

Assessing the Risks Areas in your Supply Chain – Products

Use the table below to start thinking about some of the risks in your supplier chain. Note, this is not an exhaustive list but a starting point for your procurement teams to consider.

Food and beverage (Key High Risk Areas)

Agriculture

Agriculture poses a high risk for modern slavery due to its seasonal and labour-intensive nature, often relying on low-skilled and temporary workers. Labourers are vulnerable and often live in substandard housing at caravan parks/sites, shed/garages and shipping containers, making them susceptible to exploitation. Labour recruitment in agriculture is linked to extortionate recruitment fees, sub-minimum wages, high deductions, unsafe housing, and, in extreme cases, physical coercion and control by contractors.¹ The highest numbers of reported instances of modern slavery in the agricultural sector are concentrated in meat processing, particularly in poultry.²



Fisheries

The fishing industry poses a high risk for modern slavery, affecting many countries globally, especially in seafood production (shellfish gathering). Reports have shown that the majority of UK cases of modern slavery, related to shellfish gathering concerns the following shellfish products: cockles, periwinkles and mussels. Workers in this sector receive significantly low wages, are constrained due to the seasonal nature of the work and the lack of formal employment agreements.³

Questions to consider when assessing your risk:

- Does your hotel offer meat products or feature a large selection of poultry items on the menu?
- Is the cost of your agricultural products significantly lower than the standard market rate?
- Does your hotel serve seafood, include cockles, periwinkles and mussels?
- Is the price you pay for your seafood significantly lower than the standard market rate?
- Does your supplier of agricultural and seafood products have a code of conduct or modern slavery statement in place?

1 Office of the Independent Anti-Slavery Commissioner and the University of Nottingham Rights Lab (2018) Agriculture and Modern Slavery Act Reporting: Poor Performance Despite High Risks

2 Gangmaster & Labour Abuse Authority (2020) Industry Profiles – Food Processing and Production - 2020

3 Gangmaster & Labour Abuse Authority (2017) The Nature and Scale of Labour Exploitation across all Sectors within the United Kingdom

This guidance has been created to be used along with the Stop Slavery Blueprint.

Learn more: www.shivafoundation.org.uk/our-work/stop-slavery-blueprint

Uniform, bedding/linen and other textiles (Key High Risk Areas)

The fast fashion industry has added significant pressure to suppliers to increase production while lowering costs. In the hospitality sector, this pressure is evident in the provision of uniforms, bedding and linens. Providing uniforms, linen, and bedding is high-risk due to the garment and textile industry's known issues with labour exploitation, including child labour. International textile supply chains including countries such as India, Bangladesh, Pakistan and Nepal can the risk of child labour.⁴ Textile suppliers located in the UK, particularly in the East Midlands (such as Leicester) have historically been sites of modern slavery exploitations. Risks for this sector includes exploiters accommodating victims in substandard housing, non-payment of minimum wage and neglect of workplace safety regulations, putting the lives of the workers at risk.⁵



Questions to consider when assessing your risk:

- Are you aware of the full supply chain of your linen bedding and textile production, including the countries involved in production?
- Have you assessed the risk of child labour in your international textile supply chains?
- Are your textile suppliers located in the UK, particularly in areas historically associated with modern slavery exploitation like the East Midlands (e.g., Leicester)?
- Is the price you pay for your uniforms, linen and bedding significantly lower than the standard market rate?
- Do the suppliers of these products have a code of conduct or modern slavery statement in place?

Electronics and Technology (Key High Risk Areas)

Electronic devices and technology often involve complex supply chains with components sourced globally. The electronics industry has faced scrutiny for exploitative practices, particularly in the extraction of rare minerals. Forced labour practices in the electronics industry have been documented across Congo, China and Malaysia. The electronics industry is particularly susceptible to forced labour due to inadequate laws and regulations, weak enforcement of fundamental labour rights, high levels of poverty, and the increasing use of third-party labour recruitment agencies.⁶



⁴ International Labour Organisation (2023) Child Labour in South Asia

⁵ Gangmasters and Labour Abuse Authority (2020) Industry Profiles – Textiles Industry – 2020

⁶ Electronics Watch: Supporting Compliance with the Modern Slavery Act Briefing Note

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Questions to consider when assessing your risk:

- Are you aware of the full supply chain, including the countries involved in production, of any electronics and technology you use in your hotel?
- Have you looked into international labour standards for this sector and made steps to include these standards in your risk assessment?
- Is the price you pay for your electronics and technology significantly lower than the standard market rate?
- Do the suppliers of these products have a code of conduct or modern slavery statement in place?

**Construction Materials
(Key High Risk Areas)**

During hotel construction or renovations, materials like steel and concrete may be sourced from supply chains with potential risks of forced labour, especially if they originate from regions with weak labour regulations. In quarries, recycling yards, smelting plants, factories, and assembly lines, migrant and low-skilled labourers face similar abuses to those on site. Sectors involved in raw material production may have a higher risk of human rights violations, including child labour.

This sector is particularly vulnerable due to constant pressures to undercut prices, multiple complex layers within the supply chain, lack of management oversight of purchasing practises and corruption in the supply chain, especially when demands substantially increase at the very last minute.⁷



Questions to consider when assessing your risk:

- Are you aware of the full supply chain of your construction materials, including the countries involved in production?
- Is the price you pay for construction materials significantly lower than the standard market rate?
- Do the suppliers of these products have a code of conduct or modern slavery statement in place?

⁷ CIOB (2021) Tackling Modern Slavery in Construction. Report: Building a Fairer System: Tackling Modern Slavery in Construction Supply Chains.