all data they create and pays a license fee to use the data they supply.

MM-DWV does not collect any personal information. The worker's mobile number is used to pay the license fee. MM-DWV is not an agent or contractor to the supplier and does not meet or speak to workers.

MM-DWV uses a 'no-sampling approach', i.e. the platform is made available to the whole population at the factory. Every worker, office or service staff can self-declare what type of personnel and gender they are, be authenticated, then continue to respond to the survey. All data is always anonymized and aggregated in reports and findings.

A minimum participation rate of 30% of total factory workers was accepted as a reasonable threshold to determine working conditions. A response rate of less than that would trigger an investigation, for example, if workers were actively dissuaded from participating, or if the license fee offered was not an attractive incentive.

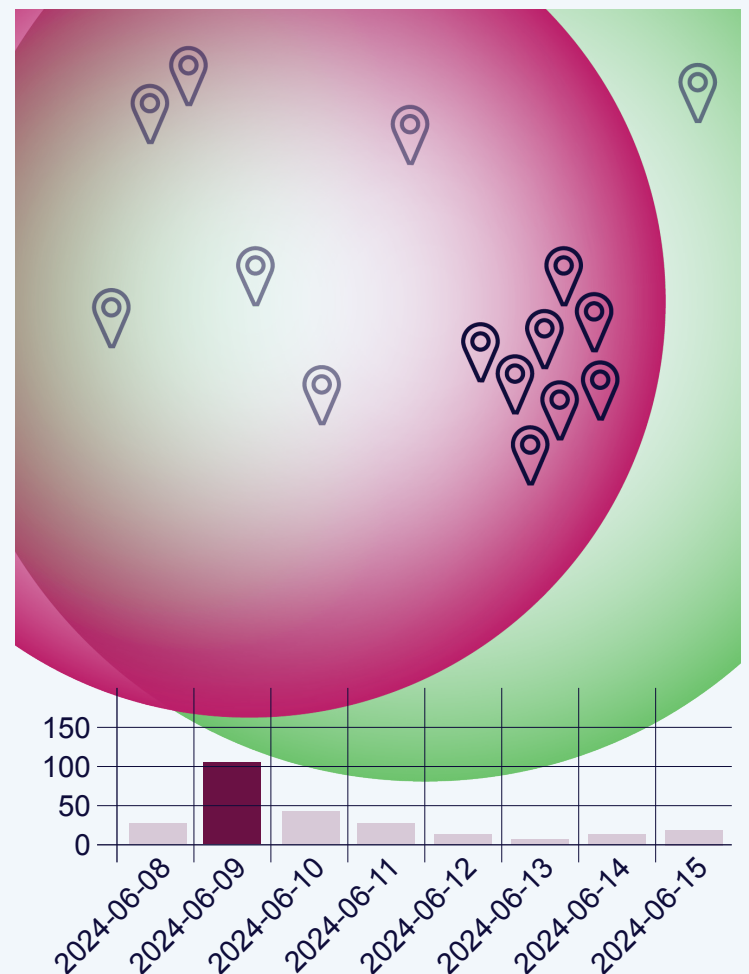
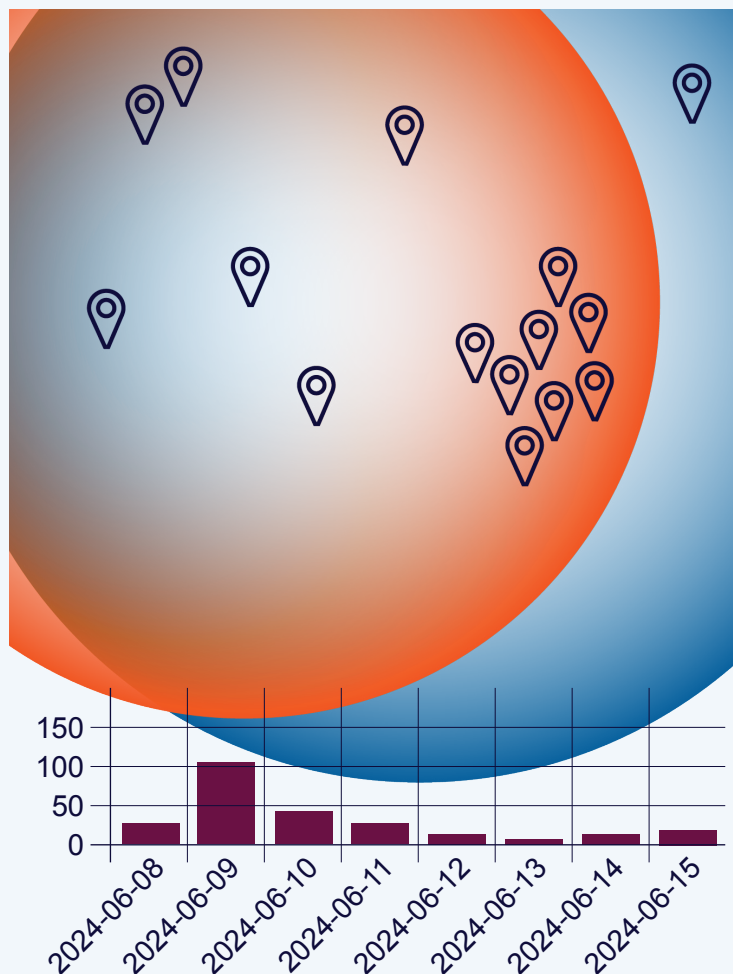
Workers are authenticated when they scan a QR code at the factory. They qualify if they are within the pre-set factory perimeter polygon and opt-in during a specific timeframe. Only workers with appropriate on-site clearances are assumed and deemed as authorised to be in the prescribed place at that time.

<sup>6</sup> <https://millionmakers.org>

The post-survey analysis examined how many workers did not participate, or started but did not finish the survey, and if factors such as worker type, time, location, or other aspects were significant. This provided an evidence-based understanding of the response rate, the respondent demographic, and any notable observation drawn from the data.

In addition to the responses supplied by the workers via the survey, each respondent consents to sharing the date, time and place of when and where they take the survey in each instance. This provides MM-DWV with additional data to build patterns, i.e. if co-workers are creating in groups, if workers feel safe responding from inside the factory and during working hours, or if they choose to do it outside the factory and after hours, avoiding employer influence or coercion.

This case also investigated if MM-DWV could provide greater assurance than conventional audits to identify issues that directly impacted workers. For previous MM-DWV deployments in Malaysia, Bluenumber had comprehensively mapped all MM-DWV questions to relevant sections of an audit standard used extensively in the Electronics sector. A claim of conformance by a supplier to that standard is based on an in-person announced site visit by an auditor who conducts interviews with the Management and a sample (typically between 2% to 3%) of the worker population. This case study applied the methodology of comparing an audit's sample-based claims of worker conditions to the responses given by workers at scale to 'agree' or 'disagree' if the conformance claimed by the audit could be relied upon.



Workers register anonymously within an agreed authentication area. Thereafter they can respond to the survey anywhere, anytime. Patterns suggest if workers feel safe responding from within the factory or during working hours.



# Implementation



## Virtual Meetings

MM-DWV team engaged with suppliers HR teams in virtual meetings.



## Workers Access MM-DWV platform

Each factory 'Baseline Survey' was open for 14 consecutive days.



## 100 Data points

Each worker provided Yes/No responses, yielding a total of 100 data points.



## MM-DWV licence dataset

All provided datasets of 100 data points are licensed for 1-time use in aggregated report.



## Digital Payment

All verified participants receive the same licensing fee to their digital wallet.

The MM-DWV platform was deployed for two suppliers at two separate factories in southern India. Both factories ran the same survey concurrently and it was open to all management, factory and service personnel. Neither factory was physically visited. The MM-DWV team engaged with each supplier's HR team only in virtual meetings where deployment checklists were reviewed, and the survey was demonstrated with guidance on how to instruct workers. Soft-copy posters in local languages were provided for the HR teams to print and place at locations throughout the factory. From the training the HR teams created additional materials for their own workers to assist their internal workforce briefings. Because they had trialled the platform in entirety before deployment to the general worker population, the HR personnel were fully capable of responding to questions and troubleshooting immediately.

Workers accessed the MM-DWV platform in June 2024 with the survey open for 14 consecutive days. Within this period workers were invited to respond anonymously to a 5-day 'Baseline Survey' of 80 (eighty) questions calibrated to ILO Forced Labour indicators covering worker satisfaction, freedom from discrimination, and unionisation. Each worker provided only 'Yes' or 'No' responses yielding a statistically measurable dataset of 80 datapoints, plus 20 additional datapoints of the time, date and geolocation of when and where each response was given over the period. MM-DWV licenced the dataset of 100 datapoints offered by each worker for INR500 (five hundred Indian rupees) for 1-time use to prepare an anonymised, aggregated report on the working conditions at each factory.

Regardless of gender or category of worker every respondent who supplied a dataset received the same licensing fee.

# Descriptive Findings

Each factory provided the total number of workers on site in three categories: ‘Factory Workers’, ‘Management or Office Staff’, and ‘Service Staff (Cleaners, Security)’. Altogether 1,544 unique datasets were supplied by workers, equating to a final response rate of 70% of the total population at both factories.

By studying the date, time and place of survey responses initially and on consecutive days, the pattern of responses suggested workers created data at their own pace, when and where they chose, and without employer coercion.

It was noted that 112% of respondents claimed to be ‘Management or Office’ staff and 113% to be ‘Service’ staff. This immediate discrepancy reflected that some workers thought they were in these categories, but their employers did not.

|                                    | Total Workers | Responses | Male | Female | Completion |
|------------------------------------|---------------|-----------|------|--------|------------|
| Factory Workers                    | 1,962         | 1,388     | 585  | 803    | 68%        |
| Management or Office Staff         | 110           | 127       | 70   | 57     | 112%       |
| Service Staff (Cleaners, Security) | 30            | 29        | 19   | 10     | 113%       |
| Total Respondents                  | 2,102         | 1,544     | 674  | 870    | 70%        |

The two factories ('Factory A' and 'Factory B') were 15.9km away from each other. Factory A had a total of 510 workers with 318 (62%) responding. Factory B was approximately three times larger with 1,592 workers of which 1,226 participated with a response rate of 77%.

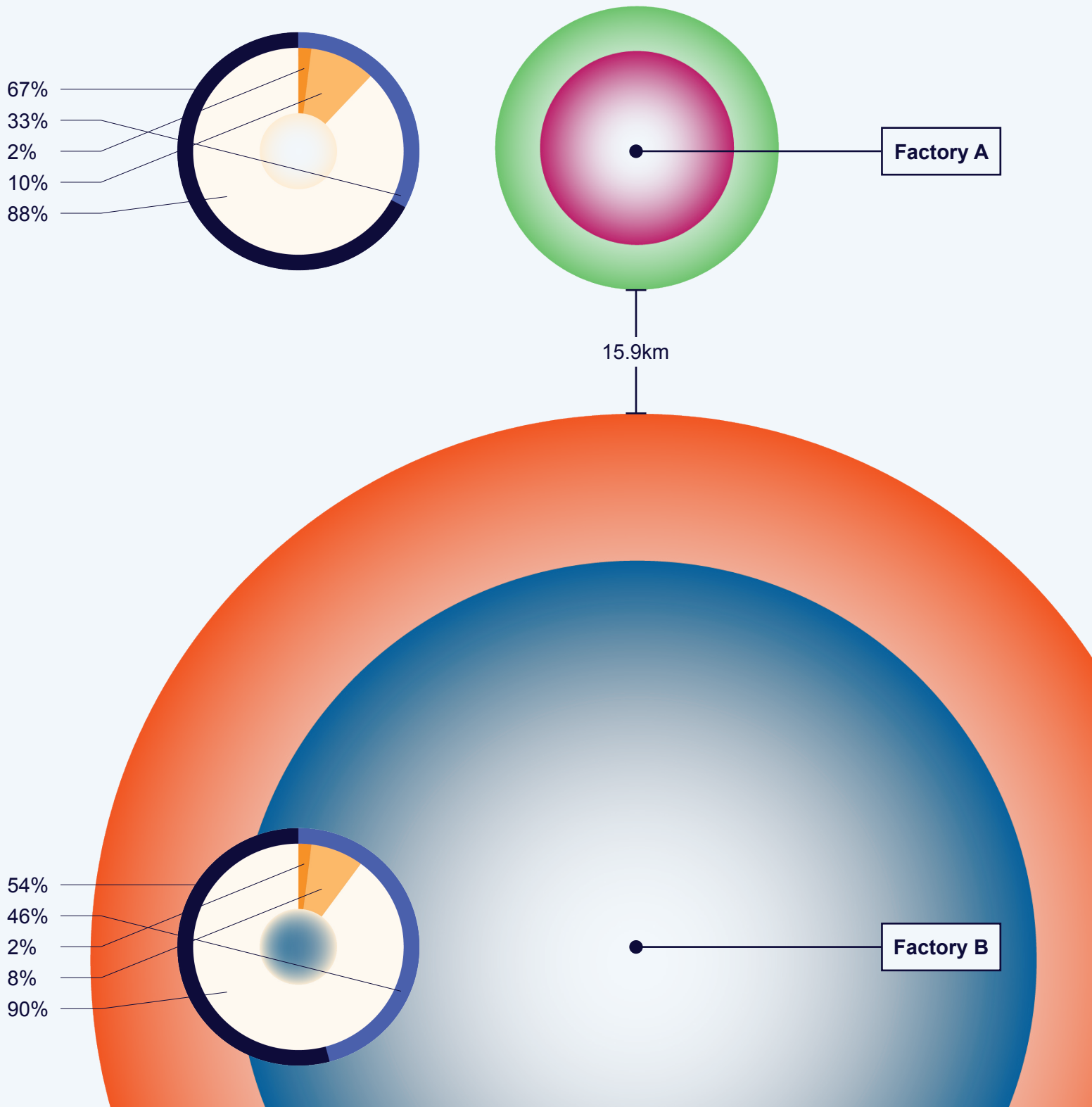
### Respondent Type

Female Male

Factory Worker

Management / Office

Service Staff

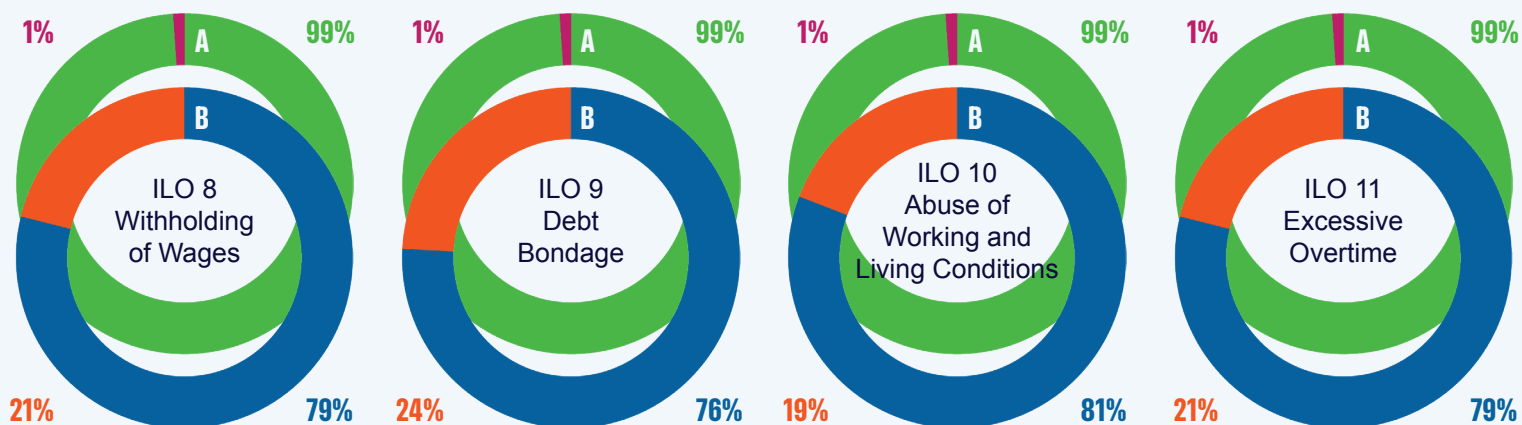
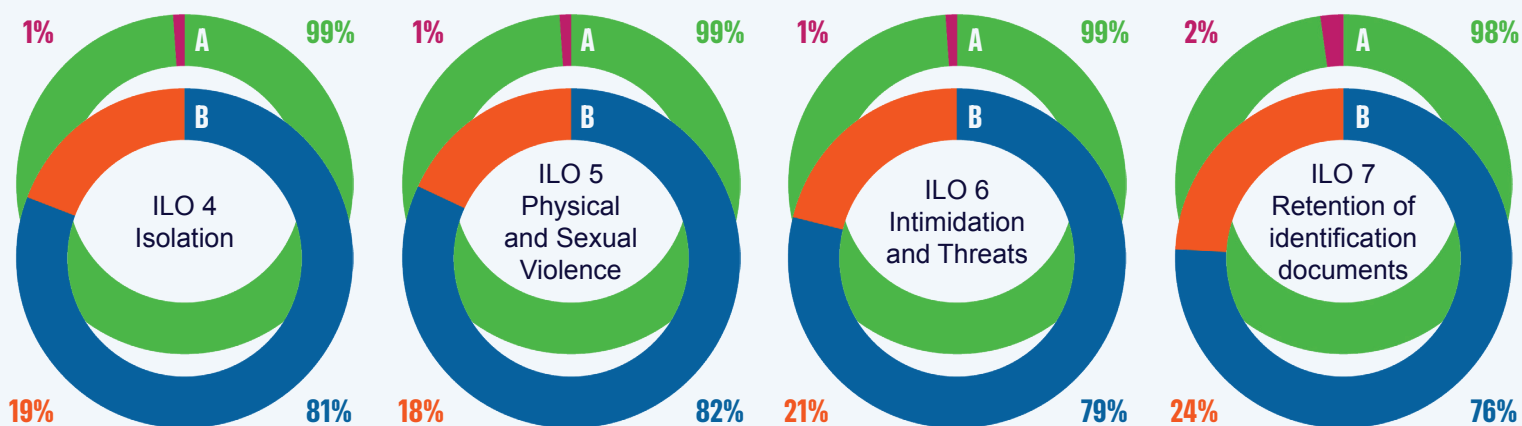
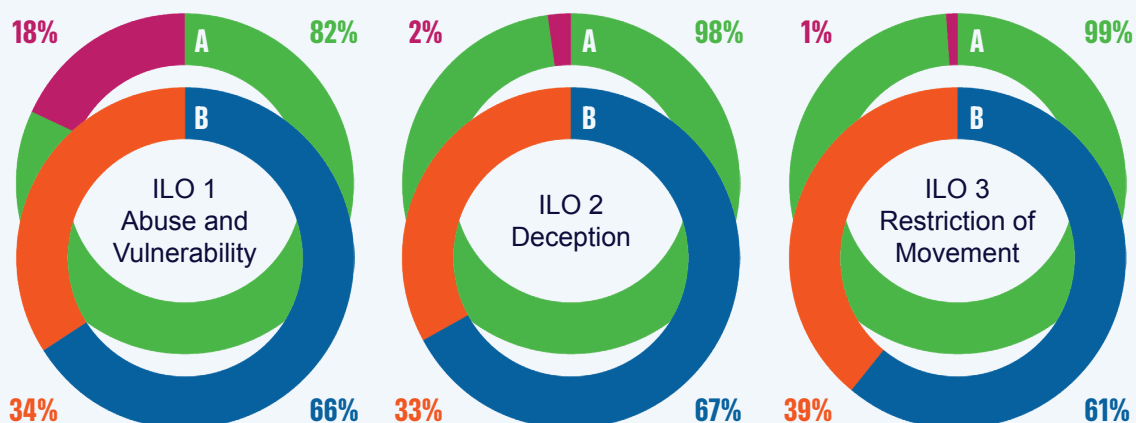
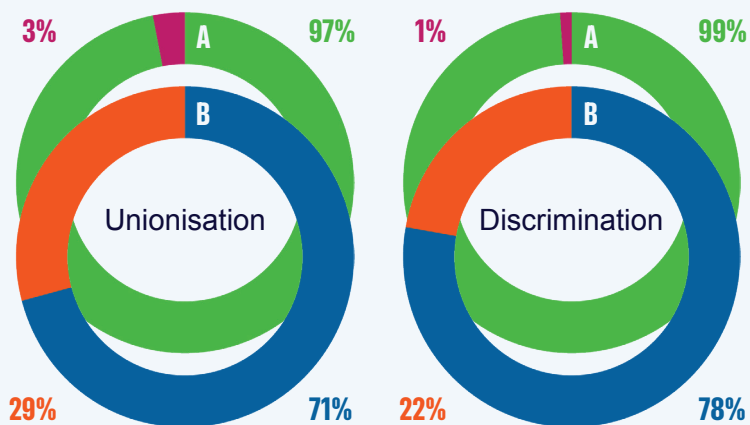
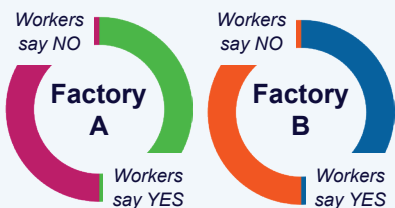


Graphic showing relative positions of factories and breakdown of respondents

# Data Analysis



International  
Labour  
Organization



Responses from workers in both factories can be compared apple-for-apple because survey uses Yes/No answers calibrated directly to questions using specific terms in ILO Forced Labour indicators.

# Findings to Action

Analysis revealed several key insights into the working conditions at each factory, and if specific indicators were significant when disaggregated by gender or worker category. Overall, there was a strong baseline across both factories with 98% of workers reported being “happy at work”.

## Legend

- Needs immediate attention (high priority)
- Needs attention (clarify with workers)
- No Issue

| ILO 1 - Abuse and Vulnerability |                                       |
|---------------------------------|---------------------------------------|
| 48%                             | are provided housing and food         |
| 48%                             | all co-workers are old enough         |
| 61%                             | can stop working if they want         |
| 86%                             | understand employment contract        |
| ILO 2 - Deception               |                                       |
| 58%                             | received all promised benefits        |
| 64%                             | job is as promised when hired         |
| 75%                             | recruiters were honest about job      |
| 69%                             | being paid promised salary            |
| ILO 3 - Restriction of Movement |                                       |
| 19%                             | movement not controlled by cameras    |
| 52%                             | movement not controlled by supervisor |
| 54%                             | movement not controlled by guards     |
| 91%                             | can see a doctor                      |
| ILO 4 - Isolation               |                                       |
| 72%                             | keep their phone                      |
| 75%                             | not separated from co-workers         |
| 81%                             | choose own travel to work             |
| 88%                             | can talk freely to friends            |

Example of aggregate data results and analysis

Workers at Factory A did not raise any significant issues, with satisfaction within a margin of 5% of the total responding population. Factory A had robust worker association measures, also male and female responses were uniform with no significant differences between genders. However, workers revealed that Factory B had areas that needed attention, particularly about union representation and discrimination. Some workers expressed concerns about being vulnerable, restriction of movement, and retention of identity documents. Further, several responses showed a significant difference between male and female workers, particularly in perceptions of control and safety.

In both factories A and B, a tolerance was applied to the data received to account for instances where certain questions may have been understood differently by different workers, even though the survey was delivered in local language. All data results and analysis were presented in aggregate for the Brand and by individual factory for discussion with each supplier. The information was provided as a data dashboard for the Brand’s internal teams to review and action the findings

For the discrepancy in response rates of over 100% for ‘Management or Office’ and ‘Service’ staff, both suppliers took immediate action to review their overall personnel categorization so that classifications, scope and responsibilities were clear to staff. Such non-alignment between employers and employees reflects and affects expectation of compensation and benefits associated with roles and duties.

Based on Factory A workers responding very positively that, within a negligible tolerance, there were no issues in their workplace, the Brand chose not to prescribe any immediate remedial action for the supplier operating from Factory A.

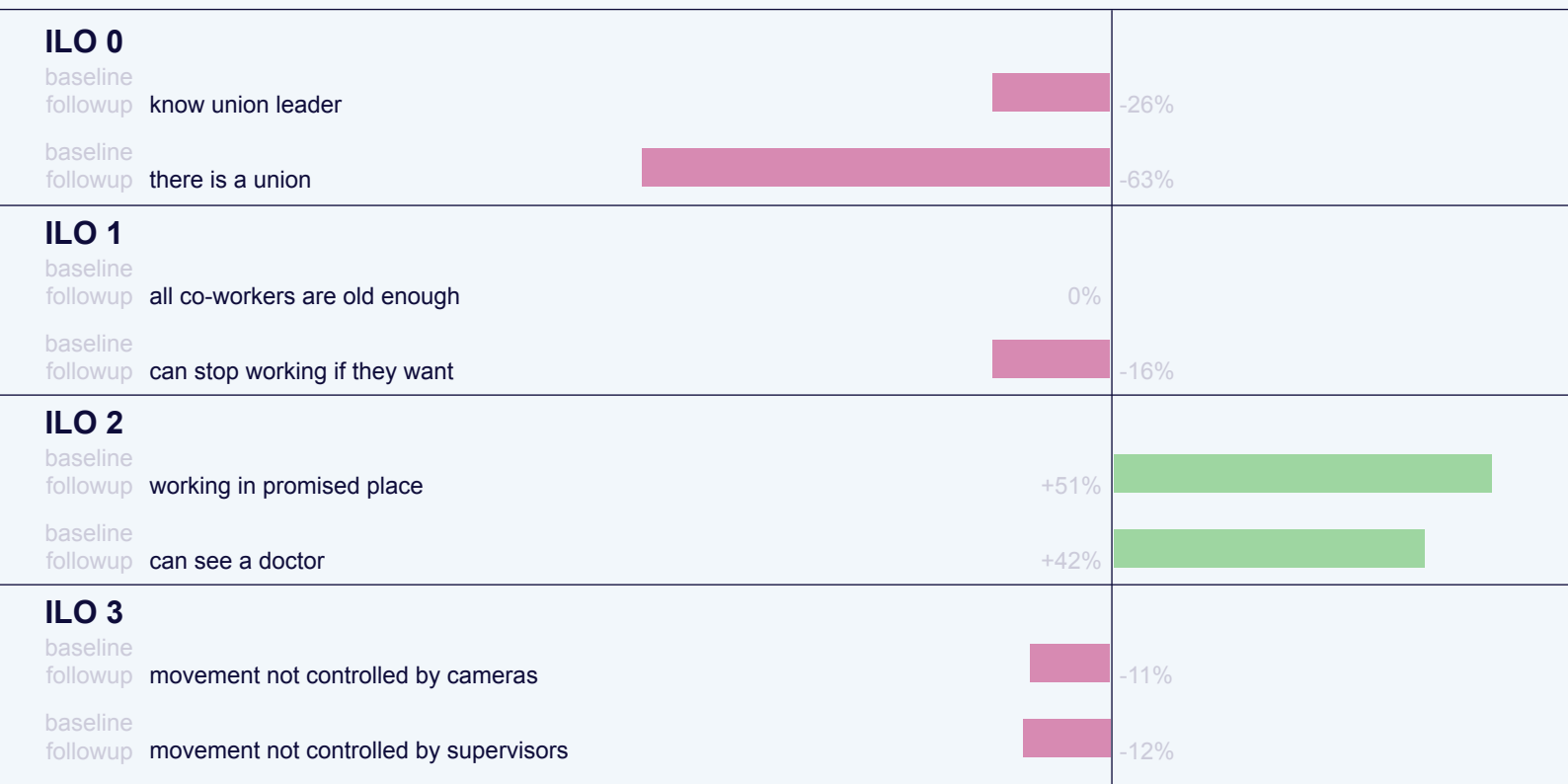
However, findings at Factory B showed some targeted improvements were required to educate workers about their rights and communicate or clarify management practices to workers. Further, there were significant differences between how male and female workers perceived safety and control of movement, calling for gender-specific interventions to address disparities and improve overall worker satisfaction. The data revealed that some workers at Factory B were clearly unaware or felt uncomfortable with certain conditions in the workplace. Specifically, the Brand suggested that Factory B addressed worker perceptions of control, discrimination, and the retention of identity documents.

Factory B agreed to action remedy rapidly by making workers aware of unionisation and worker association, and to clarify management policy, for example, on why worker movement is restricted in certain factory areas.

Both the Brand and Factory B agreed to run a follow-up survey in within 8 weeks with a selection of the lowest scoring questions and which showed significant gender disparity in responses. The follow-up would target a random sample of workers invited to respond after working hours – meaning the supplier would not know neither which workers would be asked which questions, nor where or when.

#### Legend

- Needs immediate attention (high priority)
- No Issue



Example of baseline and followup survey results



# Verifying Audits

| Audit Standard Category |  | Audit Says   | From Workers in MM Survey |              |
|-------------------------|--|--------------|---------------------------|--------------|
| Labour                  |  | Conformance  | 28%                       | Disagree     |
| A1                      | Freely Chosen Employment                 | Conformance  | 30%                       | Disagree     |
| A2                      | Child Labour Avoidance                   | Conformance  | 52%                       | Disagree     |
| A3                      | Working Hours                            | Conformance  | 20%                       | Disagree     |
| A4                      | Wages and Benefits                       | Conformance  | 26%                       | Disagree     |
| A5                      | Humane Treatment                         | Conformance  | 20%                       | Disagree     |
| A6                      | Non Discrimination                       | Conformance  | 22%                       | Disagree     |
| A7                      | Freedom of Association                   | Conformance  | 29%                       | Disagree     |
| A8                      | Labour Provision Good Practices          | Not reviewed | NR                        | Not reviewed |
| Health & Safety         |  | Minor        | 23%                       | Disagree     |
| B1                      | Occupational Safety                      | Conformance  | 18%                       | Disagree     |
| B2                      | Emergency Preparedness                   | Minor        | 72%                       | Agree        |
| B3                      | Occupational Injury and Illness          | Conformance  | 23%                       | Disagree     |
| B4                      | Industry Hygiene                         | Conformance  | 17%                       | Disagree     |
| B5                      | Physically Demanding Work                | Conformance  | 23%                       | Disagree     |
| B6                      | Machine Safeguarding                     | Conformance  | 28%                       | Disagree     |
| B7                      | Food, Sanitation and Housing             | Conformance  | 17%                       | Disagree     |
| B8                      | Health and Safety Communication          | Conformance  | 28%                       | Disagree     |
| B9                      | Health & Safety Provision good Practices | Not reviewed | NR                        | Not reviewed |

Less than three months prior to the deployment of MM-DWV Factory B had done an audit for 'responsible business' conduct standard used extensively in the Electronics sector. Factory B provided the audit report for this case study to analyse if the auditor's findings on worker conditions were aligned to what the workers themselves reported in the MM-DWV survey. The analysis methodology for comparing that industry standard audit to the MM-DWV survey was developed and tested by Bluenumber® based on data from several audits of that same standard against thousands of electronics worker responses in Malaysia.














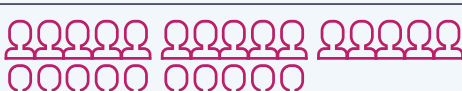






Generally, audit reports are prepared after an in-person pre-announced site visit by an auditor who conducts interviews with the Management and a sample (typically between 2% to 3%) of the worker population. This case study sought to verify if the audit 'conformance' findings for worker conditions at Factory B to the responsible business standard, extrapolated from the sample of workers interviewed by the auditor, was commensurate with a what a larger number of workers at Factory B said through MM-DWV process. The MM-DWV responses from 1,226 workers (77% of workforce) was compared with the auditor interview of 40 workers (2.5% of workforce).

The study either 'agreed' or 'disagreed' with audit claim of 'Conformance' to the industry standard by comparing the response of 2.5% to the 77% of the surveyed worker population. For Labour and Health and Safety no claim of conformance by the audit was supported by workers with between 208 to 368 workers variously responding that aspects of their working conditions did not meet the requirement of the industry standard. For 'B2 – Emergency Preparedness' the auditor issued a 'minor' non-conformance having found emergency escape aisles blocked by pillars in two production buildings on three floors. The audit finding stated 40 interviewed workers said, "all exits are maintained in such way that do not create problem or obstacles to the employees during evacuation". But 339 workers of the population at site, responded "Yes" when asked by MM-DWV "Are any factory emergency exits locked?".

Unexpectedly low scores from the MM-DWV dataset, for example in the instance of 'Child Labour Avoidance', were immediately investigated by the supplier. A follow-up survey clarified that workers did not originally differentiate between the 'minimum working age' and the 'experience or maturity' of workers, and workers did not report any child labourers in the factory.

Four specific audit sections were directly mapped to MM-DWV questions: Freely Chosen Employment (two mapped questions), Non-Discrimination (one), Protection of Identity and Retaliation (two), and Wages and Benefits (five). The table the specific number of workers the auditor interviewed whose responses informed the conformance finding compared with those whose MM-DWV answers contradicted the audit finding. For example, on Wages and Benefits, the audit presents that 40 people interviewed were paid promised salaries, were not owed money, or paid late, and wages were not withheld. However, up to 385 workers surveyed, or nearly 10 times as many as those interviewed by the auditor, said the opposite.

Additionally, in this case the audit report provided by the supplier for comparison was done by a different brand to the Brand that did the MM-DWV survey. The worker population did not change between when the audit was carried out and when the survey was done. This suggests that a supplier could do one direct worker voice survey and use the data to inform many brands and verify industry standard audits within a period when the worker population remains constant. This would mean significant time and cost savings for both the supplier and the brands.

|  |   |    |   |  |     |
|--|---|----|---|--|-----|
| Freely Chosen Employment               | <i>did not pay fees to get job</i>      | 40 |    |    | 281 |
|  | <i>no need to pay to leave job</i>      | 40 |    |    | 281 |
| Non discrimination                     | <i>no discrimination</i>                | 40 |    |    | 272 |
| Protection of Identity and Retaliation | <i>can report employer to police</i>    | 40 |    |    | 344 |
|  | <i>not scared of supervisor</i>         | 40 |    |    | 424 |
| Wages and Benefits                     | <i>being paid promised salary</i>       | 40 |    |    | 385 |
|  | <i>employer does not owe money</i>      | 40 |    |    | 254 |
|  | <i>employer does not pay late</i>       | 40 |    |   | 300 |
|  | <i>employer does not withhold wages</i> | 40 |  |  | 322 |
|  | <i>employer pays on time</i>            | 40 |  |  | 129 |

## Legend

-  Audit “Yes” Responses
-  Workers disagreeing with Audit

Four audit sections comparing the workers interviewed by auditor resulting in audit conformance finding vs. numbers of workers in survey who did not agree with that audit finding.

This process also suggests that a serious, perhaps unintended, outcome is misunderstanding of worker issues. If unintended then the disagreement between an auditor’s finding and the workers’ experience may reflect that the issue itself is relatively minor. If wilful, then the disagreement may flag a major issue that is too expensive or challenging for the supplier to fix. However, a minor non-conformance audit finding enables issues to be selectively de-prioritized, so fewer resources are allocated to resolving them.

# Insights and Learnings



## Worker confidence

Workers did survey in own time, where they chose and were paid as promised.



## Building trust in HR

Workers see HR as the champion.



## Workers' independence

Workers opt-in. No fear or coercion by employer.



## Exposure to Risk and Moral Hazard

Avoids greenwashing or presuming no grievances mean all is well.



## Direct follow-up

Contact worker again directly. No permission needed from employer.



## Target recommendations

Honest worker feedback, recommendations tailored for site.



## Rapid Remedy

Review data and take immediate action.



## Independent Audit

Workers provide common source of truth to check-and-balance audits.



## Cost Effective

Fully remote deployment. No 3rd party costs on site. No disruption to production.



## New Data for HRDD

Thousands of primary data points from key rights holders.



### Worker confidence

The HR teams at both factories asked for post-survey feedback from workers who expressed trust in the process because the promised license fee was paid and their responses were anonymous. Workers said they were comfortable with being honest about sensitive issues because they completed the survey in their own time and wherever they chose.



### Workers' independence

There was no opportunity for fear or coercion by employers. Every worker made the choice to opt-in and consistently responded over 5 days. They had confidence and trust in the system. They welcomed the license fee that recognised the data they supplied as being of value to the business.



### Direct follow-up

A key feature is the ability to follow-up directly after the first engagement. Once a MM-DWV survey is deployed workers can be asked anything, anytime via their personal mobile devices without necessarily seeking permission of the supplier or any intermediary.



### Rapid remedy

The supplier with issues acted quickly upon reviewing the data. They informed and trained workers for a follow-up survey within 6 weeks.



### Cost-effective

Both suppliers reported that the implementation was efficient and cost-effective compared with conventional audits, specifically because:

- All parties interacted by virtual meetings, with transcripts and recordings to reference and ensure transparency.
- The suppliers did not have to pay for travel, fees or per-diem expenses for consultants or auditors to be physically present. The costs for on-site deployment were part of the daily role of the HR teams.
- Posters were printed and placed by the HR teams leveraging their local knowledge of how the facility operated and the dynamic of the worker population.
- The operation of the factory was not disrupted. Workers participated in their own time and at locations of their own choosing.
- The Brand only had to approve one standard process and baseline survey to be used for both factories, and ready for similar suppliers in the future, reducing overall setup and implementation time.



### Building trust in HR

There were no external consultants or auditors. The workers recognised the HR team as driving the survey process and delivering the license fee.



### Exposure to Risk and Moral Hazard

This case found that if the Brand relied solely on the audit to make a regulatory compliance or consumer-facing claim, the Brand would be exposed to a significant risk of misreporting or greenwashing. Further, the finding of conformance is a moral hazard for the Brand assuming that there are no underlying issues at the supplier requiring action or preventative measures, presenting a risk of culpable negligence should issues escalate.



### Targeted recommendations

Each supplier received tailored suggestions based on what their own workers said. The data was not questioned as being honest and fair worker feedback, even on sensitive issues such as workplace safety and wage fairness.



### Independent audit verification

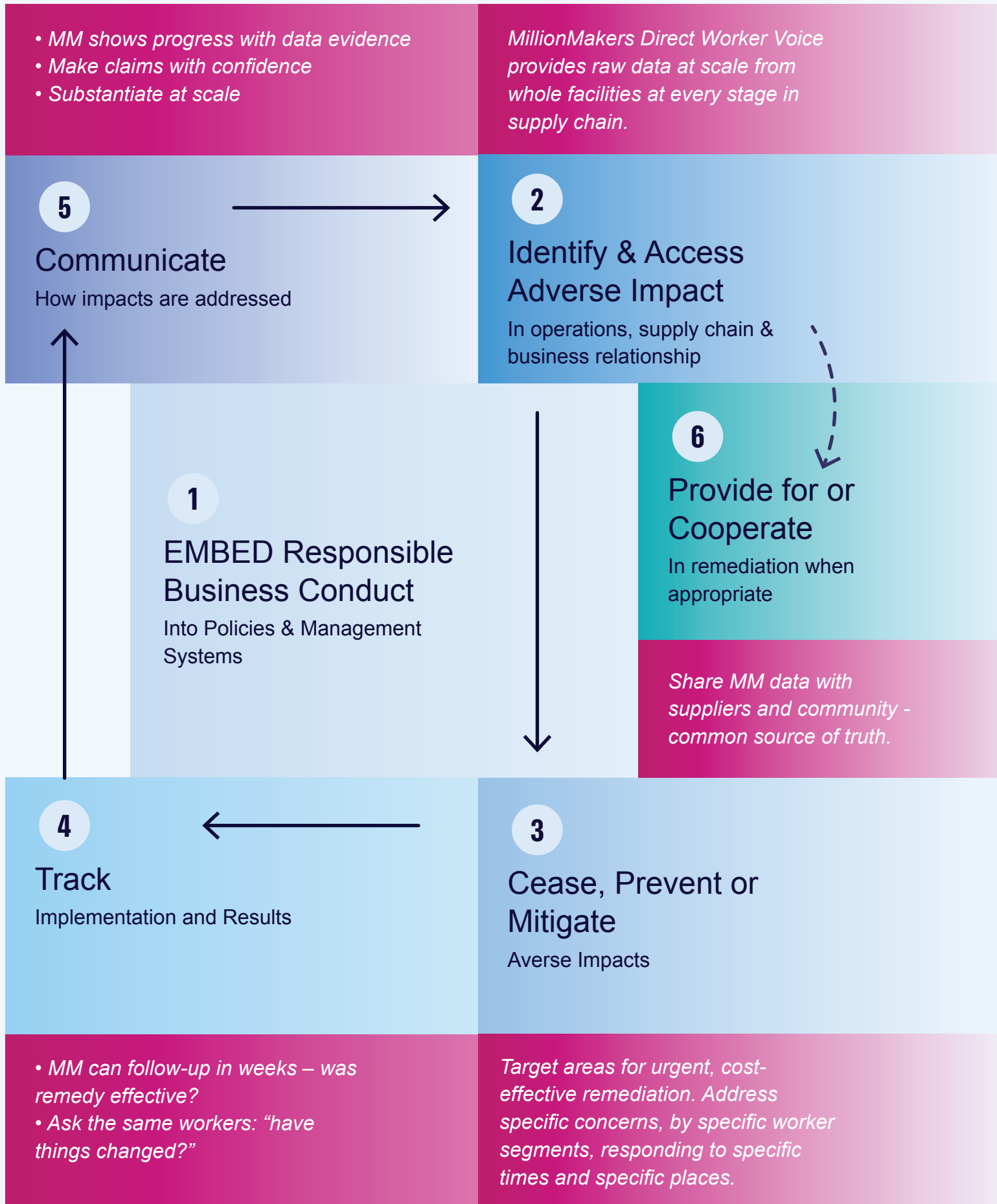
The Brand commissioning the MM-DWV survey was different to the brand that did the audit with the supplier three months earlier. This case showed that data from the worker population established a common source of truth between one supplier and two brands. This suggests that regular direct worker voice surveys can be applied and re-applied to several audit reports if brands require the supplier to adhere to different industry standards.



### New data for HRDD

This process delivers a large, rich volume of primary data from workers about their working conditions. No data of this type has been previously available at this scale or clearly calibrated against ILO indicators. Processes such as the OECD Due Diligence Guidance for Responsible Business Conduct may be greatly enhanced when a direct worker voice component is included.





# Challenges and Limitations



## Lack of Hardware

Some workers wished to participate but did not have smartphones capable of properly scanning the QR code or to receive mobile payments.



## Limited Sites

This study accounts for only two factories and may not be generalised as representing conditions across every supply chain site.



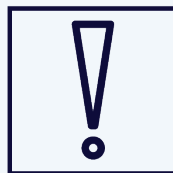
## Worker Categories

Response rates varied by different categories of workers. Future deployments should consider additional support for specific groups such as female factory workers or service staff.



## Question Interpretation

Even though the survey was delivered in local language, different types of workers may have understood certain questions differently. Uniform understanding should be reinforced to avoid any lack of clarity.



## Not a Grievance Mechanism

The Yes/No restriction on responses results in delivering worker sentiment. The aggregated and anonymised dataset means that specific issues affecting individual workers cannot be identified or addressed. However, the results enable grievances received through other mechanisms to be properly put into context – for example, if a grievance is raised is it an indicator of a wider problem in the worker population or is it a specific concern of a single individual.

# Conclusions

**Is a direct worker voice platform cost-effective at scale, does it reduce time and effort to remedy compared to social audits?**



This case found that MM-DWV engaged workers at scale cost-effectively. Worker voice data was delivered quickly by leveraging the factory's own HR teams, so there were no additional costs to the supplier for 3rd party auditors, consultants or contractors on site. MM-DWV also reduced the time and effort to remedy, with the total process taking less than 4 weeks from first supplier engagement to proposals for remedy after data analysis. By avoiding third party costs plus the usual production disruptions caused by interviews, the total cost of the project to the Brand and suppliers was significantly less than the equivalent cost of a conventional audit.

**Can a direct worker voice platform provide greater assurance than conventional audits alone that a factory is free of forced labour and exploitation?**



This case strongly suggests that a platform such as MM-DWV can replace sampled worker interviews and should be integrated into top-down audit processes. The case offers two compelling findings to support this suggestion. First, for the supplier, the speed and scale of MM-DWV enables remedy and effective intervention more rapidly than costly and infrequent conventional audits, the data plainly identifies worker concerns to target and prioritise remedy, and doing so can be part of a factory's HR regular operations without 3rd party costs or disruption to production. Second, for the Brand, the risk of not being aware of worker concerns, and basing assurance of compliance on scant evidence, carries the significant risk of making consumer-facing claims that can be easily proven false through simple questioning of workers by NGOs or regulators.

## Can a direct worker voice platform provide greater assurance than conventional audits alone that a factory is free of forced labour and exploitation?



This case showed that MM-DWV data provided greater assurance to all stakeholders when compared with the conventional industry-standard audit. The verified worker data enabled both the Brand and supplier to rapidly align on both what were genuine worker concerns as well as what action to take. The same data from workers was the basis for HRDD risk-mapping by the Brand by providing insights into overall worker sentiment and conditions that were not extrapolated from, or speculative of, how the auditor interpreted or gave weightage to interviews from a small sample of workers. The comparison of specific risks between the audit claim and the MM-DWV data revealed a significant gap. The small sample of workers used to claim conformance to the standard versus the much larger number of workers who did not agree with the auditor's claim highlighted a significant residual risk for the Brand. Importantly, the Brand relied on the audit claim for assurance that the factory was free of forced labour and exploitation and therefore did not presume any required remedy. The MM-DWV data conclusively showed the Brand that a significant number of workers had valid concerns that needed to be addressed. This enabled the Brand to remediate, the consequence of which is assurance that they are aware and can take action to make the factory free of forced labour and exploitation.

**A platform such as MM-DWV enables workers to supply data, rather than selectively collecting or subjectively extracting information in a conventional audit interview process. It provides data to evidence HRDD and remedy rapidly, leading to better working conditions. The granularity and breadth of the dataset provided greater context and assurance that the factory is free of forced labour and exploitation, avoiding the risk of being unaware of worker-level concerns.**

**The case concludes with the Brand finding value in a direct worker voice platform by employing the findings with its suppliers, developing a narrative on how it used MM-DWV to report on its sustainability performance, and expanding use of the platform to include more suppliers in its supply chain.**

# Appendix –

- MillionMakers™ is a Direct Worker Voice technology platform for Human Rights Due Diligence (HRDD) originally developed in 2021 as a workers' rights initiative by four non-profit organizations Bluenumber Foundation (US), Be Slavery Free (Australia), Mekong Club (Hong Kong) and Unseen (UK).
- Uniquely, MillionMakers™ licenses data from workers about their working conditions. This recognizes their rights as data creators and avoids data exploitation by extracting information from workers without compensation.
- The data MillionMakers™ delivers on working conditions is at scale, authentic and independently verified, and calibrated to the UN International Labour Organization (ILO) Indicators of Forced Labour.
- MillionMakers™ reports are specifically designed to meet expectations set by the OECD Responsible Business OECD Due Diligence Guidance for Responsible Business Conduct, the UN Guiding Principles, the EU Corporate Sustainability Due Diligence Directive, also regulation and legislation in several jurisdictions addressing Modern Slavery and Forced labour in supply chains.

## About MillionMakers™

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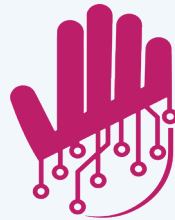
## Benchmark & Compare

How does MillionMakers data compare to audit reports from your supplier?

## Your forced labor declaration

Evidence-based, report to regulators, shareholder, investors, NGOs and stakeholders.

Worker  
Voice



Direct  
Data

## What's really happening

Do a multi-day, board population survey for your supplier workforce.

## Finding specific risks for each supplier

Are you at risk? To what extent?  
For which issues?

1



Self  
Onboarding

2



Daily  
Questions

3



Get  
Paid





**IGS** INITIATIVE FOR  
GLOBAL SOLIDARITY