

Evaluation Methodology

A Methodology for Evaluating Japanese Recruitment Agencies (Supervising Organisation, and Registered Support Organisation) for Migrant Workers from a Human Rights Perspective

A. Feedback on the Seminar

Please describe in approximately 200 characters the specific lessons learned for your organisation from the seminar held on Friday, 7 November 2025, that you wish to implement or apply within your organisation. The recorded video of the seminar (x minutes) can be accessed [here](#).

(Maximum 200 characters)

Responses will be evaluated in two stages: No specific description (including blank responses) = 0, Specific description provided = 1

B. Company/organisation and the respondent

B-1. Please enter your company/organisation and respondent information. [Required]

Corporate Number	
Company/Organisation Name	
Your company/organisation's website	
Your company/organisation's telephone number	
Email address for our association to contact your company/organisation when necessary	
Name of respondent	
Department name and title of respondent	

※Corporate numbers can be searched for here (<https://www.houjin-bangou.nta.go.jp/>).

Not subject to evaluation

B-2. Please select the category under which your company/organisation is registered with the national government. (Multiple choice) [Required]

- Supervising Organisation
- Registered Support Organisation

Not subject to evaluation

C. Business scale

C-1. Does your company/organisation establish criteria for assigning technical intern trainees and/or specified skilled foreign workers to employers' workplaces? Examples include: "The distance from your company/organisation's permanent base to the factory where the technical intern trainees and/or specified skilled foreign workers are employed must be within XX km" or "The distance must allow for arrival within a maximum of XX hours in the event of an urgent incident." (Single choice)

[Required]

- Yes (Please describe the content of the criteria established by your organisation)
- No (If applicable, please state the reason)

Evaluate the response in two stages: Yes = 1, No = 0

C-2. Please select the nationalities of staff employed by your company/organisation who engage in the duties of supervising organisations or registered support agencies. Additionally, please select the nationalities of the technical intern trainees and/or specified skilled foreign workers managed and supported by your company/organisation. [Required]

	Nationality of staff	Nationality of Technical Intern Trainees and/or Specified Skilled Foreign Workers
Vietnam	<input type="checkbox"/>	<input type="checkbox"/>
Indonesia	<input type="checkbox"/>	<input type="checkbox"/>
Philippines	<input type="checkbox"/>	<input type="checkbox"/>
Myanmar	<input type="checkbox"/>	<input type="checkbox"/>
China	<input type="checkbox"/>	<input type="checkbox"/>
India	<input type="checkbox"/>	<input type="checkbox"/>
... (add countries as required)	<input type="checkbox"/>	<input type="checkbox"/>

The assessment shall evaluate the coverage rate of the nationalities of technical intern trainees and/or specific skilled foreign workers based on the nationality of staff (regardless of whether they are regular or non-regular employees). The assessment shall be conducted in the following three tiers: 0-50% = 0, 50% or more but less than 100% = 1, 100% = 2.

C-3. Please enter the number of technical intern trainees and/or specific skilled foreign workers managed and supported by your company/organisation. [Required]

	Please enter the number of persons
Technical Intern Trainees (including those undergoing transfer procedures for specific activities)	

Specified Skilled Foreign Workers (including those in specific activities preparing for transition to specified skilled status)	
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Evaluate the response using the following three-tier scale. The number of foreign workers per full-time (regular) employee is the basis for evaluation. 50 or more = 0, 39 or more but fewer than 50 = 1, fewer than 39 = 2

*In future, we will consider aligning with the requirements for training and employment by making the number of staff supervising trainees (excluding back-office staff) the basis for evaluation.

C-4. Do you set an upper limit / cap or guideline for the number of technical intern trainees or specific skilled foreign workers supported per staff member? Please select 'Yes' even if the limit or guideline is not publicly disclosed, provided it exists as an organisation-wide shared standard within the company, such as in internal regulations. (Single choice) [Required]

- Yes (Please state the number and the reason for setting the limit or guideline)
- No (If applicable, please state the reason)

Evaluate the response in two stages: Yes = 1, No = 0

C-5. Regarding the method and frequency of regular interviews with technical intern trainees and specified skilled foreign workers managed/supported by your company/organisation, please select one of the following: 'Do not comply with the law', 'Comply with the law', or 'Beyond the law'. If selecting any of these is difficult, please select 'Other' and describe the interview method and frequency. (Multiple choice possible)

For Technical Intern Trainee Category 1	Do not comply with the law <input type="checkbox"/>	Comply with the law <input type="checkbox"/>	Beyond the law <input type="checkbox"/>	Other <input type="checkbox"/>
For Technical Intern Trainee Category 2	Do not comply with the law <input type="checkbox"/>	Comply with the law <input type="checkbox"/>	Beyond the law <input type="checkbox"/>	Other <input type="checkbox"/>
For Specified Skilled Foreigners Category 1	Do not comply with the law <input type="checkbox"/>	Comply with the law <input type="checkbox"/>	Beyond the law <input type="checkbox"/>	Other <input type="checkbox"/>
For Specified Skilled Foreigners Category 2	Do not comply with the law <input type="checkbox"/>	Comply with the law <input type="checkbox"/>	Beyond the law <input type="checkbox"/>	Other <input type="checkbox"/>

(Maximum 1,000 characters)

Evaluate the response in three stages: Do not comply with the law = 0, Comply with the law = 1, Beyond the law = 2.

C-6. Does your company/organisation establish criteria for stationing staff at the employer's workplace? (Single choice) [Required]

- Yes
- No

Not subject to evaluation

C-6a. For those who answered 'Yes' above: Please describe the criteria and frequency for secondment.

Example: 5 days per week for 50 technical intern trainees (up to 20 hours per week for 25 trainees), etc.

(Maximum 1,000 characters)

Not subject to evaluation

D. In accordance with the UN Guiding Principles on Business and Human Rights, we ask about your initiatives concerning respect for human rights.

The [UN Guiding Principles on Business and Human Rights](#) (UNGPs) are an international standard established by the UN Human Rights Council in 2011, which clearly sets out the state's duty to protect human rights and the responsibility of businesses to respect human rights. In September 2022, the Ministry of Economy, Trade and Industry issued the "[Guidelines for Respecting Human Rights in Responsible Supply Chains, etc.](#)" based on these UNGPs. These guidelines require all business to respect human rights, implement human rights due diligence, and establish grievance mechanisms. In response, in October 2022, the Immigration Services Agency, the Ministry of Health, Labour and Welfare, and the Technical Intern Training Organisation issued the "[Respect for the Human Rights of Technical Intern Trainees in Responsible Supply Chains, etc. \(Notice\)](#)". This document states: "We request that all training providers and supervising organisations implement measures to respect the human rights of technical intern trainees based on these guidelines." The following questions cover points that companies and organisations promoting human rights respect and human rights due diligence initiatives are likely to consider, in line with the UN Guiding Principles on Business and Human Rights (UNGPs) introduced above, the METI guidelines, and the notice from the Immigration Services Agency, MHLW, and the Technical Intern Training Organisation (TITO).

D-1. Please tell us about your company/organisation's philosophy and approach regarding the management and support of technical intern trainees and specified skilled foreign workers. If you have published a human rights policy, please provide details of this as well.

(Maximum 1,000 characters)

The response will be evaluated in two stages: No response = 0, Response provided = 1, Not only formulating but also publishing its human rights policy as a specific measure = 2

D-2. Please describe any initiatives implemented with the aim of helping technical intern trainees and specific skilled foreign workers integrate more effectively into the local community where they reside.

Example: Organising and running events to encourage interaction between trainees and local university students of the same age group. When trainees first move in, arranging visits to greet the local police and neighbouring residents, and regularly reminding trainees to greet local residents.

(Maximum 1,000 characters)

Evaluate the response on the following three-point scale: No response (including blank spaces) = 0, Response present = 1, Specific measures evident = 2

D-3. Additionally, please provide specific details of any other initiatives you have undertaken that you believe contribute to respecting the human rights of technical intern trainees and specific skilled foreign workers, based on the following perspectives.

Please note that (1) where "also" is stated in the text, points are awarded only if all conditions are met. Where "or" is stated, points are awarded if any one condition is met. (2) Skilled Trainees and Specified Skilled Foreigners are hereinafter referred to as "the individual".

D-3-1. [At Recruitment] Our company/organisation implements measures to prevent individuals from making substantial payments to sending agencies or incurring debt as a result.

Example) We have adopted a zero-fee policy, clearly stipulated in our contracts with sending organisations, and only conduct business with sending organisations that agree to this policy. We explain during the recruitment interview that the individual is not required to pay any fees.

(Maximum 1,000 characters)

Response will be evaluated in the following two stages.

- No response addressing the question (including no response at all or blank spaces). = 0
- Some form of initiative exists. = 1 (see below to get a bonus point)

Bonus points will be awarded for measures that meet the following criteria (maximum 4 points / 1.3 point each):

- Our company/organisation confirms the contract between the sending organisation and the individual explicitly states that fee collection is within certain limits or that no fees are collected at all.
- Our company/organisation has directly confirmed with the individual whether recruitment fees were paid and, if so, the amount.
- Where recruitment fees were paid, the amount paid by the individual to date has been refunded to them by Our company/organisation.

D-3-2. [At Recruitment] Our company/organisation has implemented measures to ensure the individual has an accurate understanding of their actual duties, free from discrepancies, during the recruitment interview (prior to arrival in Japan).

(Maximum 1,000 characters)

Response will be evaluated in the following two stages.

- No response addressing the question (including no response at all or blank spaces). = 0
- Some form of initiative exists. = 1

Bonus points will be awarded for measures that meet the following criteria (maximum 4 points / 2 point each):

- Our company/organisation has directly explained the job duties to the individual.
- The company has directly explained the job duties to the individual.

D-3-3. [After receiving a job offer] Our company/organisation implements measures to ensure the individual can correctly understand their human rights and labour rights.

(Maximum 1,000 characters)

Response will be evaluated in the following two stages.

- In accordance with the law, our company/organisation provides post-entry legal protection training for technical intern trainees and conduct life orientation sessions for specific skilled foreign nationals. Furthermore, at the time of contract renewal, we explain the contents of the labour contract. = 0
- There are initiatives beyond what is required by law. = 1

Bonus points will be awarded for measures that meet the following criteria (maximum 4 points / 0.5 point each):

- Our company/organisation explains to individuals that, in accordance with international standards, workers should not be required to pay any fees whatsoever (Dhaka Principle 1).
- Our company/organisation explains to individuals that you must not be forced to agree to a

written labour contract (Dhaka Principle 2).

- Our company/organisation explains to individuals that in Japan, foreign workers are guaranteed the same freedom of association and right to collective bargaining as Japanese workers (Dhaka Principle 6).
- Our company/organisation explains to individuals that transfer of employment is possible under the Technical Intern Training Programme in unavoidable circumstances (Dhaka Principle 10).
- Our company/organisation explains to individuals on the content of the rights held by workers in their native language.
- Our company/organisation explains to individuals on the content of the rights held by workers not only verbally but also through the distribution of materials.
- Our company/organisation explains to individuals on the content of the rights held by workers annually on a regular basis even after assignment to a company (frequency not specified).
- Our company/organisation assesses individuals' level of understanding regarding the content of the human rights and labour rights described above (e.g., through questionnaires).

D-3-4. [Before and After Recruitment] Our company/organisation implements measures to alleviate the individual's concerns and enhance their motivation.

(Maximum 1,000 characters)

Response will be evaluated in two stages:

- No response addressing the question (including no response at all or blank spaces). = 0
- Some form of initiative exists. = 1

Bonus points will be awarded for the measures that meet the following criteria (maximum 4 points / 1 point each):

- Our company/organisation recommends companies meeting with the families of prospective employees or communicating online with prospective employees prior to their arrival.
- Our company/organisation recommends companies establish a foundation of understanding within the organisation regarding the acceptance of foreign nationals and provide cross-cultural understanding programmes for Japanese employees to facilitate communication with foreign nationals (e.g., conducting Vietnamese language courses for Japanese employees).
- Our company/organisation has established specific systems and mechanisms for foreign workers to motivate them by evaluating their abilities and rewarding their efforts (e.g., providing bonuses for passing the Japanese Language Proficiency Test, implementing pay rises based on ability and years of service). And our company/organisation encourages companies to establish such systems.
- Our company/organisation regularly verifying that the responses and measures taken by supervising organisations, registered support organisations, or companies meet the needs of foreign workers, such as by conducting satisfaction surveys.

D-3-5. [Post-Recruitment] Our company/organisation has established channel, systems and mechanisms enabling the individual to consult staff or third parties at any time, and has made these known to the individual (the term "tools/means, systems and mechanisms" here does not include the "regular interviews" stipulated in the operational guidelines).

(Maximum 1,000 characters)

Response will be evaluated in two stages.

- No response addressing the question (including no response at all or blank spaces) or the supervising organisation/registered support organisation has not prepared any tools/means for consultation. = 0
- Our company/organisation informed of a consultation point (complaints lodging point) where the individuals can raise issues in their native language, along with its contact details. = 1

Bonus points will be awarded for the following measures the measures that meet the following criteria (maximum 4 points / 1 point each):

- Our company/organisation has informed and encouraged the individual to use electronic channel (including Facebook, LINE, and other apps) which is available for raising concerns 24 hours a day, 365 days a year.
- Our company/organisation has established operational rules for the tool such as response deadlines for received complaints and record retention.
- Our company/organisation has established and communicated about a system enabling individuals to use the service with confidence (apply to all the following)
 - It is explicitly stated that individuals will not suffer any disadvantage for using the tool/means/channel.
 - Complaints can be made either named or anonymously.
 - A complaints handling service operated by an independent third party is utilised to ensure effective reception of complaints.
 - The process from receiving a complaint to responding is disclosed and published.
- Our company/organisation has received voices/complaints on a regular basis.

D-3-6. [Post-recruitment] Our company/organisation endeavours to respond effectively to concerns and complaints received from individuals.

(Maximum 1,000 characters)

Responses are evaluated in two stages:

- No response addressing the question (including no response at all or blank spaces), or in accordance with the law, the supervising organisation/registered support agency records all received feedback and the results of its handling and provides remedies to victims. = 0
- Some form of initiative beyond compliance exists. = 1

Bonus points are awarded for the measures that meet the following criteria (maximum 4 points / 1 point each):

- Our company/organisation shares the content of the received report within the organisation (not just with the individual handler), identifies the root cause, eliminates the cause, and implements corrective and remedial measures.
- Our company/organisation discloses the content and outcome of its handling of complaints received.
- Our company/organisation utilises the details of the case as lessons to prevent future complaints or harm.
- Where the root cause lies with the company, our company/organisation makes necessary recommendations to the company and establishes our own countermeasures and stance towards the company should no improvement be observed.

D-3-7. Please provide specific details of any other initiatives undertaken by your company/organisation aimed at enhancing understanding of respect for human rights within your organisation.

(Maximum 1,000 characters)

Response content will be evaluated in the following two stages.

- No response addressing the question (including no response at all or blank spaces). = 0
- Some form of initiative exists. = 1

Bonus points will be added for the measures that meet the following criteria (maximum 4 points / 1 point each):

- Our company/organisation provides opportunities for our employees to deepen their understanding of respecting the human rights of technical intern trainees and specified skilled foreign workers (e.g., conducting in-house study sessions with support from NGOs or external lecturers, arranging opportunities to learn about the laws of sending countries).
- Our company/organisation provides opportunities for our employees for dialogue with people in the local community where the individual lives.
- Our company/organisation respond to enquiries from individuals belonging to other supervising organisations/registered support organisations.
- Our company/organisation participate external platforms where one can learn about respecting the human rights of technical intern trainees and specified skilled foreign workers (e.g., JP-MIRAI).

D-4. Is your company/organisation aware of the UN Guiding Principles on Business and Human Rights mentioned above? (Single choice) [Required]

- Yes
- No

Evaluate the selection in the following two stages: Yes = 1, No = 0

D-5. Is your company/organisation aware of the "Dhaka Principles" which outline the rights of migrant workers (foreign national workers)? (Single choice) [Required]

The Dhaka Principles are a set of principles published in 2011. They were developed primarily by the UK-based think and do tank, the Institute for Human Rights and Business (IHRB), following consultations with private companies, governments, trade unions, and civil society organisations. "The Dhaka Principles for Migration with Dignity" are widely recognised as international principles for respecting the human rights of migrant workers.

- Yes
- No

Evaluate the selection in the following two stages. Yes = 1, No = 0

E. Other

Please feel free to add any comments regarding this questionnaire.

(Maximum 1,000 characters)

Not subject to evaluation

End

The maximum scores for each question and each section are as follows.

	Maximum score	Maximum score per section	
A	1	1	
B-1	Not subject to evaluation	Not subject to evaluation	
B-2	Not subject to evaluation		
C-1	1	8	
C-2	2		
C-3	2		
C-4	1		
C-5	2		
C-6, 6a	Not subject to evaluation		
D-1	2		41
D-2	2		
D-3-1	5		
D-3-2	5		
D-3-3	5		
D-3-4	5		
D-3-5	5		
D-3-6	5		
D-3-7	5		
D-4	1		
D-5	1		
E	Not subject to evaluation	Not subject to evaluation	
Total	50		