

M&S

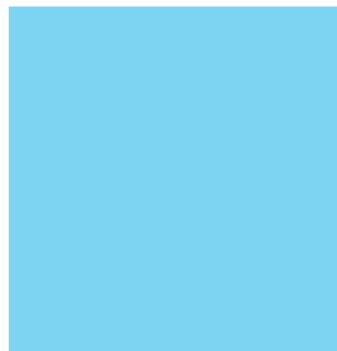
EST. 1884

MODERN SLAVERY TOOLKIT

FOR SUPPLIERS AND PARTNERS



“ EMBEDDING
RESPECT FOR
HUMAN RIGHTS
IS THE NEXT
STAGE IN OUR
DEVELOPMENT.



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“ SUSTAINABLE BUSINESS CAN ONLY SUCCEED IN SOCIETIES IN WHICH HUMAN RIGHTS ARE RESPECTED.



THE PURPOSE OF THIS TOOLKIT

This toolkit is intended to support M&S suppliers and partners to implement a strategy for their business and their supply chains to tackle modern slavery, as well as make clear M&S' expectations. Increasing legal requirements and expectations from consumers, customers, employees and stakeholders mean that responsible businesses need to place tackling modern slavery at the heart of their corporate social responsibility activities. Implementing the steps outlined in the toolkit:

- Demonstrates a commitment to tackle modern slavery
- Determines proactive measures that can be taken in a business's own operations and their supply chains to reduce the risk of modern slavery and manage incidences where they occur
- Supports engagement with employees, employee representatives and suppliers and partners to protect workers and prevent exploitation.

THERE ARE MANY MATERIALS IN THE PUBLIC DOMAIN WHICH OFFER DETAIL ON MANAGING MODERN SLAVERY RISK. THIS TOOLKIT THEREFORE PROVIDES A CONCISE OVERVIEW OF THE TOPIC, AND SIGNPOSTS A NUMBER OF ADDITIONAL MATERIALS WHICH IT IS RECOMMENDED YOU REVIEW.

KEY FURTHER READING

Home Office – Transparency in Supply Chains: A Practical Guide

<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

Stronger Together Initiative

<http://stronger2gether.org/>

Sedex guidance on Operational Practice and Indications of Forced Labour

<http://www.sedexglobal.com/wp-content/uploads/2011/06/Sedex-Guidance-on-Operational-Practice-and-Indicators-of-Forced-Labour.pdf>

M&S' EXPECTATIONS OF SUPPLIERS AND PARTNERS

- Be familiar with M&S' Global Sourcing Principles (<https://corporate.marksandspencer.com/documents/plan-a-our-approach/global-sourcing-principles.pdf>) and work to meet them
- Digest this toolkit and take steps to implement the action points set out - this may be proportionate to your business size and risk profile
- Be compliant with the 'Transparency in Supply Chains' public reporting requirement set out in the UK Modern Slavery Act (2015), if your business is in scope for this
- Continue to engage with M&S as we work with suppliers and partners to implement best practice on Modern Slavery and Human Rights.

Subsequent correspondence from M&S will ask for an update on your businesses implementation progress against these practical steps.

WHAT IS MODERN SLAVERY?

Modern slavery is a broad term used to encompass slavery, servitude and forced or compulsory labour and human trafficking. It includes slavery-like practices such as debt bondage, sale or exploitation of children and forced or servile marriage. The theme underlying all these offences is one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

SLAVERY IN SUPPLY CHAINS CAN TAKE THE FORM OF:

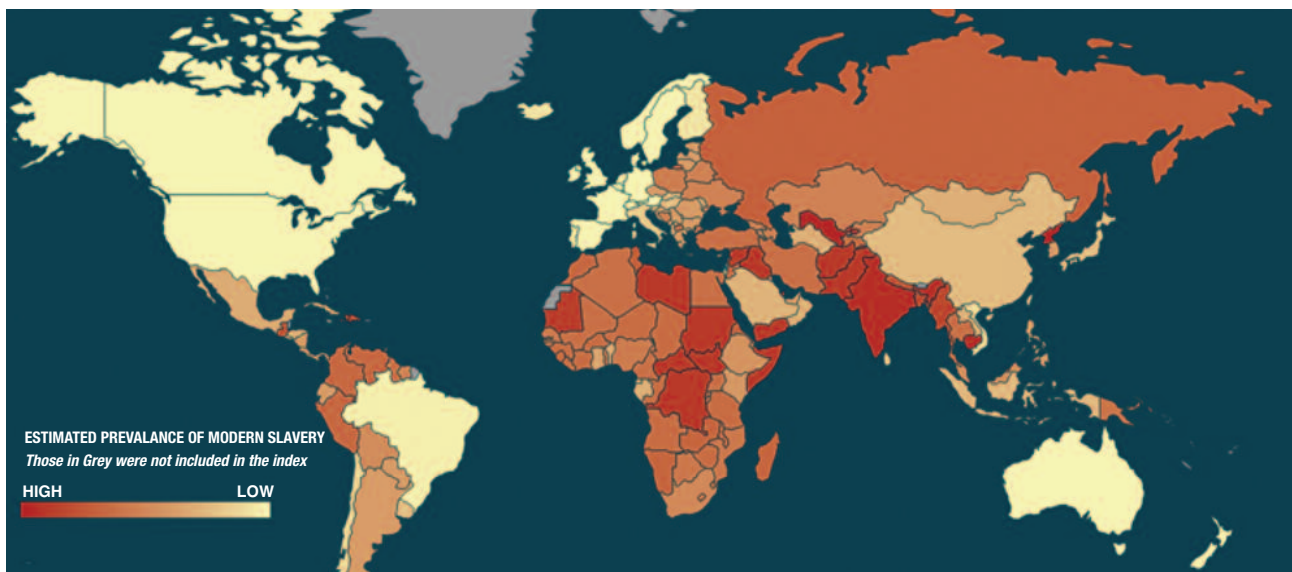
- State-sponsored or controlled slavery e.g. forced prison labour or the annual mobilisation of child labour
- Employer controlled – where an employer knowingly holds workers in a forced labour situation either by: applying conditions such as the retention of wages or excessive hours that create forced labour; by outsourcing work to illegal sub-contractors or; engaging workers through a labour supplier at an exploitative price
- Recruitment intermediary controlled – where a private employment agency, informal agent or labour broker exploits workers. The end-user employer may or may not be complicit in the exploitation
- Gang controlled – where criminal gangs exploit individuals and force them to work for legitimate employers and labour providers or rogue supervisors, consultants and workers control workers.

THE SCALE OF MODERN SLAVERY

Accurate estimates of modern slavery figures are difficult to ascertain because slavery is a hidden and largely illegal activity. The 2016 Global Slavery Index estimates that there are 45 million people in modern slavery globally¹.

The ILO estimates that there are 20.9 million persons in forced labour globally² which includes 14.2 million in private economy sectors such as construction, manufacturing, mining, utilities, agriculture, forestry, fishing and domestic work. Slavery is, ultimately, an economic activity which generates significant revenues for those responsible for exploitation and trafficking. Slavery and human trafficking are estimated to be one of the fastest growing criminal industries in the world today³.

ESTIMATES OF SLAVERY GLOBALLY⁴



MODERN SLAVERY IS NOT JUST A RISK FOR BUSINESSES AND THEIR WORKFORCE. IT NEEDS TO BE CONSIDERED ALL ALONG A BUSINESS'S SUPPLY CHAIN INCLUDING LABOUR AGENCIES AND RECRUITERS TO THAT SUPPLY CHAIN, SUB-CONTRACTORS, DISTRIBUTION, EQUIPMENT AND SERVICES.

VICTIMS OF SLAVERY

Exploitation risks are increased whenever or wherever people are vulnerable. Evidence shows that it is mainly migrant workers who are the victims of forced labour, labour trafficking and the more extreme forms of labour exploitation. Migrants are often susceptible because they need work to survive, their options are limited by language skills, they trust fellow countrymen who make false promises or they expect to pay for work if it is common practice in their own country.

Exploiters and gangs are practised in how to subdue, break, control and maximise economic return from the individuals they have enslaved. They may use a number of methods including financial indebtedness, psychological and physical violence, threats of violence, isolation and withholding victim's identification documents. Victims may be unwilling or unable to make formal complaints due to fear of retribution, the psychological damage done by their abusers, lack of knowledge of their rights or how to enforce them, fear of retribution and self-blame and shame about the situation they are in.

THE SIGNS OF EXPLOITATION IN VICTIMS VARY FROM SITUATION TO SITUATION HOWEVER THE FOLLOWING ARE INDICATORS THAT ARE OFTEN FOUND IN CASES OF EXPLOITATION:

- **Physical appearance** – victims may show signs including malnourishment, being dirty, frightened, withdrawn and confused or having injuries because of assault
- **Few or no personal effects** – no money, no personal items, few or unsuitable clothing or little or no food
- **Isolation and control** – workers who are rarely left on their own and appear to be under the influence of others who present their documents and speak for them, book them onto shifts, speak on their behalf or take them to and from work
- **Reluctant to seek help** – workers who avoid eye contact and appear frightened and are afraid to talk and reject help when offered.

EXPERIENCE SHOWS THAT WORKERS EMPLOYED AS TEMPORARY WORKERS VIA RECRUITMENT AGENCIES/LABOUR PROVIDERS/GANGMASTERS ARE PARTICULARLY AT RISK OF BEING VICTIMS OF MODERN SLAVERY.



¹<http://www.globallslaveryindex.org/>

²http://www.ilo.org/global/topics/forced-labour/news/WCMS_182109/lang--en/index.htm

³http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_243201/lang--en/index.htm

⁴<http://www.globallslaveryindex.org/>

WHY RESPONSIBLE BUSINESSES **MUST** TACKLE MODERN SLAVERY

BUSINESSES NEED TO TAKE RESPONSIBILITY FOR TACKLING MODERN SLAVERY TO ENSURE:

- Legal compliance – legislation has been developed in the UK and in California requiring companies to report on the steps they are taking to undertake due diligence and manage the risks of slavery in their supply chains. In 2015, the UK launched the Modern Slavery Act 2015; Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 and Human Trafficking and Exploitation (Scotland) Bill. The Bill requires, under the “Transparency in supply chains etc” provision, that all businesses with a turnover of £36 million or more providing goods and services in the UK must disclose in an annual slavery and human trafficking statement what steps they have taken during the financial year to ensure their business and supply chains are slavery free. The statement must be approved by the company’s board of directors, signed by a director and published on the organisation’s website with a link on the home page as soon as reasonably practicable after the end of each financial year. The UK Government has issued a practical guide⁵ to meeting, in spirit and intention, the requirements of the “Transparency in Supply Chains etc”.
- Protecting your brand and meeting customer requirements - customers frequently state operating ethically is a key determining factor for their purchasing decisions. Businesses – particularly those that supply consumer markets and have significant brand value – face new and growing expectations that production will comply with social and human rights criteria.
- Management of trade and investment risk – in some countries, trade regulations prohibit the import of goods produced by forced or trafficked labour. In these jurisdictions, such allegations can result in confiscation of imported goods by public authorities or disruption to trade and production schedules. Allegations of forced labour and trafficking can also significantly threaten investor relations and jeopardise access to public funds such as export credits.

ETHICAL HIRING AND RECRUITMENT

Experience shows that the recruitment stage is often where workers are most at risk from modern slavery exploitation, especially where third party labour recruiters are involved, and especially where the workers are migrant. It is therefore essential that you pay particular attention to this element of your management systems.

GOOD PRACTICE INCLUDES:

- Only working with formal labour providers who are legitimate, registered business entities
- Having clear Service Level Agreements in place with your labour provider
- Conducting checks on the labour providers’ management systems, including agency worker documents (eg right to work documents, payslips, contracts)
- Having regular conversations with agency workers to understand if they have been treated correctly

FIND OUT MORE: PLEASE READ THE FULL CHECKLISTS IN APPENDIX 2 AND 3 TO UNDERSTAND ALL STEPS YOU SHOULD TAKE WITH YOUR LABOUR PROVIDER.

Verite’s **Help Wanted Fair Hiring toolkit** is recommended reading on ethical recruitment
<http://helpwanted.verite.org/helpwanted>

⁵See Transparency in Supply Chains etc - A practical guide - Guidance issued under section 54(9) of the Modern Slavery Act 2015
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc__A_practical_guide__final_.pdf

PRACTICAL STEPS TO TACKLE MODERN SLAVERY IN YOUR ORGANISATION

BUSINESSES WHO WANT TO PUT IN PLACE GOOD PRACTICE OPERATIONAL AND MANAGEMENT PROCESSES TO DETER HIDDEN LABOUR EXPLOITATION AND/OR TO IDENTIFY ISSUES IN THEIR OWN ORGANISATION SHOULD UNDERTAKE THE STEPS OUTLINED IN THE TABLE BELOW.

THE APPENDIX CONTAINS A FULL CHECKLIST OF ACTIONS TO TAKE AT EACH STEP.

TAKE STEPS	TAKE ACTION
<p>MAKE A COMMITMENT ON MODERN SLAVERY</p>	<p>Assign board level responsibility</p> <p>Discuss what the company wants to achieve in preventing modern slavery</p>
<p>ESTABLISH GOOD MANAGEMENT SYSTEMS</p>	<p>Establish due diligence checks in the appointment of labour providers</p> <p>Only contract formal labour providers with an identifiable legitimate business entity</p>
<p>TRAIN STAFF AND SUPPLIERS</p>	<p>Train relevant staff in how to implement your policies and identify forced labour</p> <p>Train staff visiting suppliers to spot the signs that may indicate worker exploitation</p>
<p>ESTABLISH GOOD LABOUR SOURCING PRACTICES IN YOUR COMPANY AND SUPPLY CHAINS</p>	<p>Develop a written policy that states the cost of recruitment is a business cost and that no cost of recruitment will be charged for workers</p>
<p>ESTABLISH GOOD RECRUITMENT PRACTICES</p>	<p>Train recruiters in the organisation's processes to recognise, prevent and report forced labour, labour trafficking and other hidden third party labour exploitation</p>
<p>PUT IN PLACE GOOD RECORDS AND CHECKS FOR WORKERS</p>	<p>Establish checks of workers' addresses for high occupancy of particular houses</p> <p>Check bank accounts to identify unrelated workers paid into one account</p>
<p>DEVELOP GOOD WORKPLACE MONITORING PRACTICES</p>	<p>Supervisors are trained to monitor, record and report where workers' appearance may show signs of injury or malnourishment</p>
<p>CREATE GOOD WORKPLACE ENGAGEMENT GOOD PRACTICE</p>	<p>Encourage supervisors and managers to talk informally to workers to understand whether any are experiencing issues</p>
<p>PROVIDE ACCESS TO REMEDY</p>	<p>Demonstrate that grievance procedures are in place, issued to all workers and operated fairly and independently</p>

PRACTICAL STEPS TO TAKE TO TACKLE MODERN SLAVERY IN YOUR SUPPLY CHAIN

BUSINESSES WHO WANT TO MANAGE THE RISK OF MODERN SLAVERY ALONG THEIR SUPPLY CHAINS SHOULD CONSIDER THE FOLLOWING STEPS. FOR A FULL SET OF ACTIONS TO TAKE AT EACH STEP, PLEASE SEE THE CHECKLIST IN THE APPENDIX.

THE APPENDIX CONTAINS A FULL CHECKLIST OF ACTIONS TO TAKE AT EACH STEP.

TAKE STEPS	TAKE ACTION
MAKE A COMMITMENT ON MODERN SLAVERY	<p>Assign board level responsibility</p> <p>Discuss what the company wants to achieve in preventing modern slavery</p>
ESTABLISH POLICIES & PROCESSES FOR SUPPLIERS TO REDUCE THE RISK OF MODERN SLAVERY	<p>Develop a written policy that states the cost of recruitment is a business cost and that no cost of recruitment will be charged for workers</p>
ESTABLISH GOOD MANAGEMENT SYSTEMS FOR YOUR SUPPLY CHAIN	<p>Establish due diligence checks in the appointment of suppliers to establish their credibility, legitimacy and ability to manage labour rights</p>
ASSESS WHERE YOUR COMPANY'S GREATEST RISKS OF SLAVERY OCCUR	<p>Draw up an initial high level assessment of your supply chain, including direct and indirect suppliers, labour providers and contractors to identify low, medium and high risk suppliers</p>
ACT - TACKLE THE RISKS THAT YOU HAVE IDENTIFIED	<p>Based on your available resources, take immediate steps to reduce the risk of high risk suppliers</p> <p>Develop channels for gathering and managing future risk information</p>
PROVIDE ACCESS TO REMEDY	<p>Require suppliers to establish grievance procedures</p> <p>Require suppliers to establish a whistleblowing procedure</p>

WRITING A MODERN SLAVERY STATEMENT

Every organisation carrying on a business in the UK with a total annual turnover of £36m or more will be required to produce a slavery and human trafficking statement for each financial year of the organisation. It is essential that your business understands whether they are in scope for reporting: you should refer to the Home Office document listed in Appendix 1 if you are unsure whether you are in scope.

A STATEMENT SHOULD INCLUDE INFORMATION ABOUT:

- A. THE ORGANISATION'S STRUCTURE, ITS BUSINESS AND ITS SUPPLY CHAINS
- B. ITS POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING
- C. ITS DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING IN ITS BUSINESS AND SUPPLY CHAINS
- D. THE PARTS OF ITS BUSINESS AND SUPPLY CHAINS WHERE THERE IS A RISK OF SLAVERY AND HUMAN TRAFFICKING TAKING PLACE, AND THE STEPS IT HAS TAKEN TO ASSESS AND MANAGE THAT RISK
- E. ITS EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN ITS BUSINESS OR SUPPLY CHAINS, MEASURED AGAINST SUCH PERFORMANCE INDICATORS AS IT CONSIDERS APPROPRIATE
- F. THE TRAINING AND CAPACITY BUILDING ABOUT SLAVERY AND HUMAN TRAFFICKING AVAILABLE TO ITS STAFF.

APPENDIX 1 LISTS A NUMBER OF SOURCES OF ADDITIONAL READING TO PREPARE FOR WRITING YOUR MODERN SLAVERY STATEMENT.



APPENDIX 1:

KEY RESOURCES TO VIEW

(*DENOTES ESSENTIAL RESOURCES)

*Home Office Guidance on Transparency in Supply Chains and Writing a Modern Slavery statement - <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

*Stronger Together toolkits for tackling modern slavery in UK businesses and global supply chains – all accessible on www.stronger2gether.org

- Tackling Modern Slavery in Businesses Toolkit (2013)
- Tackling Modern Slavery in Global Supply Chains (2016)
- Effective Communication with a Multi-Language Workforce (2013)

WRITING A MODERN SLAVERY STATEMENT

- Home Office guidance (see above)
- Business and Human Rights Resource Centre Modern Slavery Act registry (registry for company statements) <https://business-humanrights.org/en/uk-modern-slavery-act-registry>
- CORE Effective Reporting Under the Modern Slavery Act: A civil society guide for commercial organisations on the transparency in supply chains clause http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf
- Ergon report on company reporting under the Modern Slavery Act <http://www.ergonassociates.net/component/content/article/41-selected-reports/287-what-are-companies-reporting-on-modern-slavery>

SOURCES OF COUNTRY AND INDUSTRY INFORMATION REGARDING THE RISK OF MODERN SLAVERY

- Danish Institute for Human Rights – Country Risk and Business Country Guide <http://hrbcountryguide.org/>
- Freedom in the World Report, Freedom House https://freedomhouse.org/report/freedom-world/freedom-world-2015#.VsyF_vmLTIU
- International Trade Union Conference (ITUC) – WTO Reviews <http://www.ituc-csi.org/documents>
- Transparency International Corruption Perception Index <http://www.transparency.org/research/cpi/overview>
- UNICEF & Global Child Forum – Children’s Rights and Business Atlas <http://www.childrensrighsatlas.org/>
- US Dept. of State Country Reports on Human Rights Practices <http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/#wrapper>
- US Department of Labour’s List of Goods Produced by Child Labour and Forced Labour <http://www.dol.gov/ilab/reports/child-labor/list-of-goods/>
- US State Department Trafficking in Person’s report (TIP) <http://www.state.gov/j/tip/rls/tiprpt/>
- Verité Forced Labour Commodity Atlas <http://www.verite.org/Commodities>
- *Walk Free Foundation’s Global Slavery Index <http://www.globalsslaveryindex.org/>

GUIDANCE FOR IDENTIFYING AND ADDRESSING CASES OF FORCED LABOUR

- *Guidance on Operational Practice and Indicators of Forced Labour (SEDEX 2016)

APPENDIX 1: CONTD.

ETHICAL RECRUITMENT AND HIRING

- *Verite Help Wanted Fair Hiring toolkit <http://helpwanted.verite.org/helpwanted>

TOOLS FOR MONITORING AND SOCIAL AUDITS

- Ethical Trade Norway (IEH) - Self-Assessment Questionnaire www.ieh.no/Guide
- Ethical Trade Norway (IEH) - Risk Assessment and Identification Database (RAND) www.ieh.no/Guide
- SEDEX www.sedexglobal.com/ethical-audits/smeta
- Standards Map – a free online tool to help identify industry specific standards, codes and other protocols and guidelines relevant to specific industries www.standardsmap.org

INFORMATION SOURCES ABOUT POTENTIAL REMEDIATION FOR CASES OF FORCED LABOUR

- Tool 10, Making a Plan for Remediation, Walk Free Foundation, Tackling Modern Slavery in Supply Chains A Guide 1.0 (2014) <http://business.walkfreefoundation.org/>

GUIDANCE ON REPORTING PERFORMANCE

- Ethical Trade Norway – (IEH) reporting template www.ieh.no/Guide
- Global Reporting Initiative (GRI) www.globalreporting.org
- UN Guiding Principles Reporting Framework <http://www.ungpreporting.org/consult-the-reporting-framework/download-the-reporting-framework/>



FACT



FACT

APPENDIX 2:

CHECKLIST OF PRACTICAL STEPS TO TAKE, TO TACKLE MODERN SLAVERY IN YOUR BUSINESS

STEP 1: MAKE A COMMITMENT TO MODERN SLAVERY	TICK IF DONE
1. Assign responsibility for addressing modern slavery and human trafficking to a Board level or equivalent director and senior managers.	
2. Form a working group to tackle modern slavery which includes staff from different functions. If a working group is not possible, assign operational responsibility for modern slavery to an individual with the right skills, interests and influence.	
3. Develop a map of the company's key internal and external stakeholders to understand who the company impacts through its operations and supply chain and who can support it in its modern slavery goals.	
4. Discuss what the company wants to achieve in preventing modern slavery e.g. do you want to be a leader in your industry or meet basic legal and industry standards?	
5. Develop an initial implementation plan for how to achieve the company's goals, allocating roles, responsibilities and resources, clarifying tasks and setting clear objectives.	
6. Engage internally, communicating the company's goals for tackling modern slavery.	
7. Review existing company policies to ensure that modern slavery is referenced and that staff and suppliers and partners are clear that the exploitation of workers is not tolerated. This should include an Ethical Trading Policy or Code of Conduct, Procurement policies, supplier contracts and service level agreements, anti-bribery and corruption policies, labour provider contracts and service level agreements.	
8. Review existing company procedures to ensure that modern slavery is referenced and staff and suppliers and partners understand what steps they are responsible for. This should include: staff handbooks, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements.	
9. Communicate changes in policies and procedures to staff and suppliers and partners, translating them into necessary languages as required.	
10. Train human resources, compliance officers, auditors and other relevant staff in how to implement your policies and identify forced labour in practice (See Appendix 1 for guidance on identifying forced labour - SEDEX Guidance on Operational Practice and Indicators of Forced Labour).	
11. Train suppliers and partners and labour providers on how to implement the company's policies.	
12. Where the employer has formal workforce representation arrangements, consult with and work collaboratively with trade unions and/or employee representatives.	
STEP 2: ESTABLISH GOOD MANAGEMENT SYSTEMS FOR YOUR COMPANY'S OPERATIONS	TICK IF DONE
13. Establish due diligence checks in the appointment of labour providers to establish their credibility and legitimacy. Only contract with formal labour providers with an identifiable and distinct legitimate business entity. Ensure labour providers meet legal requirements for the country in which they are operating.	

14. Create formal written processes for supervisors and workers to report and record suspected cases of labour trafficking, forced labour and hidden labour exploitation.	TICK IF DONE
15. Generate a system for highlighting issues relating to modern slavery in third party ethical audits in the company's operations and ensuring they are formally investigated and resolved.	
16. Demonstrate that regular audits are conducted to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout the business.	
STEP 3: TRAIN STAFF AND SUPPLIERS AND PARTNERS	TICK IF DONE
17. Train senior management, human resources, compliance officers, supervisors, auditors and other relevant staff in how to implement your policies and identify forced labour in practice (See Appendix 1 for guidance on identifying forced labour - SEDEX Guidance on Operational Practice and Indicators of Forced Labour).	
18. Train security staff to spot the signs that may indicate worker exploitation and to report concerns to appropriate managers.	
19. Train all staff visiting suppliers, partners and service providers to spot the signs that may indicate worker exploitation and to report concerns to appropriate managers.	
20. Train suppliers, partners and labour providers on how to implement the company's policies.	
STEP 4: ESTABLISH GOOD LABOUR SOURCING PRACTICES IN THE COMPANY'S OPERATIONS AND SUPPLY CHAINS	TICK IF DONE
21.. Develop a written policy that states the cost of recruitment is a business cost and that no fee or cost of recruitment will be charged for workers, directly or indirectly in whole or in part.	
22. Establish systems for monitoring labour providers and labour sourcing agents to ensure no fees are charged to workers, directly or indirectly through the required purchase of goods or services.	
23. Create processes to prevent individuals introducing significant numbers of workers for work.	
24. Discuss and agree the recruitment selection criteria and a fair and non-discriminatory process used by labour providers.	
STEP 5: ESTABLISH GOOD RECRUITMENT PRACTICES	TICK IF DONE
25. Establish processes for recruiting staff which include recording: how the worker found out about the work, whether the worker has paid anyone or will have to pay anyone to obtain the work, whether the worker has paid anyone to get into the country, the worker's landlord's name and the worker's address.	
26. Train recruiters in the organisation's processes to recognise, prevent and report forced labour, labour trafficking and other hidden third party labour exploitation.	
27. Ensure staff responsible for recruiting staff for the company's own operations and labour providers staff are trained and instructed to report and record where workseekers are introduced by an individual who may claim to be a relative or friend but exerts control over the workers e.g. speaking for them and waiting while they are interviewed.	

STEP 6: PUT IN PLACE GOOD RECORDS AND CHECKS OF WORKERS		TICK IF DONE
28.	Establish regular checks of workers' and workseekers' addresses for high occupancy of particular houses and act accordingly on the information.	
29.	Systematically check bank accounts to identify unrelated workers paid into one account; mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers; documents for the same next of kin and/or same place of origin/location in home country; emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number. Act accordingly on the information for all these checks.	
STEP 7: DEVELOP GOOD WORKPLACE MONITORING PRACTICES		TICK IF DONE
30.	Employer directs CCTV cameras and Security Officers to areas where workers disembark from transport to work to monitor any potential suspicious activity.	
31.	The employer's supervisors and/or security officers are trained and instructed to monitor, record and report where workers are delivered and collected from work where such transport and the drivers raise cause for suspicion, such as the type of vehicle, the demeanor of the drivers and passengers.	
32.	The employer's supervisors are trained and instructed to monitor, record and report where agency and direct workers appear frightened, agitated or secretive; act as if they are instructed by another and/or look to another to speak on their behalf; reject help and support when offered.	
33.	The employer's supervisors are trained and instructed to monitor, record and report where agency and direct workers' physical appearance may show signs of injury and malnourishment; their general appearance may be unkempt with inappropriate clothing; they may have few or no personal effects; little or no money for food.	
34.	The labour provider can demonstrate that its recruiters and consultants are trained and instructed to monitor, record and report where a group of workers (who may, live work and/or travel together) stop working suddenly for no particular reason.	
35.	Employer appoints trusted "Worker Welfare Officers" or "Integration Officers" who speak representative languages to gain the trust of fellow workers and come forward with information of workers experiencing difficulties.	
STEP 8: CREATE GOOD WORKPLACE ENGAGEMENT		TICK IF DONE
36.	Issues workers with materials on how to recognise and report hidden exploitation in relevant languages.	
37.	Encourage supervisors and managers to regularly talk informally to workers to understand whether any are experiencing issues such as harassment, coercion, bullying, control or exploitation.	
38.	Issue occasional confidential questionnaires to a sample of workers through a variety of means (email/ post/ group-completion) to understand if any workers are experiencing issues such as harassment, coercion, bullying, control or exploitation.	
39.	Use independent NGOs, migrant workers support groups or other worker welfare organisations to speak to workers in native language and understand any issues.	
40.	Support formal worker representatives to engage with workers or where they do not exist speak to groups of workers to determine if there are any issues with harassment, coercion, bullying, control or exploitation and to discuss whether there are any ways the labour provider can improve its processes or better engage with workers.	

<p>41. Employer and trade union and/or employee representatives have hidden labour exploitation as an agenda item during progress meetings and review collaborative informal and formal approaches to identifying, deterring and tackling this issue.</p>	<p>TICK IF DONE</p>
<p>STEP 9: PROVIDE ACCESS TO REMEDY</p>	
<p>42. Demonstrate that complaints/ grievance procedures are in place, issued to all workers and operated fairly and independently.</p>	<p>TICK IF DONE</p>
<p>43. Verify that labour providers have a complaints/ grievance procedure, issued to all workers and operated fairly and independently.</p>	<p>TICK IF DONE</p>
<p>44. Put in place a multi-language confidential helpline process through which issues can be raised confidentially by phone, email or in writing to either: the labour user workforce helpline; an independent specialist helpline service; a Senior Manager/HR who is separate to the direct supervision of the worker.</p>	<p>TICK IF DONE</p>
<p>45. Demonstrate that a whistleblowing procedure is in place whereby supervisors and managers can confidentially raise issues of concern to a member of the senior team without fear of retribution.</p>	<p>TICK IF DONE</p>

APPENDIX 3:

CHECKLIST OF PRACTICAL STEPS TO TAKE TO TACKLE MODERN SLAVERY IN YOUR SUPPLY CHAIN

<p>STEP 1: MAKE A COMMITMENT TO MODERN SLAVERY</p>		<p>TICK IF DONE</p>
<p>See steps detailed previously in Section 6.</p>		<p>TICK IF DONE</p>
<p>STEP 2: ESTABLISH POLICIES AND PROCESSES FOR SUPPLIERS AND PARTNERS IN YOUR SUPPLY CHAIN TO REDUCE THE RISK OF MODERN SLAVERY</p>		<p>TICK IF DONE</p>
<p>46. Develop a written policy for suppliers and partners that states the cost of recruitment is a business cost and that no fee or cost of recruitment must be charged for workers by your suppliers and partners and their suppliers and partners, directly or indirectly in whole or in part.</p>	<p>TICK IF DONE</p>	
<p>47. Establish systems for monitoring suppliers and partners to ensure no fees are charged to workers, directly or indirectly during recruitment of employment.</p>	<p>TICK IF DONE</p>	
<p>48. Develop a written policy for suppliers and partners which outlines the need for regular checks of documentation to identify: workers' and workseekers' addresses for high occupancy of particular houses; bank accounts which identify unrelated workers being paid into one account; mobile phone numbers linking seemingly unrelated workers; same next of kin and/or same place of origin/location in home country and; same emergency contact numbers.</p>	<p>TICK IF DONE</p>	
<p>49. Include in the policy a requirement for suppliers and partners to establish processes for monitoring workers transport to identify any potential suspicious activity, including the training of supervisors to monitor, record and report any issues.</p>	<p>TICK IF DONE</p>	

50. Include in the policy the training of supervisors at suppliers and partners' sites in monitoring, recording and reporting cases of workers appearing frightened, agitated or secretive; acting as if they are instructed by another and/or looking to another to speak on their behalf; rejecting help and support when offered, showing signs of injury or neglect, having inappropriate clothing, few or no personal effects and little or no money for food.	TICK IF DONE
51. Include in the policy a requirement for suppliers and partners to act upon the information they have identified through the above checks and to communicate where incidences of modern slavery are found.	
52. Require suppliers and partners to provide information for workers on how to recognise and report hidden exploitation in relevant languages and for supervisors and managers to talk informally to workers on a regular basis to understand whether any are experiencing issues such as harassment, coercion, bullying, control or exploitation.	
53. Require suppliers and partners to support formal worker representatives, if they are in place, to engage with workers and determine if there are any issues with harassment, coercion, bullying, control or exploitation.	
54. Require suppliers and partners to establish confidential means of understanding if workers are experiencing issues such as harassment, coercion, bullying, control or exploitation including questionnaires or links to independent NGOs, migrant worker support groups or other welfare organisations.	
STEP 3: ESTABLISH GOOD MANAGEMENT SYSTEMS FOR YOUR SUPPLY CHAIN	TICK IF DONE
55. Establish due diligence checks in the appointment of suppliers and partners to establish their credibility, legitimacy and ability to manage labour rights in their own operations and their supply chain. Ensure suppliers and partners meet legal requirements for the recruitment and employment of workers in the country in which they are operating.	
56. Create formal written processes for staff visiting suppliers and partners to report and record suspected cases of labour trafficking, forced labour and hidden labour exploitation.	
57. Generate a system for highlighting issues relating to modern slavery for high risk suppliers and partners through third party ethical audits, ensuring that all issues identified are formally investigated and resolved.	
STEP 3: TRAIN STAFF AND SUPPLIERS AND PARTNERS	TICK IF DONE
58. Train all staff visiting suppliers and partners and service providers to spot the signs that may indicate worker exploitation and to report concerns to appropriate managers.	
59. Train suppliers and partners and labour providers on how to implement the company's policies.	
STEP 4: ASSESS WHERE YOUR COMPANY'S GREATEST RISKS OF SLAVERY OCCUR	TICK IF DONE
60. Draw up an initial high level assessment of your supply chain including direct and indirect suppliers and partners, labour providers and contractors to identify low, medium and high risk suppliers and partners.	
61. Identify which suppliers and partners you spend the most with in your supply chain.	

62. Identify suppliers and partners located in high risk countries where labour rights are not protected.	TICK IF DONE
63. Identify known high risk industries that have previously been affected by undeclared labour, illegal labour and a high incidence of trafficked persons.	
64. Identify where in your supply chain there are migrant workers who do not work under collective agreements.	
65. Identify where in your supply chain there is unskilled, temporary and/or seasonal labour.	
66. Identify where in your supply chain there are migrant workers/temporary staff employed under temporary contracts who are engaged by foreign or local temporary staffing agencies.	
67. Identify where in your supply chain there are subcontractors (possibly with several links in the supply chain), temporary staffing agencies and short-term seasonal contracts.	
68. Identify where in your supply chain there are job functions that are outsourced and carried out by migrant workers/temporary staff who are not immediately visible or noticeable because the work is carried out at night or in remote places.	
69. Develop a risk assessment and rating processes for your supply chain based on the above risks which allows you to prioritise your high and medium risk suppliers and partners. Lack of information about your supply chain should be highlighted as high risk.	
70. Refine your risk assessment through external engagement with stakeholders including customers, trade unions and NGOs.	
71. Gather additional information about high and medium risk suppliers and partners using tools including ethical audits and spot check visits.	
STEP 5: ACT – TO TACKLE THE RISKS THAT YOU HAVE IDENTIFIED	
72. Assess your available skills and resources in order to determine your ability to tackle high risk suppliers and partners. Consider the staff and finances you have available, your engagement with suppliers and partners, your engagement with government and civil society and your leverage over high risk suppliers and partners.	TICK IF DONE
73. Based on your available resources, take immediate steps to reduce the risk of high risk suppliers and partners. Steps taken may include: <ul style="list-style-type: none"> a. Additional, in-depth investigations of high risk suppliers and partners to gain further information about the risks of modern slavery b. Engagement of suppliers and partners where the risks identified relate to their suppliers and partners or to labour agencies c. Engagement of stakeholders including government, NGOs, industry bodies and civil society to understand further the risks of slavery d. Cessation of supplier relationships where no other option is available 	
74. Manage longer-term risks and prevent future risks occurring through: <ul style="list-style-type: none"> e. Investigations – undertaking regular ethical audits or other investigations at site level into working practices and working with suppliers and partners to resolve issues identified f. Building supplier and site capability – developing suppliers’ and partners’ ethical trade expertise through support and training and building sites’ human resources capability g. Accreditation – gaining third-party accreditation or certification at site or farm-level 	

TICK IF DONE

74. **Contd.**

- h. Government – influencing government to introduce legislation or infrastructure that tackles human rights risks
- i. Industrial relations – developing relationships with national trade unions and strengthening on site trade union capacity
- j. Collaborations – join existing industry collaborations or develop collaborations with customers, competitors, suppliers and partners, business associations, civil society, unions or public authorities to identify, report and/or tackle possible cases of slavery or human trafficking and reduce the cost of identifying and addressing issues. This may include engagement in multi-stakeholder initiatives such as Stronger Together.

75. Review and amend your business practices to ensure they do not exacerbate the risk of slavery, for example developing transparent and open relationships with suppliers and partners and customers, establishing clear, timely communication with suppliers and partners, paying a sustainable price, setting clear lead-times and payment terms and giving preference to suppliers and partners who respect human rights.

76. Develop channels for gathering and managing future risk information including building relationships with industry bodies, retailers/customers, NGOs, trade unions, on-site open door and human resource policies, whistle-blower and supplier hotlines, community-facing grievance mechanisms, audit processes and stakeholder engagement. Establish a process for responding to complaints or reported violations.

STEP 5: PROVIDE ACCESS TO REMEDY

TICK IF DONE

77. Require suppliers and partners to establish complaints/grievance procedures, issued to all workers and operating fairly and independently.

78. Verify that suppliers' and partners' labour providers have a complaints/grievance procedure, issued to all workers and operated fairly and independently.

79. Require suppliers and partners to establish a whistleblowing procedure for workers, supervisors and managers to confidentially raise issues of concern to a member of the senior team without fear of retribution.

80. Ensure that all potential cases of exploitation are thoroughly investigated. Seek support from relevant authorities where necessary and protect and support at risk individuals throughout any investigation.

81. Understand the root causes of exploitation and build learnings into future strategy.



(SOURCE: GLOBAL SLAVERY INDEX, 2016)

FACT

“ WE WILL NOT
TOLERATE,
NOR CONDONE,
ABUSE OF HUMAN
RIGHTS WITHIN ANY
PART OF OUR
BUSINESS OR
SUPPLY CHAINS.

