

Questions for garment brands re Syrian refugees in Turkey

Policy:

1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? (If so please provide a link to this policy or provide it as an attachment). How is this policy communicated to suppliers in Turkey? – NEXT have the Syrian Refugee Action Plan that aims to prevent any discrimination and exploitation practices against Syrian Refugees. The Action Plan is provided in the attachment.

Audits/risk assessment:

2. How many first tier Turkish suppliers does your company have? - 22 suppliers (40 factories)
3. How many have been audited since 1 Jan 2015? What percentage of audits have been unannounced? – We have conducted 66 audits in first tier factories in 2015. Some of them were audited more than once due to their audit rating. 5% of these audits were unannounced. In light of the issues identified in announced audits, it has been decided that all audits from 2016 will be unannounced.
4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited since 1 Jan 2015 and what percentage of these audits have been unannounced? – NEXT carry out audits in second tier and third tier as well. We have conducted 131 audits in 2015 in 65 second and third tier suppliers. Some of them were audited more than once according to their audit rating. 38% of these audits were unannounced.
5. Do the audit & monitoring teams have Arabic-speakers who have received special training tailored to the situation of Syrian refugees, and do they speak with the workers confidentially? – The audit team in Turkey is composed of local people, who speak Turkish. All the worker interviews during audits are confidential and conducted in the absence of management. Interviews with the Syrian refugees are mostly conducted by the NEXT local CoP team. NEXT are in collaboration with a local NGO – accredited by The UN Refugee Agency (UNHCR) and working as one of the two implementing partners of UNHCR. In cases where it is not possible to communicate with the refugee worker because of the language barrier, the local team is provided help by this NGO's social workers, who speak Syrian Arabic and Kurdish.
6. How does your company address the possibility of undeclared subcontracting in its supply chain? – It is clearly communicated to the suppliers that undeclared subcontracting is not in line with NEXT Code of Practices and this message is underlined regularly in supplier seminars. During the unannounced audits, undeclared subcontracting is one of the issues audit team checks through the documents review. Addressing the possibility of undeclared subcontracting is also one of the targets of unannounced audits. We have identified suppliers broken this agreement of declaration of all sub contractors to Next and audits by Next to be done before any orders are replaced in sub contractor.
7. Has your company identified supplier factories employing Syrian refugees in 2015? If the answer is yes please state how many factories, if possible. – We have identified 10 factories employing Syrian refugees.
8. Has your company identified supplier factories employing Syrian child refugees in 2015? If the answer is yes please state how many factories, if possible. – We have identified Syrian

child refugees in two factories. It has been mandatory (and checked through our local teams) that our child labour remediation programme has been followed in all cases.

Remediation:

9. When Syrian refugees are identified at a supply factory, what process does your company expect the supplier to follow? In particular please state whether they remain in employment. – If the Syrian refugees identified are at working age, we expect suppliers to follow the Syrian Refugee Action Plan, which is provided in the attachment. The Syrian refugees identified remain in the employment and are paid gross minimum wage at least. For the Syrian children, we have a remediation plan (provided in the attachment) targeting child's schooling without any income loss, and if schooling is not possible due to the lack of a school nearby accepting Syrian children enrolled, child's access to the training courses - such as Turkish language, art classes for rehabilitation – provided by the local NGO in partnership. Syrian Child Labour Remediation Plan includes payment of legal minimum wage to the child's family, to the mother preferable, until the child reaches the working age.
10. Does your company have a remediation plan that addresses instances of discrimination/abuse against Syrian refugees in its supply chain? If yes please provide details of the plan, how it is communicated to refugees, and examples of outcomes if available. – The Refugee Action Plan is designed on the idea to prevent discrimination and abuse against Syrian refugees. It necessitates the supplier to provide the same working conditions defined in local laws to the Syrian refugees also, and to pay the gross minimum wage to prevent Syrian refugees from being cheap labour.
11. Does your company work with any local NGOs or trade unions to provide remediation services to refugees? – NEXT work with an NGO working with Syrian refugees, as well as other refugees, and who are one of the two implementing partners of UNHCR in Turkey.
12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this? – NEXT's action plan includes payment of social security fee to be paid by the employer directly to the refugee worker as part of the wage (the gross minimum wage).

Capacity building

13. Has your company undertaken any specific training with its first tier suppliers on this issue? – NEXT have conducted supplier seminars regularly every year where this issue is also covered. 2 presentations in 2015 to all our suppliers in turkey – specifically on the issue of Syrian Refugees & Modern slavery and Next requirements.
14. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier? – Suppliers beyond first tier have also participated in these sessions.

Stakeholder engagement

15. Does your company engage with local civil society groups and trade unions on this issue, for instance, in negotiating a policy position & carrying out risk mapping? – NEXT engage with a local NGO in shaping and implementing action plans and remediation plans regarding Syrian refugees' working conditions. Details about the NGO can be found above.
16. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)? – NEXT is in close communication with IndustriaALL at global and local level, however this does not cover specific issues such as

health and safety. The issue of health and safety conditions is covered in the Refugee Action Plan and the responsibility is on the employer.

17. Does your company work with trade unions or other partners to offer training and education programmes for refugees? – The NGO NEXT are partnering with provides training courses for Syrian refugees, which are also offered to the Syrian refugees we identified in the suppliers. In case the refugee wants to join in the training courses, the NGO provides local transportation tickets for enabling refugee to access to their community centre where the training is conducted. We have consistently engaged and communicated our actions / policy on syrian refugees with trade unions in the UK (TUC) and Turkey (Industrial).
18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees? – We engaged Turkish Government through the activities organised by ETI.

Other information

Please provide any further information regarding your company's activities on this issue which you think are relevant.

We are in process of shaping a programme for Syrian refugee women, which is to be an empowerment programme with a rights based approach, in partnership with local NGOs. In addition, our Action Plan and Remediation plan will be revised very shortly following the new regulation on work permits of Syrian refugees.