



HERTFORDSHIRE
Modern Slavery Partnership

**HELPING YOU
ADDRESS MODERN
SLAVERY WITHIN
YOUR BUSINESS AND
SUPPLY CHAINS**



Introduction

There are an estimated 40.3 million people living in conditions of modern slavery globally.¹ 16 million, including 3 million children, are thought to be in forced labour within the private sector today.² The UK government has named modern slavery the great human rights issue of our time and consequently passed the Modern Slavery Act in 2015. Section 54 of the Act requires all commercial organisations operating in the UK, supplying goods or services and with an annual turnover of over £36 million to publish a statement setting out what steps they are taking to ensure there is no modern slavery in their business and supply chains. This statement must be linked on the company's homepage, signed by a Director and approved by the Board of Directors.

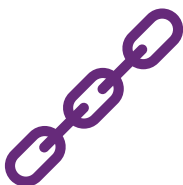
Fuelled by the demand for cheap labour, the human trafficking market is formed of highly sophisticated and organised global networks of criminals that are deeply embedded into the global economy. Businesses are seen as integral to the fight against this horrific crime, which is evidenced in new pieces of legislation, such as the Modern Slavery Act and the California Transparency in Supply Chains Act. Investors are starting to make business decisions based on ethics and whether the risk of modern slavery and other human rights issues is mitigated³. Even if businesses don't reach the £36 million threshold under the Modern Slavery Act, most will no doubt find themselves in another company's supply chain; having sufficient evidence of anti-slavery practices and policies is increasingly becoming part of business tenders. Businesses have been charged with modern slavery crimes and some have faced financial ruin because of subsequent settlements and fines⁴.

It only takes one case of modern slavery within your business for it to cause very serious reputational damage.



Human Trafficking -

the movement of people by means such as force, fraud, coercion or deception with the aim of exploiting them.



Slavery, Servitude, and Forced or Compulsory Labour -

ownership exercised over a person; or all work or service that is exacted from any person imposed by coercion or under the threat of penalty and for which the employee has not offered themselves voluntarily.

¹ <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

² http://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm; <https://www.alliance87.org/2017ge/modernslavery#!section=1>

³ <http://www.stopslaverynetwork.org/wp-content/uploads/2017/07/016.-Know-How-Guide-on-Human-Trafficking-Awareness-BRANDED.pdf>

⁴ <https://www.business-humanrights.org/en/corporate-legal-accountability/case-profiles/legal-case-map>

This document provides information to help companies draft a modern slavery statement in accordance with the Modern Slavery Act 2015. The below provides an overview of the key areas that should be included in a modern slavery statement as well as signposting to relevant materials to help with addressing these areas.

The key areas are:⁵

1. Organisational structure and supply chains
2. Policies
3. Due Diligence
4. Mapping Risk
5. Training
6. KPIs and Effectiveness

For general information:

- Go to Beyond Compliance: Effective Reporting Under the Modern Slavery Act (<http://bit.ly/SSHINBeyondCompliance>) for more information about adhering to the Modern Slavery Act.
- Go to Stop Slavery Hotel Industry Network resource hub (<http://www.stopslaverynetwork.org/>) which is a compilation of all best practice on the issue. This is a good one-stop shop for companies to go to for any information they might be looking for with regards to modern slavery and human trafficking.

How to Structure a Modern Slavery Statement:

1. Organisational Structure and Supply Chains

What should be included

This section would highlight where the company operates, what type of structure the business has and what subsidiaries, if any it has. It would cover the number of employees and type (i.e. seasonal, contract, full time). This is also where an overview of the supply chain would be provided, looking at which countries the company's goods are being sourced from, as well as a general overview of the supply chains. This section provides the context for the rest of the Statement.

2. Policies

What should be included

Policies should demonstrate a company's commitment to the issue and how coordinated their approach is. Policies can take the form of a single, but comprehensive "anti-slavery" policy or can be split in multiple policies covering key known risk areas, such as supplier codes of conduct, recruitment, procurement, child labour and whistle-blowing policies. It is also important to have some information on how any mechanisms detailed in the policies are enforced, as well as the process for policy development.

Where to get more information

- Shiva Foundation's Stop Slavery Blueprint has template policies on recruitment, employee rights, and a supplier code of conduct (www.shivafoundation.org.uk/Blueprint).
- The Walk Free Foundation has a Sample Code of Conduct (<http://bit.ly/SSHINCodeOfConduct>).
- Stronger Together has various template policies, such as on ethical trading, forced labour, and remedy (<https://www.stronger2gether.org/>).

⁵ These areas are recommended by the UK government. See: <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

3. Due Diligence

What should be included

This section should cover what processes are in place to ensure modern slavery isn't taking place within the business or supply chains. While having a policy in place is a good starting point, how can you ensure that the policies are being upheld internally and by suppliers? Do your processes include auditing or training of suppliers, for example? What are your processes if modern slavery is found? It is recommended that initially the company would work with the supplier to resolve the issue, instead of simply terminating the relationship.

Where to get more information

- The Stop Slavery Hotel Industry Network has created a Framework for Working with Suppliers (<http://bit.ly/SupplierFramework>) that details how to map risk and also engage suppliers in your work to address modern slavery.
- Recruitment is one of the areas that presents the biggest risk at any level within the supply chain. Verite's Fair Hiring Toolkit (<http://bit.ly/SSHINFairHiring>) offers advice on improving policies, raising awareness, strengthening assessments and social audits, etc.
- Stronger Together is one of the UK's leading organisations in this area, building the capacity of businesses and their suppliers with training, templates and guidance. See their Toolkit for UK Employers and Labour Providers and their guidance on Conducting Supplier Visits (<https://www.stronger2gether.org/>).
- The Walk Free Foundation has put together guidance on Questions to Ask Employees During a Social Audit (<http://bit.ly/SSHINSocialAudit>).
- BRE have an Ethical Labour Sourcing Self-Assessment (<http://bit.ly/BRE-ELS>) which can help any company see how they are doing with their labour sourcing processes in terms of addressing modern slavery. The basic assessment is free and companies can ask their suppliers to do their own self-assessments to understand their practices.

4. Mapping Risk

What should be included

Companies should conduct an assessment of their risk factors relating to modern slavery within their business and particularly within their supply chain. This process can involve identifying hotspot industries or source countries and then conducting a deep dive analysis into some of the high risk areas. This section can also include information about social auditing and risk assessments with action plans on how to assess and address risk, as well as develop broader efforts to eliminate modern slavery.

Where to get more information

- The Social Responsibility Alliance has created a free, open-source data collection template to help organisations map their risk within their supply chains (http://bit.ly/SSHIN_STRT).
- Different organisations, like Stop the Traffik (<https://www.stopthetraffik.org/>) and Hope for Justice (<http://hopeforjustice.org/>) will help businesses with their risk mapping at a fee.
- Verisk Maplecroft helps businesses with their risk mapping at a fee, and has a Modern Slavery Index (<http://bit.ly/VeriskMaplecroft>).
- Sourcemap can also help with mapping risk (<http://www.sourcemap.com/>).

- Companies can also use different guides to conduct their own risk mapping exercise using tools such as:
 - The US Department of Labor’s List of Goods Produced by Child Labor or Forced Labor (<http://bit.ly/SSHINChildLaborList>),
 - The Responsible Sourcing Tool (<http://bit.ly/SSHINResponsibleSourcing>),
 - The Walk Free Foundation’s Global Slavery Index (www.globalslaveryindex.org), and
 - The US State Department’s Trafficking in Persons Report (www.state.gov/j/tip/rls/tiprpt)

5. Training

What should be included

Training is key to ensuring policies are correctly implemented and for raising general awareness of modern slavery. Training builds the capacity of staff and suppliers in raising awareness about the issue and providing information on how to spot and respond to incidents. Training should be targeted based on role to have the greatest effect.

Where to get more information

- Stronger Together is a leading training provider, particularly for in-class training. There is a fee. (<https://www.stronger2gether.org/>).
- Organisations such as Unseen (<https://www.unseenuk.org/>) and Stop the Traffik (<https://www.stopthetraffik.org/>) will deliver training for businesses. There is a fee for this service.
- There is also online training from providers such as Vinciworks (https://vinciworks.com/courses/modern_slavery_act), which can be adapted to different industries. There is a fee for this service.

6. KPIs and Effectiveness

What should be included

Key Performance Indicators (KPIs) are important for driving performance. The current KPIs companies may use (i.e. cheapest product or short “turn-around” speeds) can unintentionally create environments where modern slavery becomes a risk. Additionally, how does an organisation know that any of its anti-slavery efforts are having an impact? Adding modern slavery related KPIs to a company’s performance can help ensure progress.

“It is hard to comprehend that such sickening and inhuman crimes are lurking in the shadows of our country. This is the great human rights issue of our time”

Theresa May, UK Prime Minister



About the Hertfordshire Modern Slavery Partnership:

The Hertfordshire Modern Slavery Partnership (HMSP) is a multi-agency anti-slavery partnership in Hertfordshire, made up of more than forty statutory and non-statutory agencies and charities, which has been set up to tackle modern slavery and human trafficking in the county. It was established to provide a strategic meeting framework for Hertfordshire to raise awareness, share information and proactively work together to ensure a consistent and robust approach to tackling modern slavery.