



# A guide to completing the MSC Chain of Custody Labour Self-Assessment Form

August 2021

## Using this guide

This document provides guidance for MSC Chain of Custody (CoC) certificate holders required to complete the [Labour Self-Assessment Form V1.0](#).

Due to the global impact of COVID-19, the MSC issued [Derogation 7](#) in February 2021. This enables MSC CoC certificate holders to comply with Standard requirements by completing a self-assessment of their labour practices instead of a third-party audit.

## Who needs to complete the self-assessment?

**Certificate holders classified as ‘Standard Risk’ must complete the self-assessment, unless they are completing a third-party audit.**

The risk classification is based on Country Risk Indicators and Country Labour Risk Scoring tools, set out in [Tables 5 and 6 of the CoC Certification Requirements \(v3.1 pages 29 - 30\)](#). Your Conformity Assessment Body will confirm whether your business is classified as ‘Standard Risk’ or ‘Lower Risk’.

Certificate holders classified as ‘Lower Risk’ **do not** need to complete the form.

### Contact Us

Contact your local MSC Outreach representative or email [socialpolicy@msc.org](mailto:socialpolicy@msc.org) with any questions

## Question 1

### Do the sites hold any third-party social certification or hold any other types of approval or certification on labour practices, including second-party buyer audits?

If you answered **yes**, please provide a description of any labour audits or similar work you have undertaken, as well as certificate/audit status, audit frequency and any other relevant information.

**You should include details of any of the following carried out on-site in the past two years:**

- Labour or social audits
- Assessments
- Inspections
- Gap analyses

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the self-assessment form.

## Question 2

### Does the certificate holder engage with migrant and/or worker rights groups?

If you answered **yes**, please include a description of any organisations you engage with, including name and type of organisation, and describe your relationship with them.

**Examples of workers' or migrants' rights groups can include:**

- Non-governmental organisations
- Civil society groups

You can also describe any engagement with **embassies or consulates**, or any other entities where migrants' rights may be described.

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the box provided in the self-assessment form.

### Question 3

**Does the certificate holder publicly disclose their efforts to mitigate the risk of forced and child labour in their operations and/or supply chains?**

If you answered **yes**, please provide a description of any publicly declared statements, such as:

- Corporate social responsibility (CSR) report
- Modern slavery statement
- Any other publicly declared risk-assessments to address and reduce the risk of forced and child labour.

**Remember:** You can provide a link to the relevant documents if they are publicly available.

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the box provided in the self-assessment form.

### Question 4

**Does the certificate holder or site, as appropriate, provide all workers (permanent/temporary/contract) with contracts that describe terms of payment, overtime, ID documents?**

Please describe the nature of the contracts or legal work agreements for all workers involved in the handling of seafood, including:

- The types of employment contracts currently in use at the certificate holder’s site(s)
- The issues addressed in such agreements, including those listed in the question above
- How contracts differ, if at all, between the different types of worker groups. Contracts can differ in content, by length or term of service or any special conditions of work that may apply to a type or types of work.
- If recruitment agencies are used, please note whether the contract and payroll is with the agency or with the certificate holder

**Different worker groups may include those employed on contracts such as:**

- Permanent
- Seasonal
- Temporary
- Migrant
- Fixed term Contracts

If you do not provide any type of contract for seafood workers then please state this on the self-assessment form.

## Question 5

**Does the certificate holder or site, as appropriate, have policies or measures in place for staff voices to be heard, and to report and remediate any instances of forced or child labour?**

If you answered **yes**, please describe the methods and tools to inform and report on any incidents related to child and forced labour, or risks of it occurring, and the policies in place to address issues if/when they arise.

**Examples of reporting measures can include:**

- A staff hotline
- Procedures for reporting issues to the certificate holder or on-site representative.
- Company Grievance Mechanism

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the box provided in the self-assessment form.

## Question 6

**Does the certificate holder, or site, as appropriate, employ migrant labour to handle seafood products?**

If you answered **yes**, please provide the percentage of migrant workers who are:

- Employed annually to handle seafood products
- On temporary contracts

You only need to give an estimated percentage of the number of migrant workers employed.

You may describe the percentage employed annually or specify when and how they are used. e.g., *“temporary migrant workers are brought in during peak seasons to support the large volumes of seafood being processed. During peak seasons, they represent the majority of workers (around 70%) handling seafood”*.

**Migrant workers can refer to both foreign or regional migrant workers and can include:**

- Seasonal workers
- Those hired through contractors

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the box provided in the self-assessment form.

## Question 7

**Does the certificate holder or site, as appropriate, use recruitment agencies?**

**Please describe the typical methods used to recruit workers.**

If you answered **no**, please describe the typical methods used to recruit workers **directly**.

This can include hiring through:

- Job advertisements
- National apprenticeship schemes
- Word-of-mouth/ recommendations from existing or previous employees
- Temporary labour contractors

If you answered **yes**, please describe:

- The typical methods used to select recruitment agencies
- How credibility of the agency is ensured
- How recruitment agencies typically recruit workers, (see hiring methods list above for examples).

## Question 8

**Does the certificate holder or site, as appropriate, have a process in place to ensure no debt bondage or costs are imposed on workers related to their employment?**

If you answered **yes**, please describe the policies and practices in place, including:

- Comprehensive service level agreements
- Commitments to initiatives like the Employer Pays Principal

**Remember:** Foreign or migrant workers are at a higher risk of debt bondage (payment of debt through a worker's services) and costs relating to employment.

If you employ such workers it is particularly important that you provide details of the policies that ensure these practices do not occur

**Costs relating to employment can include:**

- Placement or brokerage fees
- Travel to the workplace
- Visa relating
- Medical costs
- Safety gear
- Clothing/protective gear
- Food at the workplace
- Communications access
- Remittance fees
- Repatriation

You may also provide details of any **legally permitted contractual costs** paid by foreign or other migrant workers to gain employment at the site.

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the box provided in the self-assessment form.

## Question 9

**Does the certificate holder or site, as appropriate, retain identity documents of workers?**

If you answered **yes**, please provide a description of how identity documents are held and the policies and practices in place to ensure that workers have easy, free and timely access to their documents.

**Examples of identity documents include:**

- National ID
- Passport
- Visas
- Original experience certificates
- Educational certificates
- Training certificates
- Any other original personal documents

If you answered **no** and do not retain identity documents of any staff at any time, no further information is needed.

## Question 10

### Are there policies and systems in place to ensure that all staff meet national minimum age requirements?

If you answered **yes**, please describe:

- National minimum age requirements for the site(s) in the certificate
- How national minimum age requirements are verified when appointing workers

You should also confirm that there are policies and procedures in place to meet national legal requirements for minimum age.

If you answered **no**, please provide any other information on efforts that you feel are relevant to this question in the box provided in the self-assessment form.

## Contact us

If you have any questions on the self-assessment template or guidance, please contact your local MSC Outreach representative or email [socialpolicy@msc.org](mailto:socialpolicy@msc.org)

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