

# Questions for garment brands re Syrian refugees in Turkey

October 2016

## Company: Next

**1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? How is this policy communicated to vendors in Turkey?**

NEXT have the Syrian Refugee Remediation Plan that aims to prevent any discrimination and exploitation practices against Syrian Refugees. The [Remediation Plan is provided in the attachment](#). This was produced in conjunction with local NGOs working on the issue to ensure it provided the protection and support necessary for these vulnerable workers.

Next wrote to all of its Turkish suppliers in March 2016 – once the Turkish government issued the regulation on work permits of foreigners under temporary protection regime, which made it possible to legally employ Syrian refugees in various industries. Next clearly emphasised that Next Code of Practice Standards apply equally to Syrian refugees.

**2. How many first tier Turkish vendors does your company have?**

52 suppliers

**3. How many have been audited since in the last year? What percentage of audits have been unannounced?**

We have conducted 206 audits in Turkey between January 2016 and August 2016. Some factories were audited more than once due to their audit rating. 35% of these were 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 in the last year and what percentage of these audits have been unannounced?**

NEXT carry out audits in second tier and third tier as well. We have conducted more than 120 audits between January 2016 and August 2016 in second and third tier suppliers. Some of them were audited more than once according to their audit rating. 50% 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.

Next expects that all employees within its Supply Chains including Syrian refugees are treated with dignity and respect, have access to equal opportunities, and enjoy their human rights and worker rights without any discrimination. It is explicit that we require the same working conditions (regulated by Turkish laws) should be applied to Syrian workers, and communicated to them in their own languages.

**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 reasons of unannounced audits. We have identified suppliers who have not adhered to our zero tolerance on illegal subcontracting i.e have not declared all sub contractors. Our policy clearly states that suppliers must declare all sub-contractors to Next and will be audited by Next before any orders are placed.

**7. Has your company identified supplier factories employing Syrian refugees in the last year? If the answer is yes please state how many factories, if possible**

We have identified 4 factories and subcontractors employing Syrian refugees.

**8. Has your company identified supplier factories employing Syrian child refugees in the last year? If the answer is yes please state how many factories, if possible**

No

**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 Syrian refugees identified are at working age, we expect suppliers to follow the Syrian Refugee Remediation Plan, which is provided in the attachment. The Syrian refugees identified remain in employment and are paid at least the gross minimum wage as long as the number of refugees doesn't exceed the workplace quota set by the regulation. For cases where Syrian children are identified, 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 ), the child will have access to training courses - such as Turkish language, art classes for rehabilitation – provided by the local NGO in partnership. 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.**

Syrian Refugee Remediation Plan is designed to prevent discrimination and abuse against Syrian refugees. It demands the supplier provide the same working conditions defined in local laws to the Syrian refugees and to pay the gross minimum wage to prevent Syrian refugees from being used as 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 - HRDF, that has been working with Syrian refugees for a number of years (as well as other refugees) are one of the two implementing partners of UNHCR (United Nations High Commission for Refugees) in Turkey. Next are supporting HRDF with funding as well as using their expertise and knowledge to help in raising awareness with our suppliers in Turkey to encourage the legal employment of Syrian refugees whilst ensuring no exploitation of these vulnerable families is taking place.

Throughout 2015/16 Next has continued its commitment to ethical trade through a number of means. This has included advocating support and commitment within and to the ETI, where Next has

1. Presented at ETI and other meetings and seminars on: Contract Labour, Migrant Labour, Modern Slavery.
2. Next was a key brand in bringing the issues facing Syrian Refugees in the Turkey supply chain to the attention of ETI and its members.
3. Next initiated a number of discussions with key stakeholders within the ETI including NGOs and Trade Unions and locally in Turkey.
4. Next Code of Practice Turkey team regularly participate in and present at events including supplier forums and engagements with local trade unions, NGOs and other stakeholders on this issue.

**12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?**

The social security benefits are available for those who managed to obtain a work permit. For the transition period (being registered for 6 months) NEXT's remediation 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).

**13. Has your company undertaken any specific training with its first tier suppliers on this issue?**

NEXT conduct supplier seminars which are attended by first tier suppliers and registered sub contractors regularly every year where this issue is also covered. The last two we had were in August 2015 and March 2016. We are planning another one for November 2016. It will be specifically on the issues of Syrian Refugees, Modern slavery and Next Code of Practice 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 supplier training. Our Turkey regional manager has their own dedicated COP team whose role it is to build relationships with our suppliers' factories and sub contractors through direct training and support to achieve compliance with our ethical standards as well as undertaking monitoring through auditing. The team works closely with our Product teams to provide supplier performance updates, raise potential issues and deliver regular training to our suppliers.

In addition we have increased our local team by 25% in 2016 in light of the current issues in Turkey to ensure resources are available.

**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 IndustriALL 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 Syrian Refugee Remediation Plan and the responsibility is on the employer to adhere to the H&S requirements set out in the NEXT Code of Practice.

**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 identify in our supply chain. In case the refugee wants to join in the training courses, the NGO provides local transportation tickets to enable refugees to access 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 (IndustriAll) and through the ETI to all its members.

**18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?**

We have engaged the Turkish Government through the activities organised by multi stakeholder initiatives (ETI, ILO). We are also a member of the ETI Turkey programme

**19. 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.