

TRUSTED RECRUITER ALLIANCE

An Ethical Recruitment Framework for Seasonal Labor Programs

Version 2.0 - Revised Following Industry Cohort Review

Industry-Led | Role-Based | Good-Faith Implementation

A collaborative initiative convened by leading recruiters, employers, and facilitators

What Changed in Version 2.0

Version 2.0 reflects extensive feedback from the initial industry review cohort - recruiters, employers, attorneys, compliance professionals, and technology providers across the seasonal labor programs industry. The cohort strongly endorsed the framework's vision and philosophy. Their guidance focused on making it more practical, more precisely scoped, and more achievable for organizations of every size.

The central message from that review was clear: keep the vision, simplify the execution. This version does exactly that, with the following major revisions:

- **Role-based structure.** Obligations are now assigned to three distinct participant roles - Recruiter, Employer, and Filing Agent - according to the actual operational control each holds. An organization declares every role it performs and takes on the combined obligations.
- **Recruiters are not employer auditors.** The framework no longer implies that recruiters must verify housing, wages, or worksite conditions they do not control. Recruiter duties center on due diligence, disclosure, and investigating and referring worker complaints.
- **Good-faith implementation.** Language now emphasizes reasonable procedures, documented efforts, and continuous improvement rather than guarantees of outcomes beyond a member's control.
- **Flexible technology expectations.** The framework defines documentation outcomes members must be able to achieve, while leaving the choice of tools to each organization. Sophisticated systems are encouraged, not mandated.
- **Simplified structure.** The maturity tiers have been removed. Roles now carry the framework, with a straightforward self-certification and peer-review path.
- **Portable scope.** Built on the foundation of the United States seasonal labor programs, the framework keeps its operational standards country-agnostic so its principles can be applied wherever workers are recruited for seasonal agricultural and non-agricultural jobs.
- **Membership value.** A new section articulates the concrete benefits of membership - recognition, credibility, and market advantage.

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Preamble and Purpose

The United States seasonal labor programs for agricultural and non-agricultural jobs are among the most regulated labor pathways in the world. Employers, recruiters, and filing agents operating within them work under dense frameworks of law that set a high compliance floor before any additional standards are considered. That demanding regulatory environment is the foundation on which the Trusted Recruiter Alliance is built.

While the framework is grounded in the realities of the United States seasonal labor programs, its operational standards are written to be country-agnostic. The principles of ethical recruitment - transparency, informed consent, fair treatment, and accountability that follows control - apply wherever workers are recruited for seasonal agricultural and non-agricultural jobs, and the framework is intended to be portable to other programs and jurisdictions over time.

Yet legal compliance alone does not guarantee that workers are treated with dignity, that businesses build durable and reliable labor relationships, or that the industry earns the trust it needs to grow. The gap between the legal minimum and responsible practice is where reputational, operational, and ethical risk accumulates - for all parties.

The Trusted Recruiter Alliance (TRA) is an industry-led, voluntary coalition formed to close that gap. It is not a regulatory body, an enforcement organization, or a certification scheme imposed from outside. It is a collaborative alliance of recruiters, employers, and filing agents who share the belief that higher standards, consistently applied and reasonably implemented, are good for business, good for workers, and good for the long-term health of the industry.

A Framework Built Around Actual Responsibility

The defining principle of this framework is that obligations follow control. A recruiter operating in a country of origin cannot inspect housing at a destination worksite; an employer cannot oversee recruitment conversations happening abroad; a filing agent preparing petitions is not the party managing day-to-day employment.

Rather than assigning universal obligations to every participant, Version 2.0 allocates each standard to the role - or roles - that actually holds the operational control to meet it. This protects members from liability for practices outside their control while raising the real standard of care across the entire chain.

This document sets out the TRA Code of Standards. It is designed to be read, discussed, adopted, and improved by the industry members who use it. Version 2.0 is a working standard, refined through industry review and expected to keep evolving.

Section 1: Participant Roles and Scope

1.1 The Three Participant Roles

Every organization participating in the Alliance declares one or more of the following functional roles. Obligations attach to roles, not to organizations as a whole. An organization that performs more than one role takes on the combined obligations of each role it declares.

Role	Definition
RECRUITER	Any organization that identifies, screens, informs, or mobilizes workers in a country of origin for seasonal employment in a destination country. Includes recruitment firms, labor facilitators, and origin-country agents operating under a member's control.
EMPLOYER	Any organization that petitions for, hosts, houses, pays, or directs temporary workers at a destination worksite. Bears ultimate legal responsibility for employment conditions under destination-country law.
FILING AGENT	Any organization that prepares, submits, or manages immigration or labor petitions and related government filings on behalf of an employer. Includes attorneys, agents, and petition-preparation service providers.

1.2 Combined Roles

Many organizations operate across more than one role. The framework anticipates this directly. Common combinations include:

- Filing Agent + Recruiter: an organization that both prepares petitions and recruits workers takes on both obligation sets.
- Employer + Recruiter: a vertically integrated employer that recruits its own workforce takes on both obligation sets.
- Recruiter + Employer + Filing Agent: a fully integrated operation takes on all three.

When an organization holds multiple roles, it is accountable under each. Where two roles create overlapping duties, the higher standard applies. Declaring a role is a commitment to meet that role's obligations in good faith; it is not an admission of legal responsibility beyond what applicable law already imposes.

1.3 Supporting Participants

Organizations that do not directly recruit, employ, or file - such as technology providers, training organizations, transportation companies, and financial service providers - may participate as Supporting Participants. Supporting Participants endorse the Code, agree to conduct their services consistent with it, and are not subject to the full role-based obligation sets.

1.4 Responsibility for Agents and Subcontractors

Members remain responsible for ensuring that agents and subcontractors operating under their direction are aware of, and act consistently with, the obligations of the relevant role. Engaging a downstream party does not transfer a member's own role obligations, but a member is not responsible for conduct genuinely outside its knowledge and control where it has conducted reasonable due diligence.

Section 2: Guiding Philosophy and Program Context

2.1 Core Philosophy

The Trusted Recruiter Alliance is built on five commitments:

Five Commitments

1. OBLIGATIONS FOLLOW CONTROL - Members are accountable for what they can actually influence, not for outcomes beyond their operational reach.
2. GOOD FAITH OVER GUARANTEES - The framework evaluates whether members have implemented reasonable procedures and demonstrated genuine effort, not whether they have guaranteed perfect outcomes.
3. PRACTICAL OVER PERFECT - Standards that can be implemented by real organizations of varying size will do more good than ideal standards that exist only on paper.
4. WORKERS AS PARTNERS - Workers who return season after season are a competitive advantage, not a fungible cost input.
5. INDUSTRY ACCOUNTABILITY - The industry has a collective interest in its own reputation. Self-governance is preferable to externally imposed regulation.

2.2 Program Realities This Framework Accounts For

International frameworks such as IRIS and the IOM guidance offer valuable principles, but they were designed for broad global labor-mobility contexts and do not fully reflect the operational realities of structured seasonal labor programs. This framework accounts for the following:

Common Assumption	Program Reality and TRA Position
Workers should never bear any cost	Certain worker-borne costs (such as passport, medical, or consular-travel costs) are legally permitted in many programs. The standard is transparent disclosure and full, timely reimbursement where required - not that these costs never arise. No fee as a condition of employment, ever.
All costs are paid before departure	Many programs require reimbursement within a set period after arrival rather than pre-payment. TRA follows applicable law with enhanced transparency and clear written disclosure.
One party controls the whole chain	Recruitment, employment, and petition filing are frequently performed by different

	organizations. TRA assigns obligations to whichever role holds the relevant control.
Recruiters can monitor employment conditions	Recruiters operate in the country of origin and cannot audit destination worksites. TRA limits recruiter duties to due diligence, disclosure, and complaint referral.
Workers have no ongoing relationship with the employer	Returning workers are a feature of most seasonal labor programs. TRA encourages continuity of worker records and relationships.

2.3 Non-Negotiable Baselines

Regardless of role or context, the following are absolute and apply to every member:

- No worker is ever charged a fee as a condition of employment.
- No worker's identity documents are ever retained against their will.
- No worker is subjected to coercion, deception, forced labor, or debt bondage.
- Child labor prohibitions apply in full, in every jurisdiction.

Section 3: The Standards

The nine standards below define responsible practice. Each standard is tagged with the role or roles to which it applies. Members meet the obligations of the standards relevant to the roles they have declared. Throughout, obligations are framed in terms of reasonable procedures and good-faith implementation.

S-01

STANDARD 01: LEGAL COMPLIANCE BASELINE

Full compliance with applicable law is the floor, not the goal

APPLIES TO: RECRUITER EMPLOYER FILING AGENT

Statement

All members maintain good-faith, documented compliance with the laws applicable to their role and jurisdiction. Legal compliance is the minimum standard, not the aspiration.

Obligations by Role

Recruiter: Maintain valid licenses and authorizations required for recruitment in each country of operation; monitor and adapt to regulatory change affecting recruitment.

Employer: Maintain compliance with employment, wage, safety, and immigration obligations at the worksite under destination-country law.

Filing Agent: Maintain accuracy, completeness, and truthfulness in all petitions and government filings; keep current with filing requirements.

Common Requirements

- Designate a named compliance point of contact with documented authority for each declared role.
- Maintain a record of the legal requirements applicable to your role, reviewed periodically.
- Respond cooperatively and within required timeframes to any inquiry from a competent government authority.
- Keep role-relevant compliance records organized so they can be produced on reasonable request.

S-02**STANDARD 02: FEE AND COST TRANSPARENCY***Workers understand what they may pay, when, and how they are reimbursed*APPLIES TO: **RECRUITER** **EMPLOYER****Statement**

Fee transparency is a non-negotiable operating principle. No worker is charged a recruitment or placement fee as a condition of employment. Where worker-borne costs are legally permitted, they are clearly disclosed in advance and reimbursed in full and on time where required by applicable law.

Definitions

- **Prohibited Fee:** any payment charged to a worker as a direct or indirect condition of obtaining or keeping employment.
- **Permitted Worker-Borne Cost:** a cost legally permitted to be borne initially by the worker (such as passport, medical exam, or consular-travel costs) and subject to disclosure and, where required, reimbursement.
- **Employer-Responsible Cost:** costs that must be borne by the employer under applicable law, which may include destination-bound transportation, petition fees, and agent fees for the petition.

Obligations by Role

Recruiter: Disclose all anticipated worker-borne costs in writing and in advance; never charge a prohibited fee; never permit a downstream agent to charge one.

Employer: Fund employer-responsible costs and provide reimbursement of permitted worker-borne costs in full and on time where applicable law requires; reflect reimbursements clearly in pay records.

Common Requirements

- Provide each worker a written cost disclosure, in a language they understand, before departure.
- Be able to show, for each worker, what costs were disclosed and how any required reimbursement was handled.
- Any agent in the chain must acknowledge the fee prohibition in writing before engagement.

Recommended: Written Cost Disclosure Contents

- Worker name and contact information
- Employer and worksite information
- Job title, wage rate, and expected start date
- Itemized list of any costs the worker may advance, with amounts
- Whether and when each cost will be reimbursed
- A contact for questions or disputes about costs

S-03**STANDARD 03: INFORMED CONSENT AND DISCLOSURE***Workers decide based on accurate, complete information*APPLIES TO: **RECRUITER** **EMPLOYER****Statement**

Members ensure that every worker receives, in a language they understand, accurate and complete information about the job, wages, conditions, housing, and terms of employment before committing to travel. Consent is meaningful only when it is informed.

Obligations by Role

Recruiter: Present the job accurately; never make verbal representations that differ from the written terms; give the worker adequate time to review; confirm the worker understands the terms.

Employer: Provide accurate job orders and terms to the recruiter and worker; honor at the worksite what was represented during recruitment.

Common Requirements

- Provide each worker a copy of the work contract or job terms, in a language they understand, before departure.
- Conduct a pre-departure orientation covering duties, pay, conditions, worker rights, and how to raise a concern.
- Give workers reasonable time to review documents before signing.
- Inform workers that participation is voluntary and that they may withdraw before departure without penalty or debt.
- Document that disclosures were provided and acknowledged.

S-04**STANDARD 04: ZERO FORCED LABOR AND TRAFFICKING PREVENTION***Absolute. No exceptions. Applies to every role.*APPLIES TO: **RECRUITER** **EMPLOYER** **FILING AGENT****Statement**

Members maintain absolute zero tolerance for forced labor, debt bondage, document retention, labor trafficking, and restriction of movement. These prohibitions are unconditional and apply to every role and every member.

Absolute Prohibitions

- Forced Labor: no worker is compelled to work through force, threat, fraud, or coercion.
- Debt Bondage: no arrangement, formal or informal, that binds a worker through debt.
- Document Retention: no member or agent retains a worker's passport, identity, or immigration documents against the worker's will.
- Restriction of Movement: no confinement of workers to housing, worksites, or transport in ways that restrict freedom.
- Threats and Intimidation: no threats relating to immigration status, family, or future employment.
- Child Labor: no worker under the legal working age in either the origin or destination country is recruited or employed.

Common Requirements

- Train relevant staff to recognize indicators of forced labor and trafficking.
- Maintain a procedure for reporting suspected trafficking to the appropriate authorities.
- Report any credible allegation involving a member's own personnel to the TRA promptly.

S-05**STANDARD 05: RESPONSIBLE RECRUITMENT AND DUE DILIGENCE***Know your partners. Inform your workers. Investigate concerns.*APPLIES TO: **RECRUITER****Statement**

Recruiters conduct reasonable due diligence on the employers and partners they work with, employ trained recruiters, inform workers accurately, and take worker complaints seriously by investigating and referring them appropriately. Recruiters are not responsible for auditing or enforcing employer practices they do not control.

What Recruiters Are Responsible For

- Due diligence: before working with an employer or partner, take reasonable steps to confirm they are legitimate, authorized, and without a known pattern of abuse.
- Recruiter training: ensure active recruiters are trained on the Code, informed consent, and forced-labor indicators.
- Agent oversight: engage agents under a written agreement incorporating the Code; conduct reasonable monitoring; act on evidence of prohibited fees or deception.
- Complaint handling: receive worker complaints, investigate those within the recruiter's scope in good faith, and refer complaints about employment conditions to the employer and, where warranted, to the appropriate authority.
- Recordkeeping: keep per-worker records linking each worker to the agent involved, the disclosures provided, and the outcome of any complaint.

What Recruiters Are Not Responsible For

Recruiters are not expected to inspect housing, verify wage payments, monitor worksite safety, or audit employer compliance with destination-country employment law. Those duties belong to the Employer role and to the government agencies that regulate them. A recruiter's duty on employment-condition concerns is to investigate within its scope and refer - not to verify or enforce.

S-06**STANDARD 06: EMPLOYMENT CONDITIONS AND FAIR COMPENSATION***What was promised in recruitment is delivered at the worksite*APPLIES TO: **EMPLOYER****Statement**

Employers ensure that workers receive the wages, hours, benefits, and conditions specified in their contracts and required by law. Equal work earns equal pay. Deductions are taken only where legally authorized and disclosed.

Employer Obligations

- Pay at least the wage required by applicable law and the agreed contract wage, whichever is higher.
- Pay on the schedule specified in the contract and no less frequently than the law requires.
- Provide pay records, in a language the worker understands, itemizing wages and any deductions.
- Take only legally authorized deductions, disclosed in advance, that do not reduce pay below the applicable minimum.
- Not require hours beyond those in the contract without consent, and compensate overtime as required.
- Provide equal treatment: workers performing the same work as local workers receive equivalent wages and conditions.

S-07**STANDARD 07: HOUSING AND TRANSPORTATION***Safe, lawful, and as described*APPLIES TO: **EMPLOYER****Statement**

Where an employer provides or arranges housing or transportation, it meets applicable legal standards, matches what was disclosed during recruitment, and protects worker safety.

Employer Obligations

- Ensure any employer-provided housing meets applicable health and safety standards and is inspected before occupancy where required.
- Ensure housing matches what was described during recruitment; notify workers of any material difference.
- Ensure any charges for housing are lawful, disclosed in advance, and do not reduce pay below applicable minimums.
- Ensure vehicles used to transport workers are lawful, safe, and operated by licensed drivers.
- Provide or fund destination-bound and return transportation where required by applicable law.

The Recruiter role is responsible for accurately disclosing housing and transportation arrangements during recruitment, not for inspecting or verifying them.

S-08**STANDARD 08: WORKER VOICE, COMPLAINTS, AND PROTECTION***Workers can raise concerns. Concerns are taken seriously. No retaliation.*APPLIES TO: **RECRUITER** **EMPLOYER****Statement**

Members provide accessible ways for workers to raise concerns, respond to those concerns in good faith, and prohibit retaliation. Each role handles complaints within its scope and refers those outside its scope to the party that can act.

Obligations by Role

Recruiter: Provide workers a way to raise concerns about recruitment; investigate recruitment-related complaints in good faith; refer employment-condition complaints to the employer and, where warranted, to authorities; never retaliate.

Employer: Provide workers a confidential way to raise workplace concerns that does not require going through a direct supervisor; investigate and respond in good faith; never retaliate.

Common Requirements

- Make the complaint process known to workers in a language they understand.
- Acknowledge complaints promptly and respond within a reasonable time.
- Keep a record of complaints received and how they were handled or referred.
- Prohibit any adverse action against a worker for raising a concern in good faith.
- Inform workers of relevant external resources, including applicable government complaint channels.

S-09**STANDARD 09: DATA, DOCUMENTATION, AND RECORD KEEPING***Keep good records. Protect worker data. Produce records when asked.*APPLIES TO: **RECRUITER** **EMPLOYER** **FILING AGENT****Statement**

Members keep documentation appropriate to their role, protect worker personal data, and are able to produce role-relevant records on reasonable request. The framework defines the documentation outcomes members should achieve and leaves the choice of tools to each organization.

Data Protection (all roles)

- Collect only the personal data needed for the member's role and program administration.
- Keep worker data secure, with access limited to those who need it.
- Do not share worker data beyond what the role requires or the worker has consented to, except as required by law.
- Provide workers reasonable access to their own records on request.
- Notify affected workers and the TRA of any significant breach of worker data without undue delay.

Documentation Outcomes (flexible in method)

Members should be able to achieve the following outcomes. How they do so - purpose-built software, a managed database, or another reliable system - is left to each organization. As organizations grow, more capable systems are encouraged:

- Retrieve the records for an individual worker on reasonable request, without extensive manual reconstruction.
- Show when key documents (disclosures, contracts, complaint responses) were created or provided.
- Maintain continuity of a returning worker's records across seasons rather than starting from zero each time.
- Produce role-relevant records to a TRA reviewer on reasonable notice during verification.

Technology: An Enabler, Not the Standard

The framework does not require any particular software or vendor. What it asks is that members be able to produce accurate, organized, retrievable records appropriate to their role.

For most organizations, meeting these outcomes reliably - especially retrieving per-worker records quickly and maintaining continuity across seasons - is far easier with a purpose-built recordkeeping system than with paper or disconnected spreadsheets. Members are free to choose how they meet the outcomes, and are encouraged to adopt more capable systems as they grow.

Suggested Record Retention

Record Type	Suggested Retention
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Worker contract / job terms	Duration of employment + 3 years
Cost disclosures	Duration of employment + 3 years
Complaint records and outcomes	3-5 years
Agent agreements and due diligence	Duration of engagement + 3 years
Recruiter training records	Duration of employment + 3 years
Petitions and government filings (Filing Agent)	As required by applicable law

Section 4: Membership Roles and Participation

Membership is organized around the roles an organization performs, not around maturity tiers. This keeps the structure simple and ensures each member is measured only against the obligations relevant to what it actually does.

4.1 How Membership Works

- An organization applies for membership and declares each role it performs: Recruiter, Employer, Filing Agent, or a combination.
- The organization commits, in good faith, to the obligations of each declared role.
- Organizations that support the industry without directly recruiting, employing, or filing may join as Supporting Participants.
- An organization may add or remove roles as its business changes, updating its obligations accordingly.

4.2 Declared Roles Example

Organization Type	Declared Roles and Combined Obligations
Origin-country recruitment firm	Recruiter. Obligations: S-1, S-2, S-3, S-4, S-5, S-8, S-9.
Destination employer using an outside recruiter	Employer. Obligations: S-1, S-2, S-3, S-4, S-6, S-7, S-8, S-9.
Petition-preparation firm / attorney	Filing Agent. Obligations: S-1, S-4, S-9.
Integrated employer that recruits its own workers	Employer + Recruiter. Combined obligations of both roles.
Firm that files petitions and recruits	Filing Agent + Recruiter. Combined obligations of both roles.
Technology or training provider	Supporting Participant. Endorses the Code; not subject to full role obligations.

4.3 Consequences of Non-Compliance

The Alliance emphasizes remediation over punishment, while reserving firm consequences for the most serious conduct:

- Minor issue: a good-faith corrective action plan, with a reasonable window to remediate; no public disclosure.
- Serious issue: suspension of the affected role pending remediation; disclosed within the membership.
- Critical violation (forced labor, trafficking, or charging prohibited fees): immediate suspension, referral to authorities, and potential permanent exclusion.

Section 5: Verification and Good-Faith Compliance

Verification is deliberately simple and scaled to good-faith implementation. It grows with the member and with the Alliance rather than imposing heavy oversight from day one.

5.1 A Two-Step Path

- Step 1 - Self-certification: at onboarding, a member reviews the obligations for each declared role, completes a self-assessment, and certifies good-faith implementation, noting any areas still in progress.
- Step 2 - Peer review: within a reasonable period, a fellow member with no commercial conflict conducts a supportive peer review against the member's declared-role obligations, focused on whether reasonable procedures are in place.

5.2 What Verification Looks For

Verification asks whether a member has implemented reasonable procedures and made good-faith efforts appropriate to its declared roles - not whether it has guaranteed outcomes beyond its control. Reviewers confirm that role-relevant records can be produced on reasonable request and that the core worker protections are in place.

5.3 Scaling Over Time

As the Alliance matures, it may introduce more structured or independent verification for members who wish to demonstrate a higher level of assurance. Any such enhancement will be optional, developed with the membership, and phased in - never imposed as an entry barrier.

Section 6: The Value of Membership

Membership is not only a set of responsibilities - it is a source of recognition, credibility, and competitive advantage. The industry review cohort identified the value proposition as potentially the single strongest long-term incentive for participation. The Alliance is committed to making membership visibly worth it.

6.1 Recognition and Credibility

- A recognized ethical-recruitment designation that members can display to employers, workers, and partners.
- Public listing as a member committed to the Code, differentiating members from unaccountable operators.
- Standing as part of an industry-led movement that is policing itself before external regulation requires it.

6.2 Market and Business Advantage

- Employer preference: employers increasingly want recruitment partners who reduce their compliance and reputational risk.
- Government confidence: a credible self-governance standard builds trust with the agencies that regulate these programs.
- Buyer and retailer confidence: as supply-chain scrutiny grows, ethical-recruitment credentials become a commercial asset.
- Worker preference: workers return to, and refer others to, recruiters and employers who treat them fairly.

6.3 Shared Infrastructure and Support

- Access to shared templates, training materials, and self-assessment tools that lower the cost of compliance.
- A community of peers working through the same operational challenges.
- A voice in shaping the standard and, over time, in industry engagement with policymakers and buyers.

6.4 Where This Is Headed

The Alliance intends to grow into industry infrastructure: portable worker records, buyer and retailer recognition of ethical recruiters, shared training programs, and access to implementation funding. Founding members help shape that future and are positioned first as it arrives.

Section 7: Implementation and Continuous Improvement

7.1 Phased, Achievable Rollout

The Alliance recognizes that organizations vary widely in size and sophistication. Implementation is phased so that participation is achievable for everyone:

- Phase 1 - Commit and self-assess: endorse the Code, declare roles, complete a self-assessment, and begin closing gaps in good faith.
- Phase 2 - Establish reasonable procedures: put in place the core documentation and worker protections for each declared role.
- Phase 3 - Peer review and refine: complete a supportive peer review and continue improving.
- Phase 4 - Grow capability: adopt more capable systems and, if desired, higher assurance as the organization matures.

7.2 Industry Reality and Gap Analysis

A foundational Alliance project is a candid Industry Reality and Gap Analysis - an honest assessment of the structural and economic barriers to responsible recruitment. Findings are shared with members in aggregate and used to shape the practical roadmap.

7.3 Shared Tools (Optional, Not Mandated)

The Alliance will make optional shared resources available to lower the cost of participation. Members choose whether and how to use them:

- A customizable written cost-disclosure template.
- Self-assessment and gap-analysis worksheets by role.
- Training materials on the Code, informed consent, and forced-labor indicators.
- Guidance on documentation outcomes and the kinds of systems that meet them.

Section 8: Governance

Governance is intentionally lean at the outset and designed to grow alongside membership rather than ahead of it.

8.1 A Lean Starting Structure

- A small Governing Council of founding members and elected representatives stewards the Code.
- Standing committees are added only as the need for them becomes real.
- Early oversight relies on self-certification and supportive peer review rather than heavy audit machinery.

8.2 The Governing Council

- Maintains and amends the Code, with a member comment period before changes take effect.
- Oversees role definitions, membership, and the handling of serious and critical issues.
- Publishes a periodic progress report to members.

8.3 Amendments

The Code may be amended by a supermajority of the Governing Council following a member comment period. Members receive notice of proposed amendments and may comment before they take effect.

8.4 Relationship to Government

The Alliance is a voluntary, industry-led initiative, not a government body and not a substitute for legal compliance. It cooperates with regulators and may offer industry perspective on policy, but it does not enforce law.

Appendix A: Obligations by Role (Quick Reference)

The table below shows which standards apply to each role. An organization with multiple roles combines the applicable standards.

Standard	Recruiter	Employer	Filing Agent
S-1 Legal Compliance Baseline	YES	YES	YES
S-2 Fee and Cost Transparency	YES	YES	-
S-3 Informed Consent and Disclosure	YES	YES	-
S-4 Zero Forced Labor and Trafficking	YES	YES	YES
S-5 Responsible Recruitment and Due Diligence	YES	-	-
S-6 Employment Conditions and Compensation	-	YES	-
S-7 Housing and Transportation	-	YES	-
S-8 Worker Voice and Complaints	YES	YES	-
S-9 Data and Record Keeping	YES	YES	YES

Appendix B: Glossary

Term	Definition
Recruiter	An organization that identifies, informs, or mobilizes workers in a country of origin for seasonal employment in a destination country.
Employer	An organization that petitions for, hosts, houses, pays, or directs temporary workers at a destination worksite.
Filing Agent	An organization that prepares or submits immigration or labor petitions on behalf of an employer.
Supporting Participant	An organization that supports the industry (e.g., technology, training, transportation, finance) and endorses the Code without taking on full role obligations.
Prohibited Fee	Any payment charged to a worker as a condition of obtaining or keeping employment.
Permitted Worker-Borne Cost	A cost legally permitted to be borne initially by the worker, subject to disclosure and, where required, reimbursement.
Good-Faith Implementation	Putting reasonable procedures in place and making genuine efforts to comply, as distinct from guaranteeing outcomes beyond a member's control.
Due Diligence	Reasonable steps taken to confirm that a partner is legitimate, authorized, and without a known pattern of abuse.

Trusted Recruiter Alliance - Ethical Recruitment Framework, Version 2.0
Revised following industry cohort review - for continued industry comment