

# Responsible recruitment in the Malaysian medical gloves industry: Impacts, challenges and recommendations

## Research summary

June 2026

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Research by:

This is a Research Summary of the report: *Responsible recruitment in the Malaysian medical gloves sector: impacts, challenges and solutions*, a research project funded by the Modern Slavery and Human Rights Policy and Evidence Centre (PEC), which in turn is funded and supported by the UK Arts and Humanities Research Council (AHRC). The full report can be accessed [here](#).

The research was conducted by Brighton and Sussex Medical School and University of Sussex researchers in partnership with researchers at the University of Newcastle, Impactt Limited and Unseen UK.

Acknowledgements: We thank all research participants for generously sharing their time and valuable insights. We are also grateful to Dhurba Mijar (Migration Dristi), Abdullah, Andy Hall, and the lived-experience consultants for their thoughtful input, and to Pierre Nouvellet for his support with statistical analysis.

The PEC has supported this independent research project and worked closely with the research team to produce this Research Summary. However, the views expressed in this summary and the full report are those of the authors and not necessarily of the Modern Slavery PEC.

This project was funded through an open call for proposals to examine how can we more effectively prevent modern slavery.

## Key findings

- Employer Pays Principle (EPP) and associated responsible recruitment efforts have significantly reduced debt bondage.
- Recruitment-stage forced labour indicators have declined sharply.
- Working and living conditions show significant improvements, but risks remain, including increased workplace threats and intimidation (particularly for Bangladeshi workers), and reduced confidence in grievance mechanisms.
- Impacts are uneven across nationalities and supply chain tiers, with gains concentrated among Nepali workers in Tier 1 factories.\*
- The scalability and durability of gains are constrained by the high implementation costs for employers, declining gloves demand, structural recruitment corridor challenges, and limited buyer willingness to share costs, with continued buyer pressure needed to sustain and scale implementation.

## \*Supply Chain Tiers

Supply chains are structured into **tiers**, each representing a distinct stage in the production of a good.

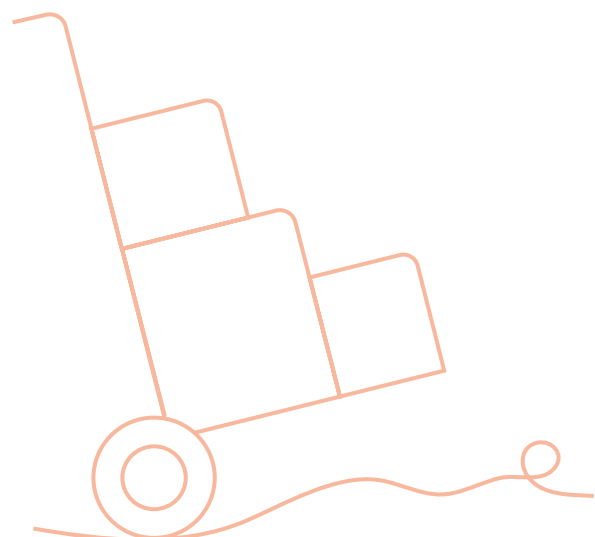
**Tier 1 suppliers** typically provide the final product directly to buyers (e.g. finished medical gloves).

**Tier 2 suppliers** and beyond provide components, raw materials, or services used by Tier 1 suppliers to produce the final product (e.g. nitrile or ceramic glove moulds used in glove manufacturing).

## Why responsible recruitment matters

Recruitment fees are a **core driver of debt bondage and forced labour**. When workers pay large sums to secure employment – often financed through high-interest loans – their ability to avoid abuse or leave employment is severely constrained.

The Employer Pays Principle addresses this risk directly by removing debt at the point of recruitment, rather than relying on remediation after harm has occurred.



# Background

The Malaysian medical gloves sector is a critical node in global healthcare supply chains, supplying hospitals and public health systems worldwide. This report evaluates the impacts of the Employer Pays Principle (EPP) and wider responsible recruitment efforts in the sector, with a particular focus on preventing debt bondage and addressing other indicators of forced labour, while also assessing the challenges associated with these efforts, their drivers, and their potential solutions.

At the centre of this research is an evaluation of the EPP, defined as an employer commitment to bear the full costs of labour recruitment, thereby eliminating worker-paid fees. The EPP is a key mechanism for preventing modern slavery and improving labour standards in global supply chains. It is distinct from, though closely related to, responsible recruitment, which provides a broader framework encompassing fair treatment, transparent contracts, ethical sourcing, and adherence to labour standards.

The Malaysian medical gloves industry was brought into the global spotlight in 2020 during the Covid-19 pandemic, when surging gloves demand and subsequent scrutiny of the industry's labour practices exposed significant labour rights risks and mounting evidence of forced labour. The industry has since implemented substantial remediation measures, including recruitment fee reimbursements from 2020 and the introduction of responsible recruitment programmes from 2022 onwards. Building on the evidence base established in our 2020-21 research,<sup>1,2</sup> this report captures changes over time in policy, practice, and impact; provides evidence on where progress has been made and where efforts have fallen short; and recommends what is required to secure further improvements.

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1. Bhutta M, Bostock B, Brown J, Day E, Hughes A, Hurst R, Trautrim A & Trueba M. (2021). Forced Labour in the Malaysian Medical Gloves Supply Chain before and during the COVID-19 Pandemic: Evidence, Scale and Solutions. London: University of Newcastle. Available here: <https://eprints.ncl.ac.uk/279369>

2. Bhutta M, Bostock B, Brown J, Day E, Hughes A, Hurst R, Trautrim A & Trueba M. (2021). Forced Labour in the Malaysian Medical Gloves Supply Chain during the COVID-19 pandemic. Research Summary. London: Modern Slavery Policy & Evidence Centre. Available here: <https://www.modernslaverypec.org/resources/forced-labour-malaysia-medical-gloves>

# Methodology

We employed a mixed-methods, pre-post research design to assess changes associated with the implementation of responsible recruitment measures since 2022, comparing baseline conditions (2020-21) with follow-up findings (2025-26). Quantitative data were drawn from a baseline survey of 1,491 medical glove workers and a follow-up survey of 83 workers working in Malaysian medical gloves factories. While the follow-up sample is smaller, findings are largely statistically significant, span multiple factories, and are corroborated by interview and stakeholder engagement workshop data, providing a robust basis for validation. Additional survey data were collected from workers in ceramic mould factories supplying the gloves sector. Survey data covered recruitment fees, loans and repayments, forced labour indicators, and working and living conditions, and was analysed using descriptive statistics and logistic regression ( $p < 0.05$ ). For recruitment-stage forced labour indicators, the EPP is treated as the most causal influence; for working and living conditions, wider regulatory and industry factors are also considered.

Qualitative data included semi-structured interviews with 21 glove workers across both periods (11 in 2020-21 and 10 in 2025-26), alongside 8 industry stakeholder interviews in 2025-26 (including company managers, civil society representatives, and responsible recruitment consultants). These explored recruitment experiences, implementation of fee reimbursement, workplace conditions, and perceived impacts, barriers and enablers of EPP and responsible recruitment.

Findings were triangulated through a comprehensive literature and document review, situating the results within wider regulatory and industry developments. Recommendations were subsequently validated through three online stakeholder engagement workshops attended by 22 participants.<sup>3</sup> Participants included:

- Malaysian gloves industry actors, including manufacturers, industry association representatives, and EPP and sustainability consultants;
- UK-based healthcare procurement managers and suppliers; and
- European healthcare procurement managers and government officials.

In each workshop, the research team presented preliminary findings and recommendations to stimulate discussion on current advances, ongoing challenges, and potential solutions. Stakeholders reflected on the applicability of recommendations and identified what is working most effectively in preventing modern slavery and where further development is needed.

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3. Additional dissemination workshops with key UK policymakers are currently in progress.

**Co-production and ethics:** Data collection tools were co-produced with four consultants with lived experience of modern slavery, who also contributed to analysis and write-up alongside the research team.<sup>4</sup> Ethical approval was granted by the University of Sussex. Participation was voluntary, confidential, and anonymised, with appropriate safeguards in place.

## Findings

### **Employer Pays Principle (EPP) and associated responsible recruitment practices have significantly reduced debt bondage.**

Workers paying recruitment fees fell from 92% (2020-21) to 3% (2025-26), while reliance on recruitment-related loans declined from 43% to 3% ( $p < 0.05$ ).

All workers recruited prior to EPP implementation received full reimbursement of fees and loan interest, significantly reducing financial vulnerability and increasing labour mobility.

*“If workers get free job we can save money from the first month of employment.”*

**Nepali worker**

Continued reports of informal or “fake zero-fee” practices indicate that the elimination of worker-paid costs remains incomplete, with hidden charges persisting even within nominally zero-cost systems:

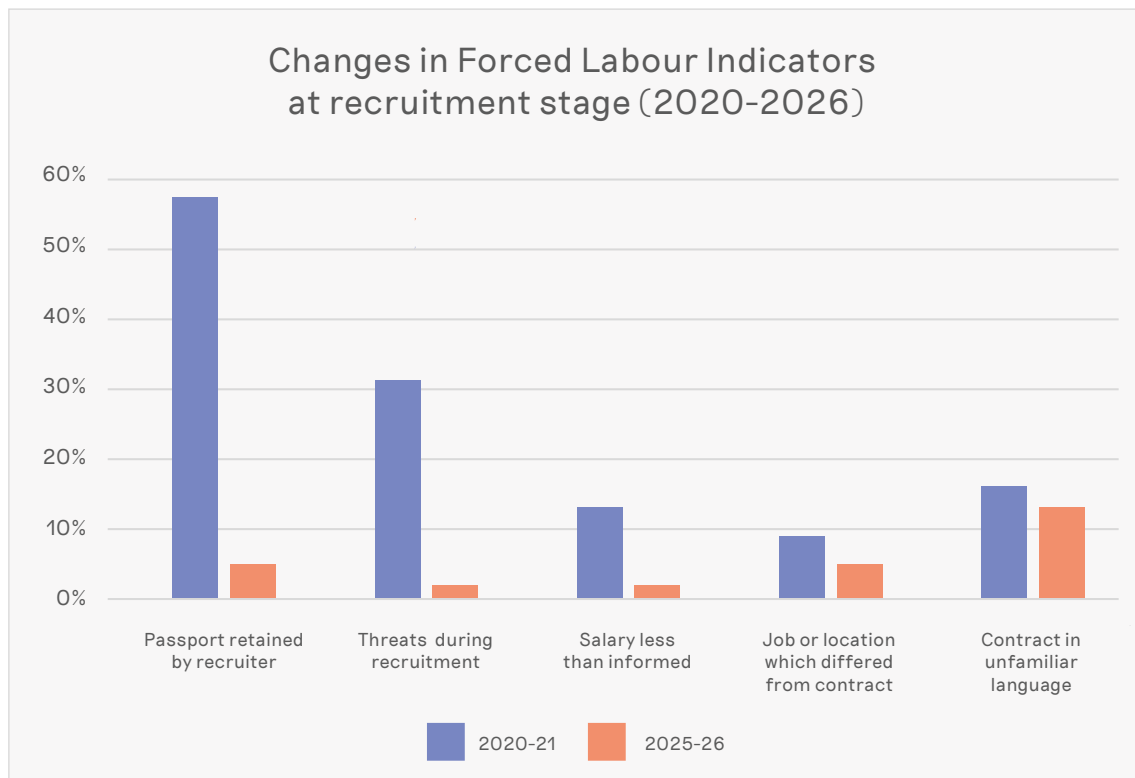
*“Many companies and agencies do fake zero cost ... they say zero cost, but they still charge money illegally.”*

**Nepali worker**

4. Trueba M & Hughes A. (2025) Engaging survivors in applied forced labour research. 9th Regulating Decent Work Conference, ‘Strengthening labour institutions and worker voice to deliver decent employment’. 2-4 July 2025. Geneva, Switzerland. International Labour Office. Available here: [https://sussex.figshare.com/articles/report/Engaging\\_survivors\\_in\\_applied\\_forced\\_labour\\_research/32268774](https://sussex.figshare.com/articles/report/Engaging_survivors_in_applied_forced_labour_research/32268774)

## Recruitment-stage forced labour indicators have declined sharply.

Passport retention by recruiters fell from 57% to 5%, and threats or intimidation related to fee disclosure during recruitment dropped from 31% to 3% ( $p < 0.05$ ).



## Important improvements in working and living conditions, but risks persist.

Positive changes include reduced working hours (12.02 to 10.30 per day), improved access to free healthcare (lack reduced from 50% to 8%), increased feelings of safety at work (16% to 5%), and a reduction in workers having only one day off per month (from 31% to zero). Employer retention of passports has been eliminated, and the proportion of workers feeling unable to leave employment has declined from 47% to 14%, reflecting reduced debt bondage.

However, reported workplace threats and intimidation have increased from 7% to 20% ( $p < 0.05$ ). Trust in grievance mechanisms has also deteriorated significantly, with 61% of workers reporting low or inconsistent confidence in raising concerns (up from 18% in 2020-21).

*“I’ve made a complaint before, and my identity was not kept anonymous.”*

**Bangladeshi worker**

*“Previously the company had grievance mechanisms... including HR and a hotline but now they have only HR.”*

**Bangladeshi worker**

## **Impacts are highly uneven across nationalities and supply-chain tiers.**

Gains are concentrated among Nepali workers in Tier 1 factories. In contrast, progress for Bangladeshi workers remains constrained by structural challenges in the Bangladesh–Malaysia recruitment corridor, including the concentration of recruitment control among a limited number of fee-charging agencies (the syndicate), coordinated fee-fixing, and weak enforcement. The restriction of ethical recruitment opportunities in this corridor has diverted Bangladeshi workers into lower-oversight sectors with higher risks of forced labour.

At Tier 2, all 12 surveyed ceramic glove mould workers continued to pay recruitment fees, and forced labour indicators remain substantially higher than in the gloves sector. Specifically, 100% of Tier 2 workers reported paying recruitment fees (averaging USD 3,851), 100% experienced recruiter document retention, and 80% reported recruiter threats, compared to 3%, 5%, and 3% respectively among Tier 1 gloves workers. These inequalities likely reflect the concentration of buyer-driven responsible recruitment pressures at Tier 1, leaving lower tiers of the supply chain largely outside the reach of such standards.

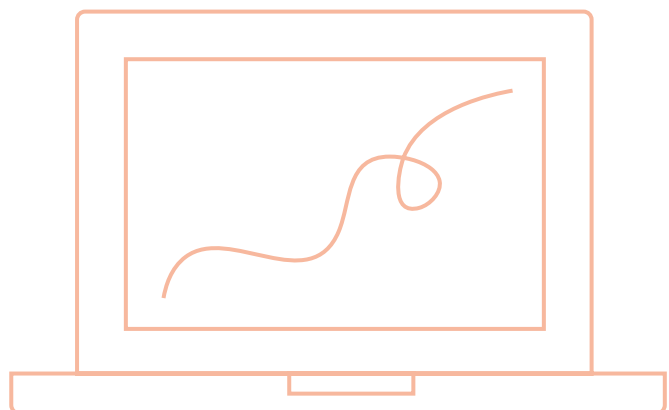
## Scalability and durability of gains remain uncertain.

Despite clear evidence of positive impact, the implementation of EPP and responsible recruitment remains uneven and fragile. Corporate commitment is largely driven by external pressures – such as buyer requirements, import bans, and civil society scrutiny – rather than being embedded in internal practices, with inconsistent enforcement across the sector.

High implementation costs, operational complexity across origin countries, and fragmented governance frameworks enable continued leakage of informal fees, often shifting financial pressure onto recruiters and, indirectly, workers. Buyers often negotiate strongly for lower prices from manufacturers, who in turn often reduce margins passed to recruiters; many recruiters then recover costs through fees charged to workers, creating a chain of downward cost transfer that undermines responsible recruitment at every level.

Buyer demands for EPP compliance are rarely matched by price premiums or adjusted purchasing practices in this low-margin market, while declining glove demand further constrains sustainability.

Without stronger regulatory coordination, viable financing models, and sustained buyer pressure, the durability and scalability of responsible recruitment gains remain at risk.



# Key recommendations

Advancing responsible recruitment and its benefits for workers requires coordination across supply chains and between buyer, host and worker origin countries; as well as concerted action by buyers, employers, recruitment agencies, and governments.

## Procuring governments

Introduce mandatory human rights due diligence, shifting from voluntary and transparency-only approaches to enforceable legal accountability, explicitly identifying recruitment fees and debt bondage as key risk factors.

Embedding legal liability for these harms would sustain pressure on buyers to require their suppliers to maintain ethical recruitment practices, particularly if adopted widely across procuring countries.

## Buyers and procurement organisations

Embed zero-fee recruitment requirements into procurement contracts and extend these standards beyond Tier 1 suppliers through cascading contractual obligations.

Support implementation through price premiums or cost-sharing mechanisms, conditional on independent verification, to ensure suppliers can sustain compliance and reduce financial displacement along the supply chain.

*“When I went to zero fees I lost 50% of my business as buyers didn’t want to pay the extra.”*

Industry stakeholder reporting a conversation with a recruitment agent

## Malaysian (host) government

Strengthen enforcement of existing forced labour and responsible recruitment regulations, including tighter oversight of recruitment syndicates and intermediaries, backed by adequately resourced and independent enforcement bodies.

Update bilateral Memorandums of Understanding with origin countries to prioritise ethical recruitment and support expansion of responsible recruitment across additional migration corridors.

## Worker origin country governments (Nepal & Bangladesh)

Strengthen and enforce ethical recruitment frameworks by implementing or updating legislation aligned with zero-fee recruitment principles, introducing effective penalties (e.g. substantial fines, licence revocation), and formalising the role of labour sub-agents within regulatory systems.

Reduce worker exposure to fee-charging by simplifying and centralising recruitment processes, and lowering or eliminating administrative costs (e.g. medical tests, visas).

Improve transparency, awareness, and reporting by providing targeted pre-departure information on migration risks and worker rights, and establishing accessible channels for reporting illegal fee-charging and exploitative practices.

Establish safe return and support mechanisms for workers experiencing exploitation or raising concerns in their destination country.

## Manufacturers

Eliminate worker-paid recruitment fees by contracting only with verified zero-fee recruitment agencies and providing upfront financing to cover recruitment costs.

Strengthen oversight of recruitment processes through due diligence on agencies, independent audits, and worker interviews at key stages (pre-departure, arrival, and in employment) to detect hidden fees.

Ensure remedy and worker protection by guaranteeing unconditional reimbursement of any recruitment fees identified, and providing access to independent third-party advice and trusted, anonymous grievance mechanisms.

## Recruitment agencies

Adopt and operationalise a “no worker should pay for their job” standard, ensuring that all recruitment, travel, visa, and associated administrative costs are borne by employers, not workers.

### Practical steps to responsible recruitment

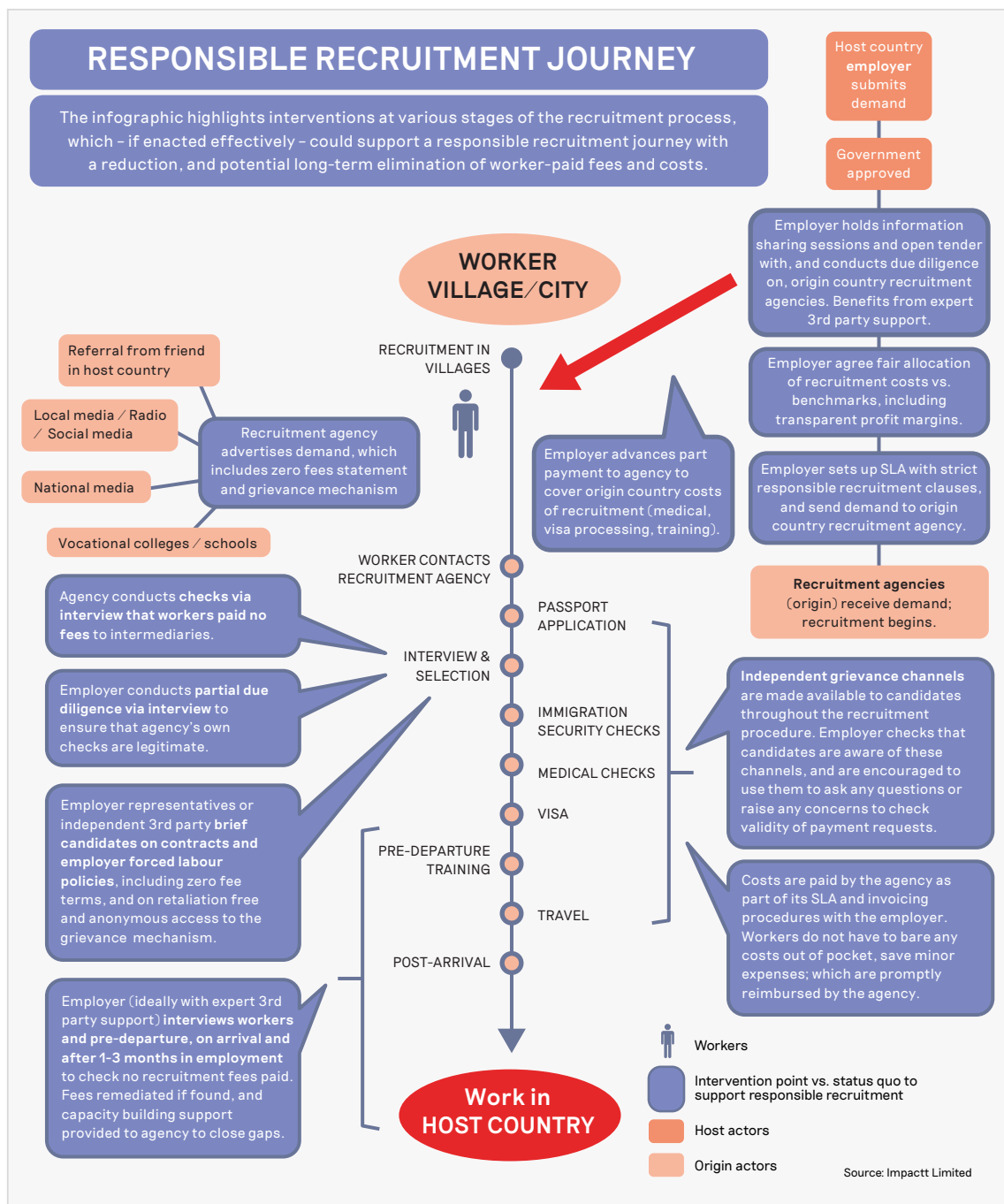


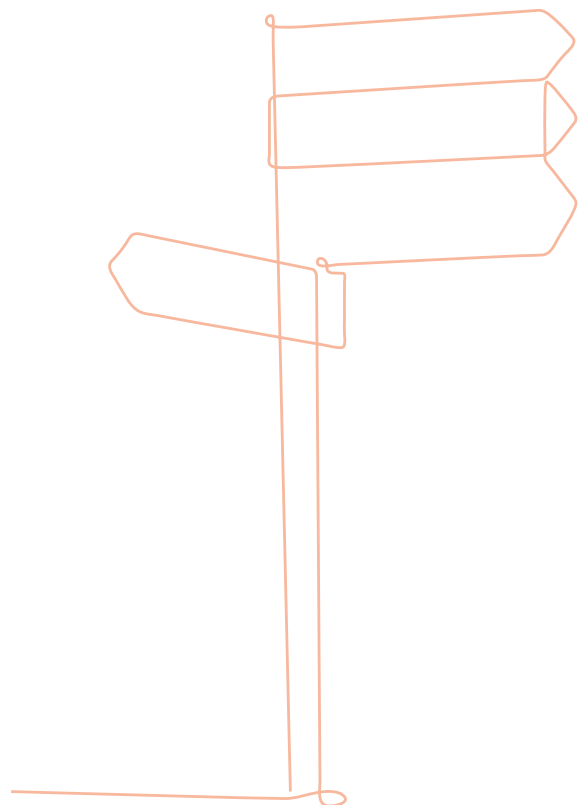
Figure 1: Infographic demonstrating the journey of responsible recruitment (Source: Impactt Limited)

## Areas for further research

Responsible recruitment may carry commercial risks, as buyers are often unwilling to absorb additional costs and may shift to cheaper suppliers. Further research is needed to assess the impacts of responsible recruitment in low-margin industries such as medical gloves, including effects on productivity, worker retention, and commercial performance. This would strengthen understanding of how responsible recruitment can be sustained and scaled.

Important knowledge gaps remain across supply chains and populations. Our 2025-26 survey covered only Nepali and Bangladeshi workers, limiting insight into other migrant groups that are also present in the medical gloves industry (including Indonesian, Myanmar, and Vietnamese workers), while Tier 2 suppliers remain largely outside oversight despite facing increased forced labour risks.

More research is needed to trace worker recruitment journeys across migration corridors – from origin communities to destination workplaces – and to understand how recruitment processes are negotiated between employers and recruitment agencies. This would help inform more targeted interventions.



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The Centre is a consortium of three Universities of Oxford, Liverpool and Hull, and is funded by the Arts and Humanities Research Council (AHRC) on behalf of UK Research and Innovation (UKRI).

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Published by: Modern Slavery and Human Rights Policy and Evidence Centre, University of Oxford

Publication date: 2026

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This work was supported by Modern Slavery and Human Rights Policy and Evidence Centre, University of Oxford [reference number: R90817/CN011] from its grant from the Arts and Humanities Research Council [grant number AH/T012412/2].

Identification number of the publication:  
PEC/2026/07

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