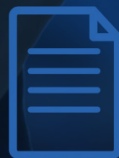# Assessing your
MODERN SLAVERY
Risk

A Self-Assessment Scorecard and Supporting Guidance for Local Authorities

SHIVA FOUNDATION

MEKONG CLUB

STOP THE TRAFFIK
PEOPLE SHOULDN'T BE BOUGHT & SOLD

Section 1:
About this guide and how to use it

1. About this guide

The self-assessment scorecard and this corresponding guidance were jointly created by [Shiva Foundation](#), [The Mekong Club](#) and [Stop The Traffik](#) to better support local authorities in assessing key risk areas of modern slavery in their operations, supply chains and other areas of work.

One motivation for creating this scorecard was the Government's ambitious package of measures to strengthen the [Modern Slavery Act's](#) transparency legislation including, amongst other things, extending the reporting requirement to public bodies with a budget of £36 million or more. However, this scorecard goes beyond the requirements of the MSA. While the scorecard does cover procurement and supply chains, it also aims to cover activities that may be undertaken by other departments too, such as adult and child safeguarding, local and community engagement, commissioning etc. The aim is to move towards a more collaborative approach to modern slavery where indviduals across departments are working together. We, therefore, encourage those filling out this scorecard, to do it in a holistic manner, by collaborating with other departments, possibly by creating a cross-functional team.

1.1 Who is the self assessment for?

The self-assessment has been created to help local authorities in particular to identify clear steps to improve their response to modern slavery. It is based on learnings from a number of consultations, desk-based research and interviews.

If you are already reporting or seeking to report under the MSA, this scorecard will help you confidentially self assess how you are doing and identify areas in which you can improve. This guide is not to supersede any other legal requirements you may have in your role and organisation and should be read alongside such requirements.

While the scorecard is tailored to local authorities, it is based on an understanding of public sector realities, as outlined below, and so it is also open to all public organisations to use.

1.2 What is the self assessment scorecard?

The self-assessment scorecard is an online form containing 12 key thematic questions. On completion, you will be provided with a score out of 400, along with a 'level of change' rating, which demonstrates your organisation's relative modern slavery risk. Referring to **Section 2** of this guide in tandem with completing the self assessment scorecard will ensure that you select the most appropriate answer at each stage of the assessment.

Self-assessment can be a powerful instrument to confidentially evaluate what is currently working well in your organisation and to identify areas which require further support and improvement. This scorecard is best completed in consultation with those who are involved in your organisation's day-to-day operations and the senior management team. This includes those who oversee the procurement, contracting, supplier engagement/ management as well as those who are responsible for employee policies. The final report from the self-assessment is also best reviewed by these individuals. You can determine how frequently the scorecard is repeated in order to check on your organisation's progress. We recommend you review it annually, prior to publishing your modern slavery statement, so that you can accurately report your progress and gaps accordingly.

This section of the guide outlines how to complete the scorecard. Be sure to read this before you proceed with completing the scorecard. If you are completing the scorecard on behalf of your organisation, you can use the list of questions outlined in Annex 4 in order to consult with the relevant departments and collate your answers in advance of completing the form.

1.3 What is this guide?

Section 2 of this guide provides explanations to accompany each key question along with further guidance on how you can improve your score. It utilises a colour-coded approach with four levels of change that you might fall into:

| No Action | Developing | Advancing | Leading |
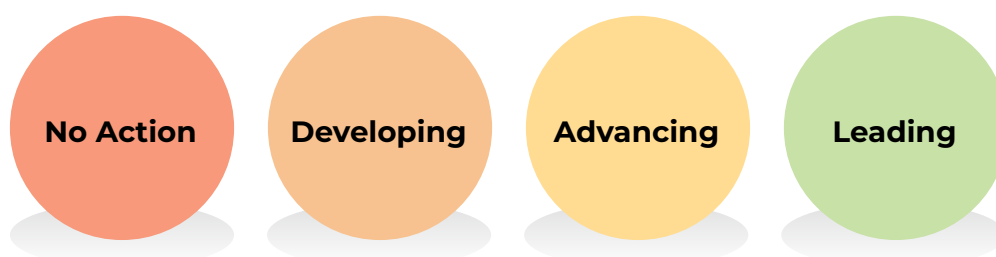
Section 2 of the guide is organised by key thematic action areas - eight themes each relating to a particular set of actions you can take to address modern slavery in your organisation. Under each theme, you will find a table organised by the colour-coded levels of change. These tables will help you decide how far along you are on your journey in tackling modern slavery and allow you to answer each question in the self assessment scorecard accurately. As you complete the self assessment, you will be signposted to the relevant section in the guide where you will find further resources, templates and advice so you can improve your modern slavery approaches in the short, medium and long term. The resources listed have been selected with resource constraints in mind and so are primarily free to use.

Note to readers: This guide is intentionally detailed so we recommend you dip in and out of it as you require. It is not designed to be read front to back once and then put away. After completing the scorecard, we invite you to find the sections which are most useful for you and engage with them first. You can then move onto other areas as you progress. You will already be carrying out a number of actions to tackle modern slavery so you can address each step in bite-sized steps depending on your needs and priorities.

It is important to note, also, that self-assessments like this only achieve change when the information provided is taken forward and actioned in a sustainable way, otherwise it can remain a mere tick-box exercise. Addressing modern slavery abuses will require great concerted effort between all the different stakeholders and we hope this can be one step towards that.

1.4 Why is it relevant now?

As you will know, the MSA sets out how modern slavery should be tackled within the U.K. Under Section 54 of the MSA, private sector businesses with an annual turnover of £36 million or more are required to publish an annual modern slavery statement. While broadly considered a light-touch approach, it enables both consumers and civil society organisations to hold big businesses to account when addressing modern slavery and trafficking risks in their business and supply chains.

Under the MSA, this requirement does not currently apply to you, as public bodies. However, in 2020, the government committed, in its response to the [Transparency in supply chains consultation](), to take forward a package of changes to strengthen the act's transparency legislation. The government recognised that as the U.K. public sector amounts to approximately £250 billion in annual spend, there was a powerful opportunity to directly impact modern slavery through this sector.

The government announced that it will require public bodies with a budget of £36 million or more to report on how they prevent and address modern slavery risks in their operations and supply chains. On 25 November 2021, ministerial government departments voluntarily published their first annual modern slavery statements. Mandating this across public bodies requires a legislative change which has not been implemented at time of publishing. In the meantime, public bodies have been encouraged to voluntarily publish their own modern slavery statements on their own websites and the government's modern slavery statement registry. Using this self assessment scorecard and guidance will allow you to gauge your modern slavery risk and take meaningful action within your organisation in preparation for this shift.

Given the number of local authorities (333), Fire and Rescue Services (45), NHS Trusts (223) and Police Forces (45) around the country, the current rate of voluntary reporting is low. Approximately 16 of 646 organisations published a modern slavery statement in 2020 and/ or 2021, as shown on the Home Office Registry. And while the Local Government Association (LGA) have published 167 modern slavery statements on their website from public sector bodies and 13 from Fire and Rescue Services, most of these statements are not up to date. This means there is an opportunity to take meaningful action together now. We hope this self assessment scorecard and guidance can act as a supporting framework for your organisation to either begin your journey tackling modern slavery or build upon what you are already doing.

As leaders in local authorities, you have an incredible opportunity to influence good practice through your policies and practices across departments. Likewise, we know there is a desire to build in effective tools to mitigate the risk of modern slavery within your operations and supply chains, and to report accordingly. Interviews we conducted in preparation for creating this guidance also showed us that there are many challenges and gaps in taking some of this work forward. A summary of the key findings resulting from these interviews are outlined in **Annex 6**.

In addition to these interviews, we also conducted in-depth analysis of the modern slavery statements published on the Local Government Association website against the government's guidance (see **Annex 7** for a summary of this analysis) and STOP THE TRAFFIK conducted risk mapping for two local councils (see **Annex 1** for the case studies). The rich discussions that took place during this research phase provided deep insight into the work of and challenges for organisations like yours, as well as some of the specific needs regarding addressing modern slavery.

The questions in the self assessment scorecard have been framed using these insights to help you:

Recognise where you are doing well.	Identify where your challenges and gaps lie.	Access further resources to improve the responses to modern slavery in your organisation.

> **!** The self-assessment scorecard results will not be publicly shared and solely exists for you to assess your own organisation's efforts and identify opportunities for you to work towards best practice.

While this guide seeks to address the key concerns arising from the interviews, one aspect it is not able to address is the lack of capacity and resources needed to do this work well and we acknowledge the important work of those advocating for this at a local and national level. Given the understanding that local authorities and other public bodies face various funding and resource constraints, the scorecard and guide have been created to help any size organisation use its leverage effectively to tackle modern slavery.

We also recognise that several local authorities will already be implementing some of the practices outlined below and are part of wider collaboration opportunities to share their experiences and resources with one another (see **Section 2** on Wider modern slavery collaboration for more information). We invite you to explore the guidance below and implement what you can given the limitations you face, and to also continue to gather evidence on why this work needs more resources and support.

Cllr Meenal Sachdev
Director, Shiva Foundation

With recent estimates indicating as many as 100,000 victims of modern slavery in the UK, we cannot neglect the issue and must recognise that we all have a part to play. From co-creating and coordinating the Hertfordshire Modern Slavery Partnership for several years, we have seen first-hand the difference that can be made at the local level. We hope this robust guide and accompanying self-assessment scorecard builds on the good work that is already being done and provides further guidance for Local Authorities looking to address modern slavery in their operations and supply chains. We hope to see many Local Authorities using it to help protect vulnerable people from exploitation.

# 2. How to complete the self-assessment scorecard

The self assessment scorecard is an online questionnaire containing 12 key thematic questions and 36 sub-questions on modern slavery risk in your organisation's operations and supply chains. The number of questions you answer in total depends on whether you have existing practices in place or not.

The key thematic action areas covered in the self assessment scorecard are:

	Modern Slavery Statements and Policies
	Internal Awareness Training
	Modern Slavery Leads
	Risk Assessments
	Procurement Protocols and Supplier Engagement
	Audit Protocols
	Reporting and Remediation protocols
	Wider Modern Slavery Collaboration

Each question is given a maximum number of points that you can score. **Your total score, out of a possible 400, along with a 'level of change' rating, will be shared on completion of the questionnaire**. You will also receive a report outlining which of the four levels of change - your organisation is currently sitting at when it comes to tackling modern slavery. You will be given a detailed breakdown by question as well as an overall score. Using the report, along with this guide, you will be able to map next steps for your organisation.

No Action **Developing** **Advancing** **Leading**
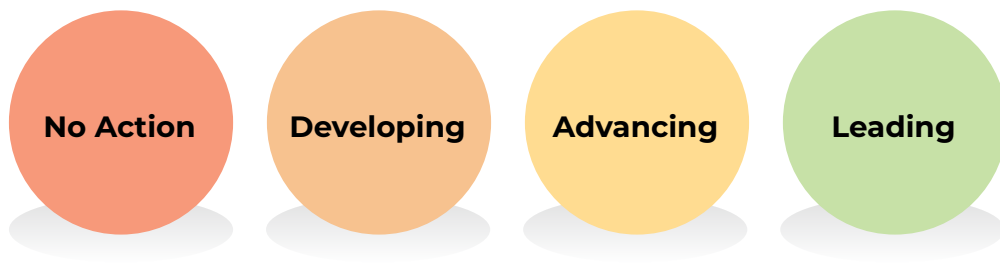
> ⚠️ Due to the breadth of areas that this tool touches upon, we strongly recommend gathering as much information as possible in advance of starting the scorecard in order to accurately answer all the questions. The form will save your answers upto 19 days for you to return to later.

For the full list of questions and sub-questions, see **Annex 4**. This can be used as a checklist and tracker as information is gathered from different departments.

In the next section of this guide, you will find detailed guidance aligned to each key thematic action area.

Tables 1, 2, 3 and 4 below provide a summary of the different levels of change, the corresponding multiple choice options in the scorecard and the number of points allocated.

LEVEL OF CHANGE	NO ACTION
COMMENTARY	The red tables do not appear in the next section of the guide but, if no known action has been taken in the relevant area, you should explore the guidance in the other tables to support you to move forward.
SCORECARD	Select **"No"** or **"Don't know"** in the scorecard if you think your organisation fits here.
POINTS	If you select this option, you will be allocated 0 points.

Table 1: No Action classification table.

LEVEL OF CHANGE	DEVELOPING
COMMENTARY	If you are doing what is outlined in the amber tables, this means you are **likely at the very beginning of your journey**. You might have held discussions and forums, put together action plans and started gathering resources in relation to this area. You may have identified that this is a focus area for development for your organisation. You likely require education, learning and development in more or all aspects of the relevant area to effectively manage risks. Explore the yellow and green tables for ideas on how to build on the foundations you have already laid.
SCORECARD	Select **"Partially"** in the scorecard if you think your organisation fits here.
POINTS	If you select this option, you will be allocated 5 points.

Table 2: Developing classification table.

LEVEL OF CHANGE	ADVANCING
COMMENTARY	If you are doing what is outlined in the yellow tables, this means that you have been **on this journey for a while**. You might have tailored resources for your organisation and begun the process of implementation. You may have also started evaluating your approach to test its effectiveness. You have some evidence of progress in this area, but further improvement is needed. You likely require education, learning and development in some aspects of the relevant area to effectively manage risks. Explore the green table for ideas on how to improve on what you are already doing.
SCORECARD	Select **"Mostly"** in the scorecard if you think your organisation fits here.
POINTS	If you select this option, you will be allocated 10 points.

Table 3: Advancing classification table.

LEVEL OF CHANGE	LEADING
COMMENTARY	If you are doing what is outlined in the green tables, this means that you are **currently implementing best practice** approaches in your organisation. You have identified all your risk areas, put frameworks in place to effectively mitigate risks and regularly evaluate and improve your systems. This area is a key strength with good evidence of impact and/or enforcement. You are effectively managing risks in this area and should continue to do so.
SCORECARD	Select **"Yes"** in the scorecard if you think your organisation fits here.
POINTS	If you select this option, you will be allocated 20 points for this question.

Table 4: Leading classification table.

Section 2:
Assessing your modern slavery Risk

This section of this guide is organised by key thematic action areas. Under each one you will be able to read:

- a summary of why the **specific thematic area** is important when seeking to tackle modern slavery in your organisation;

- a table that outlines what it would mean for your organisation to be **Developing**, **Advancing** or **Leading** in this area;

- guidance on how to fill in your **self assessment scorecard** for this area;

- **further advice** outlining practices you might want to consider developing in your own organisation; and

- signposts to more **resources and templates** to support you to move forward on your journey in tackling modern slavery.

There is one table for each of the following key thematic action areas:

	Modern Slavery Statements and Policies
	Internal Awareness Training
	Modern Slavery Leads
	Risk Assessments
	Procurement Protocols and Supplier Engagement
	Audit Protocols
	Reporting and Remediation protocols
	Wider Modern Slavery Collaboration

These thematic areas are based on the Home Office guidance for statements accompanying the Modern Slavery Act (MSA), our own research on local authority statements (see **Annex 7**) and best practice. Under the MSA, public bodies may soon be required to publish a **Transparency in Supply Chains ("TISC")** statement outlining the steps the organisation has taken during the financial year to ensure that slavery and human trafficking are not taking place in any of its supply chains and in any part of its own business. This is different from a general commitment to tackle modern slavery as it requires you to go further in outlining

the specific steps you have taken over the past year. It is also public facing as organisations would be required to publish it on their websites.

Finally, it is important to make your interventions sustainable and translate your organisation's statement(s) into practical actions. Organisations should set clear standards and expectations for staff, suppliers, and stakeholders and these should be integrated within your existing **policies, practices and decision-making procedures**.

1. Modern Slavery Statements and Policies

Modern slavery statements are important, usually public-facing, documents which outline your organisation's commitment to tackling modern slavery in your organisation and supply chains.
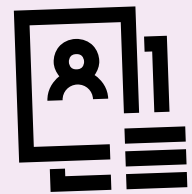
Statements can be a powerful way to allow staff, clients, partners and suppliers to see the commitment regularly and be aware of the organisation's efforts to address the problem. It can remind and inspire others to do the same while also serving as an accountability mechanism for your organisation.

This will look different depending on how your organisation operates but you can find some examples below.

A statement, code of conduct or policy provides a framework for the organisaton's modern slavery strategy. This may be achieved by either developing a standalone modern slavery policy, or through a combination of documents such as a supplier code of conduct, internal labour policies, procurement policies, human resources training guides etc.

Robust modern slavery statements should cover recruitment, labour rights abuses, procurement and supply chains, reporting and remediation practices both within the organisation and its suppliers:

- **Recruitment:** The recruitment process can harbour modern slavery risk, from excessive recruitment fees, to fraudulent employment contracts. It is recommended to ensure a **clear stance on recruitment expectations** is made within your policies and procedures.

- **Labour rights abuses:** Often **restricting movement**, requiring them to stay in specific accommodation, forced overtime, unacceptably low wages or wage theft, no maternity leave, no health and safety standards etc. are used by exploitative employers to control their employees. Withholding of passports or other personal documentation is also a practice used in order to establish control and further restrict movement. These are labour rights abuses and must be explicitly banned. Trade unions can often offer support and information about rights to workers. Explicitly naming trade unions as a place for support in your policies will strengthen them against modern slavery risk.

- **Procurement and supply chains:** The procurement of goods and/or services holds risk of modern slavery within an organisation's supply chains, as often you do not have direct administrative oversight of the conditions of the individuals doing the work. This can be the case for **subcontracted labour**, such as, cleaning staff, security guards, refuse collectors that are employed through a third-party. This can also be the case for

workers producing the products you purchase, whether that's within the U.K. or not. Unless you specifically investigate, you are unlikely to know the **working conditions** of those, for example, making the furniture in your offices, or supplying your food.

Unfair purchasing practices, such as unreasonably low payment terms, can also lead to putting undue pressure on suppliers that can result in decisions that negatively impact worker wellbeing. Including safeguards against this in policies can protect suppliers and workers from unfair conditions. It is recommended you also ensure that suppliers are implementing modern slavery standards that are in line with your own standards where possible. This can be done via your procurement policy, for example, **encouraging accountability through the supply chain**.

- **Reporting and remediation:** Providing employees and subcontracted workers with a mechanism through which they can **report issues** with their employment allows the organisation and the supplier to assess whether policies are working on the ground. Therefore it is recommended you include this as part of your modern slavery policies.

  If a modern slavery issue is uncovered, it is important that the local authority and supplier involved is able to **act quickly to protect victims and ensure that the root cause of the issue is resolved**. Therefore, it is recommended that you add a remediation element to your policies and procedures, to ensure a proactive response. If abuses are discovered, it is advisable to engage with them rather than dropping them as a supplier immediately which can put people at further risk.

Following the guidance of the MSA, it is advisable that your senior leaders sign the statement, code of conduct and/or policy and that it is linked from a prominent position on your organisation's website. Senior management sign off indicates buy in and ensures accountability for the modern slavery strategy. Best practice includes dedicating time for modern slavery discussion in management meetings, setting up modern slavery working groups with leadership representation and embedding clear escalation chains for crucial information sharing. More information on publishing an annual modern slavery statement can be found on the UK Government website.

You can use Tables 5, 6 and 7 to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> **!** Tables 5, 6 and 7 correspond to **Question 1** in the Self-Assessment Scorecard

LEVEL OF CHANGE	DEVELOPING
APPLICATION	**Writing a Statement** ■ You have a simple statement expressing your commitment to tackling modern slavery generally. ■ Statement is accessible to employees. **Senior Buy-In** ■ You have included members of Senior Management in this process of creating a modern slavery statement.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below to start working on your modern slavery statement and policies.
FURTHER RESOURCES	For support and guidance in putting together a Modern Slavery Statement, please see the following resources: ■ Gov UK: Publish an Annual Modern Slavery Statement ■ Gov UK: Modern Slavery Statement Registry ■ CORE: Recommended Content for a Modern Slavery Statement ■ TISC Report: Modern Slavery Statement Builder ■ HMSP: How to Write a Good Modern Slavery Statement ■ GOV.UK: Procurement Policy Note ■ BHRE/LUPU: Preparing a Slavery and Human Trafficking Statement: Guidance for Higher Education and the wider Public Sector

Table 5: Developing classification table for Modern Slavery Statement and Policies

LEVEL OF CHANGE	ADVANCING

APPLICATION	**Writing a Statement**
	■ You have ratified a modern slavery statement, which directly addresses the following areas:
	  – Recruitment
	  – Labour rights abuses
	  – Procurement and supply chains
	  – Reporting and remediation
	■ Your suppliers are mentioned in your statement.
	■ Statement is accessible to employees and communicated directly to them.
	
	Developing Policies
	■ You are developing policies which embed the commitments in your statement into existing policies, practices and decision-making procedures. This may include the following:
	  – A Supplier Code of Conduct
	  – Internal labour policies
	  – Procurement policies
	  – Human resources training guides
	  – Policies are accessible to employees and communicated directly to them.
	
	Senior Buy-In
	■ A director or C-level employee has signed off this policy.
	■ This statement is publicly available.

SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your statement and policies in line with best practice.

| FURTHER RESOURCES	You can refer to the following guidance documents to assist with putting together modern slavery policies: ■ Local Government Association: Local Authorities Modern Slavery Statements ■ Rushax: Anti-Slavery Policy Template ■ Verite: Sample Code of Conduct Provisions ■ IHRB: 6 Steps to Responsible Recruitment ■ Verite: Fair Hiring Toolkit

Table 6: Advancing classification table for Modern Slavery Statement and Policies

LEVEL OF CHANGE	LEADING
APPLICATION	**Writing a Statement** ■ You have ratified a modern slavery statement which directly addresses the areas outlined in the 'advancing' table. ■ Your suppliers are directly addressed in your statement. ■ You have specifically outlined key risk areas (e.g. for local authorities this would be construction, facilities management and care sector, among other things) within your statement (for more info on assessing risk see below). ■ You have outlined specific and tangible steps to address these risks in the future. ■ Statement is accessible to employees and communicated directly to them. **Implementing Policies** ■ You have policies which directly address all of the areas mentioned in the 'achieving' table. ■ In each area, you have clearly demonstrated a commitment to ethical practice. ■ For each area, you have outlined your process of checking and ensuring compliance. ■ As part of these policies, you require your suppliers to implement the same level of modern slavery standard within their own supply chains and this expectation is clearly stated within your policy. ■ Policies are accessible to employees and communicated directly to them. **Senior Buy-In** ■ A director or C-level employee has signed off this policy. ■ You have set aside dedicated time to talk through modern slavery issues in management meetings or set up working groups with leadership representation. ■ There is a clear chain of escalation for crucial information relating to modern slavery cases. ■ This statement is publicly available, including visibly on the homepage of your website and on the online registry. ■ You have made a public commitment to regularly review your modern slavery statement or policies.
SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your statement and policies in line with emerging best practice.
FURTHER RESOURCES	You can refer to the following further guidance documents to assist with putting together modern slavery policies: ■ Sample Code of Conduct ■ SME Toolkit (page 3-4) ■ Shiva Foundation Stop Slavery Blueprint (pages 7-8)

Table 7: Leading classification table for Modern Slavery Statement and Policies

2. Internal Awareness Training

In order to ensure that modern slavery expectations and policies are met, staff and suppliers must be trained on modern slavery, particularly how risk can be present within the organisation's practices and supply chain management.
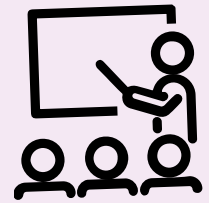
This includes raising staff awareness of modern slavery generally, through specialised training. This should be targeted to staff with particular roles and responsibilities where there is medium to high risk of modern slavery, such as those working in procurement, care home services, construction and facilities management.

Modern Slavery Coordinator

"In addition to the compulsory eLearning module and the bespoke team training, we also have a modern slavery champions package: an eight-hour training package delivered in four sessions for self-selecting employees of the council who feel like they're more likely to encounter victims and want to have a more in-depth knowledge. It has a modern slavery introduction, but then we go really in depth on the [National Referral Mechanism], and look at a case to think about how one might work through it and what partners and resources they might use. There is then a final session, which includes reflections and works through any final questions that people have."

Training should specifically address modern slavery, **differentiating from broader trainings** on human rights and other sustainability issues such as climate change. Additionally, this training should be distinct from overall safeguarding or training on how staff may encounter victims in the services they provide the public.

It is recommended that training sessions be **facilitated by experts**, in consultation with managers, for individuals and departments throughout the organisation. This training should be designed to **go beyond awareness raising** in order to help each employee understand his or her role in tackling this issue. Training should be **tailored by role and department** to have the most impact and relevance.

Whilst remote learning can be cost-efficient and enable greater reach, it is recommended that in-person training or a blended format is offered alongside an online training offering. In-person training, not only enhances learner engagement with the subject content but provides learners with the opportunity to raise queries in real time with subject-matter experts (or training facilitators), deepen relationships and actively engage in peer-learning.

Responsible Procurement Manager

"So the training itself is relatively generic, but it is specifically focused on supply chains…then what we're going to do is…[identify] our top highest risk contractors by using the…home office tool, and we're going to be doing little deep dive sessions with different categories of spend. So we're going to have a construction workshop, and a hardware / electronic goods workshop. So dividing them into those categories of spend. And that's going to be like "doing our homework together" session where they're going to be checking the results of our assessment, whether or not we think their contracts are high, medium or low risk, and telling us a bit more [about the] contracts so that we can definitely make sure that we're getting the risk assessment correct. And we're then going to be looking at the slavery statements of the suppliers that they have to deal with, and seeing where the gaps are, and then plan an action plan forward from there."

Trainings should include:

- Background information on the issue

- Key indicators of modern slavery

- Legislative requirements

- Practical steps that can be taken if there is a potential modern slavery concern

- Explanations of relevant policies and protocols

- Practical examples and case studies

- Information on how to reassure staff when they've reported something, regardless of the outcome

- Information tailored to specific roles and departments

In order to ensure knowledge retention, it is recommended that staff are **tested** after the training, and that the content is **refreshed** on a regular basis.

You can use tables 8, 9 and 10 below to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> **!** Tables 8, 9 and 10 correspond to **Question 2** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	**Access to Training** ■ You have provided internal access to modern slavery knowledge to some of your staff. ■ It may be part of generic employee training, safeguarding modules or human rights training. **Training Format** ■ Training is remote only and optional. ■ A basic e-learning course is provided.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below to start working on your internal awareness raising activities.
FURTHER RESOURCES	For support and guidance in finding training materials relevant to you, please see the following resources: ■ Home Office: Child Slavery E-Learning ■ Gov.Uk: Modern Slavery Training Resource Page ■ Home Office: Modern Slavery Awareness and Victim Identification Guidance ■ GLAA: Training Videos ■ Anti-Slavery London Working Group: Adult Modern Slavery Protocol for Local Authorities ■ Home Office: A Typology of Modern Slavery Offenses in the UK ■ Shiva Foundation: Stop Slavery Blueprint (pages 20-21) ■ Gloucestershire Anti-Slavery-Partnership: Information and resources ■ CIPs: Procurement e-Learning ■ Gov Commercial College: Training There are many external training providers available too. We recommend you find one that is local to you and that can tailor training to your specific roles and departments. If you are unsure of where to start, Unseen provides a modern slavery training programme used by some local authorities nationally.

Table 8: Developing classification table for Internal Awareness Raising.

LEVEL OF CHANGE	ADVANCING

APPLICATION	**Access to Training**
	■ You have provided internal access to modern slavery training to most of your staff.
	■ This is a standalone training and specifically addresses modern slavery, differentiating from generic employee training, safeguarding modules or human rights training.
	
	Training Content
	■ Training includes at least:
	  – Definition of modern slavery and key terminology
	  – Explanations of relevant policies and protocols
	  – Modern slavery statement
	  – How to identify and address risks in the supply chain / procurement management
	  – How to identify and address labour rights risks
	  – Key indicators of modern slavery
	  – Legislative requirements
	  – Reporting protocols
	
	Training Format
	■ Training includes at least some in-person elements and is compulsory for at least most of your staff.

SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your internal awareness raising activities in line with best practice.
FURTHER RESOURCES	The following resources can be used to assist with training development: ■ HMSP Basic Level Training ■ Hope for Justice training ■ Supply Chain Sustainability School: modern slavery resources ■ Skills for Care: Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking ■ Skills for Care: Training Framework for the Prevention, Identification, Support and Care of Child Victims and Survivors of Modern Slavery and Human Trafficking ■ Hestia: Modern Slavery Training ■ Gov UK: National referral mechanism guidance: adult (England and Wales)

Table 9: Advancing classification table for Internal Awareness Raising.

LEVEL OF CHANGE	LEADING

APPLICATION	**Access to Training**
	■ You have embedded compulsory standalone modern slavery training for all members of your staff as standard practice.
	
	Training Content
	■ The training includes all elements highlighted in the Advancing table as well as:
	  – How to identify and address risks in the supply chain / procurement management
	  – Department specific guidance
	  – Legislative requirements
	  – How to identify and address labour rights risks
	  – Practical examples and case studies
	  – Prevention protocols
	  – Remedy options
	  – Monitoring and evaluation
	  – Information on how to support staff when they've reported something, regardless of the outcome
	
	Tailored for Role
	■ Frontline staff, who would likely encounter modern slavery, are given specific training to spot the signs of slavery and to ask specific questions to uncover potential offences. This training is specific to their department. These frontline staff maybe be from the following departments:
	  – Fire and rescue services
	  – Police officers
	  – Licensed premises contract managers or inspection officers
	  – Housing inspection officers
	  – Auditors
	  – Procurement officers
	
	Training Format
	Where possible, aspects of the training are delivered in-person.
	
	Knowledge Retention
	All staff are tested following training to encourage knowledge retention.
	Training content is reviewed and refreshed on a regular basis. This cadence is shared widely.

SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your internal awareness raising activities in line with emerging best practice.
FURTHER RESOURCES	The following resources can be used to assist with training development: ■ Home Office: First Responder Training Programme ■ HMSP Advanced Level Training ■ CIPS Ethical Procurement and Supply Training module ■ NPCC Modern Slavery and Organised Immigration Crime Unit: Child Victims of Modern Slavery Training Programme ■ ATLEU: Online Training Programme ■ Home Office's Modern Slavery Unit and Joint Security and Resilience Centre's e-learning course for public sector commercial staff at all grades

Table 10: Leading classification table for Internal Awareness Raising.

3. Modern Slavery Leads

Having a 'point person / team' for tackling modern slavery is good practice and encourages better communication and dissemination of knowledge and expertise.

Modern Slavery Coordinator

"We don't have one person who's just looking at modern slavery in our supply chains. I hold the modern slavery portfolio, but I very much focus on the operational side of things. So, we don't have one colleague who's looking at it within procurement. That knowledge is quite disparate to different people. It can be hard not having someone leading on it, to then work out how to pull all these conversations together."

Modern slavery leads should be made known to staff and **provided with the resources and training required for this role**. If it is a whole team, having stakeholders representing different functions within your organisation will help further embed modern slavery mitigation work. Ideally this person / team has received training on how modern slavery may impact all parts of the organisation, and is well-equipped to direct enquiries to the right internal department if they do not know the answer themselves. This person should be responsible for adapting processes according to learnings and sharing information from identified trends and national policy changes.

Modern slavery leads can have various titles and roles across different organisations such as the police and local authorities. For example, Birmingham City Council has an existing standalone role for a modern slavery lead role, 'a Modern Slavery Coordinator', which works across the city, whilst Hampshire Police, have a 'Modern Slavery County Coordinator' role which is based within the Office of the Police and Crime Commissioner for Hampshire. Some bodies take a partnership approach to modern slavery such as the Royal Borough of Kensington and Chelsea and Westminster who share a 'Modern Slavery and Exploitation Coordinator'. Uniquely Wales takes a more central approach, with a 'Head of Modern Slavery and Workers' Rights'.

However, the vast majority of local authorities do not have an existing modern slavery role and rely on the involvement of professionals from other departments, such as Procurement and Human Resources to spearhead modern slavery initiatives across the organisation and join local and national groups.

It is important that **staff members have easy access to knowledge, expertise and support** when it comes to tackling modern slavery. Best practice would involve having an internal modern slavery team / unit who are able to support across departments as queries arise. Since this is resource intensive, an alternative would be to have an internal modern slavery

lead or safeguarding lead who is a single point of contact. Even if you have an external modern slavery lead that you report in to, it is still valuable to keep a good record internally. It is especially important that whoever it is, they are adequately trained and resourced to be able to support people fully.

You can use Tables 11, 12 and 13 to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> ! Tables 11, 12 and 13 corresponds to **Question 3** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	**Modern Slavery Lead** ■ You can identify one person who may hold responsibility for sharing modern slavery knowledge and expertise. They may be internal or external to the organisation. **Awareness** ■ Some, but not all staff, may have an idea of who this person is.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below and to the right to start working on identifying and training the modern slavery lead(s) in your organisation.
FURTHER RESOURCES	■ National Modern Slavery Coordinators Forum

Table 11: Developing classification table for Modern Slavery Leads

LEVEL OF CHANGE	ADVANCING
APPLICATION	**Modern Slavery Lead** ■ At least one person who has dedicated time to address sharing knowledge and expertise, answering enquiries and raising awareness of modern slavery. ■ This person may or may not be involved in dealing with grievances. They may be internal or external to the organisation. **Awareness** ■ Most staff members know who the point person is and regularly engage with them for their department. **Expertise** ■ This point person is provided with training and resources for this role.
SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to ensure you are in line with best practice when identifying and training the modern slavery lead(s) in your organisation.
FURTHER RESOURCES	■ London Modern Slavery Leads

Table 12: Advancing classification table for Modern Slavery Leads

LEVEL OF CHANGE	LEADING
APPLICATION	**Modern Slavery Team** ■ There is an internal team of more than one dedicated member of staff focusing solely on modern slavery or a lead per department. ■ You have stakeholders representing different functions (e.g. procurement, employment, subcontracting etc) within the organisation to help further embed modern slavery mitigation work. **Awareness** ■ All staff members know who the point person / team is and regularly engage with them. **Expertise** ■ This person / team is provided with the resources and training required for this role. ■ This person / team has received training on how modern slavery may impact all parts of the public sector body, and is well-equipped to direct enquiries to the right internal department if they do not know the answer themselves. ■ The training and resources provided to this person / team is regularly refreshed.
SCORECARD	If this sounds like your organisation, select **"Yes"** and continually ensure you are in line with emerging best practice when identifying and training the modern slavery lead(s) in your organisation

Table 13: Leading classification table for Modern Slavery Leads

4. Risk Assessments

A risk assessment is the overall process of identifying, analysing and evaluating potential risks which may arise in your organisation. Understanding where risk lies within your organisation's operations and supply chains is crucial in order to ensure that the modern slavery strategy properly addresses the particular risk factors involved.

Understanding that capacity and resource may limit your ability to work with all suppliers across your supply chain, conducting a thorough risk assessment would enable you to **spot high risk areas**, identify those suppliers with whom you have the greatest leverage and target responses accordingly.

Do not assume that risk does not exist. **Risk assessments should be refreshed** on a regular basis and should inform supplier engagement strategies (e.g. which suppliers to prioritise for further due diligence).

In terms of modern slavery risk, **some countries and industries are considered more high risk than others**. Where you have suppliers in these countries and industries, you may want to prioritise looking at those partnerships first. Expenditure is also an important factor when conducting risk assessments and should be considered when choosing which suppliers to prioritise for further due diligence. **The higher your expenditure, the more leverage you are likely to have to make change** if you do find high risk activities. A robust risk assessment takes into accounts these factors and outlines steps for mitigating them.

We recommend that risk assessment include at least all tier-one suppliers, with a realistic plan to extend this to lower tiers over time. Depending on the size of your supply chain, you may choose to segment suppliers into high, medium and low risk. A risk assessment can include, for example:

- **A full list of suppliers**
- **Country-level risk factors** (such as high prevalence of child labour, known corruption issues, high rates of labour abuses in that location - see full definition of modern slavery in **Annex 5** for examples of the range of labour abuses covered under the term).
- **Industry-level risk factors** (such as known issues with illegal subcontracting, lack of oversight of working conditions, high prevalence of low-paid migrant workers).
- **Analysis of the key risks** identified in the process.
- **Identification of a list of 'higher risk' suppliers for further due diligence**, or risk 'buckets' such as suppliers with a higher risk of child labour, migrant recruitment issues, illicit subcontracting, for example.

- **Complex supply chains** can facilitate modern slavery as the traceability of goods and the transparency of the work conditions they are produced in will be increasingly difficult to manage.

- Having knowledge on the **nature of a workforce** will help to identify high-risk groups. For example, migrant workers may be at an increased risk of exploitation, especially in work that may be seasonal or considered low skilled.

- **Recommendations for specific risk mitigation activities**, especially for the activities with high-risk sectors.

For local authorities, medium to high risk sectors can include construction, facilities management, the care sector, waste management, leisure, hospitality, textiles/clothing, IT/electronics, housing, manufacturing and agriculture (for more information on key risk areas, see **section 2.4** of this guide).

Note that risk assessments are only effective and relevant if they're **kept up to date**. It is likely that your organisation's operations are constantly changing or being updated. Any small changes to your organisation and/or your supplier's operations can affect the level of modern slavery risk posed to workers.

Importantly, the **product supply chain can extend across multiple countries and industries**, and can quickly become complex with multiple suppliers contributing to a finished product. There is substantial modern slavery risk across product supply chains, from raw material harvesting, to manufacturing, packaging, through to shipping. One way to ensure your suppliers are addressing modern slavery risks as thoroughly as you is to require that your policies are also utilised by your suppliers in relation to the goods they provide and, where possible, reaching beyond the first tier of suppliers.

Finally, to lead the way in improving modern slavery risk mitigation in your supply chains, it is good practice for you to pay attention to your **supply chain data management** too in order to be notice and analyse any patterns and risks quickly. For example, consider:

- **Consolidating suppliers:** Organising data by supplier rather than by purchase. This reduces the number of duplicate suppliers in procurement data and makes risk mapping more efficient.

- **Using unique identifiers:** In procurement data, make use of unique identifiers that are attached to suppliers to make the data more "searchable". Unique identifiers can be the supplier's company number, VAT number or a custom identifier of the local authorities choice if procurement is outside the UK for example.

- **Identifying what is being procured:** To more accurately address the supply chain risk a supplier poses, it is recommended that you add details to procurement data regarding what supplies are procured from a supplier. This adds more granularity especially when a supplier provides multiple products/services that may be unrelated to each other.

- **Identifying where supplies are procured from:** Further detail can be provided through identifying the product's supply chain itself. This may include identifying the locations of different factories where parts are manufactured, assembled etc., as opposed to only providing the head office's location. This is because some locations may have unique human rights risks which will not be captured in the risk assessment if only the head office address is given.

- **Thinking about data storage and exporting of information:** Ensure that data can be accessible and downloaded from the system with a variety of fields and variables included. This will make not only risk assessment more streamlined but management of the supply chain as a whole.

Once your risk assessment is complete, it is recommended that your organisation carefully review the outcome of the assessment and take action based on the result. This can include a **request to the supplier to address major concerns** via changes in working conditions, introducing trainings etc. Ideally, you will **have a condition in your contracts** with suppliers allowing you to enforce this. In some cases, taking action based on the result of the risk assessments may result in contracts being rescinded, in particular where grave offences have been uncovered. Generally, this is not a recommended practice as it often puts workers at further risk. Where you have leverage, it is better this is used to **ensure suppliers engage in corrective actions and ensure remedy**. Contract termination should only be used as a last resort, for example, if suppliers continue to be unresponsive or repeatedly engage in abuse.

You can use Tables 14, 15 and 16 below to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> **!** Tables 14, 15 and 16 correspond to **Question 4** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	**Risk Assessment** You have a general company-wide risk assessment, which includes modern slavery risks as part of it. **Tier of Suppliers** You have assessed the risks associated with some of your tier-one suppliers.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below and to the right to start working on your risk assessments.

FURTHER RESOURCES	**Software or Organisations to Support Risk Mapping:** ■ Sourcemap ■ STOP THE TRAFFIK Risk Mapping ■ TISC Report: Produce Your Supplier Dashboard ■ The Mekong Club: Modern Slavery Risk Map ■ UK Government: Risk prioritisation resource. A copy of this resource can be provided to public bodies on request. Email: MSCommercial@homeoffice.gov.uk

Table 14: Developing classification table for Risk Assessments.

| LEVEL OF CHANGE	ADVANCING
APPLICATION	**Risk Assessment** ■ You have completed and publically share a stand alone modern slavery risk assessment which considers at least the following: – Full list of suppliers – Country-level risk factors – Industry-level risk factors – Analysis of the key risks identified in the process – Where applicable, identification of a list of 'higher risk' suppliers for further due diligence, or risk 'buckets' – Recommendations for specific risk mitigation activities **Tier of Suppliers** ■ Your risk assessment addresses all of your tier-one suppliers alongside a plan to extend to lower tiers over time. **Frequency** ■ Your risk assessment is refreshed regularly.
SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your risk assessments in line with best practice.
FURTHER RESOURCES	**Resources for Understanding Risk** ■ Social Responsibility Alliance: Slavery and Trafficking Risk Template ■ Global Slavery Index ■ Trafficking in Persons Report ■ TISC Report: Custom Dashboards ■ Shiva Foundation's Stop Slavery Blueprint, pages 17-19 ■ SME Toolkit (pages 8-9) ■ Risk Screening Tool ■ Understanding Industry Risk ■ Modern Slavery Assessment Tool - Supplier Registration Service ■ US Government Responsible Sourcing Tool ■ Ethical Trading Initiative and Ergon Associates: Managing Risks Associate with Modern Slavery ■ Shift: Business Model Red Flags ■ Ethical Trading Initiative: Base Code ■ GLAA: Labour Exploitation Industry Profiles

Table 15: Advancing classification table for Risk Assessments.

LEVEL OF CHANGE	LEADING
APPLICATION	**Risk Assessment** ■ You have completed and shared a standalone modern slavery risk assessment which covers all of the areas highlighted in the Advancing table. **Tier and Type of Suppliers** ■ You have segmented your suppliers into high, medium and low risk. ■ You have identified which contracts are at high or medium risk of modern slavery based on industry type, complexity of supply chain, the nature of the workforce, context in which the supplier operates, type of commodity and supplier location. ■ Your risk assessment addresses all of your tier-one suppliers and in high risk areas, you have assessed at least a few suppliers in lower tiers. ■ Your risk assessment has informed other elements of modern slavery strategy (e.g. which suppliers to prioritise for further due diligence). ■ You are considering the components of products you buy in your risk assessment and taking action accordingly. ■ You have identified and are focussing on specific medium to high risk sectors: For example, for a local authority, this could be: – Construction – Facilities Management – Care Home Facilities – Waste management – Leisure – Hospitality – Textiles/clothing – IT/electronics – Housing – Manufacturing – Agriculture **Frequency** Your risk assessment is refreshed regularly and suppliers are aware of this. **Data Management** You have a robust system for supplier data management including: ■ Consolidating suppliers ■ Using unique identifiers ■ Identifying what is being procured ■ Identifying where supplies are procured from ■ Thinking about data storage and exporting of information
SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your risk assessment in line with emerging best practice.
FURTHER RESOURCES	Review Appendix 3 for access to Stop The Traffik's full redacted reports following a risk mapping exercise undertaken with two local authorities. For more information on Stop The Traffik's typologies, see here. ■ Home Office: A Typology of Modern Slavery Offenses in the UK ■ Local Government Association: Modern Slavery in Supply Chains ■ Local Government Association: Modern Slavery Procurement Guidance (Construction) ■ Stonger2gether: Tackling Modern Slavery in Construction ■ Gov.uk: Construction Industry Briefing ■ Gov.uk: Construction Industry Poster ■ Chartered Institute of Building: Construction and the Modern Slavery Act ■ FLEX: Modern Slavery in London's Construction Sector ■ Nottingham Rightslab: Report: Report on the vulnerability of care-workers in England to modern slavery risks during the COVID-19 pandemic ■ Nottingham Rightslab: Report: The vulnerability of paid migrant live-in care workers in London to modern slavery ■ Electronics Watch: Contracting for change web page

Table 16: Leading classification table for Risk Assessments.

5. Procurement Protocols and Supplier Engagement

Most organisations' supply chains extend beyond one tier of suppliers - whether that is product supply (goods) or labour supply (services). The further down the supply chain, the higher the risk and the less oversight your organisation has. It is therefore recommended that organisation's require suppliers to meet specific expectations when it comes to modern slavery.
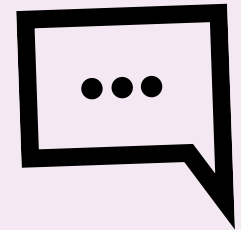
Assistant Director for Procurement and Contract Management

"The integrity and authenticity of those [modern slavery] statements erode the further down [the supply chain] you go…The accountability must go all the way back to the principal contractor, the main contractor, so it's a bit like the corporate responsibility piece. They can't just push it down the line saying it's nothing to do with us."

To begin with, it is acceptable to **start conversations about modern slavery with your suppliers informally**. If you have never broached the subject before, it can be scary and overwhelming for smaller suppliers. It is useful to ask suppliers about their own modern slavery statement or code of conduct first.

An even more robust approach would be to **formally incorporate your expectations in writing, ideally in your contract**. Writing clauses into your contracts as part of the procurement process can help to ensure that your suppliers commit to implementing the same modern slavery standards as you.

In order to have confidence that suppliers are meeting standards and expectations set by your organisation, **building modern slavery into all stages of the procurement process** is a useful step. This ensures accountability and encourages dialogue on this topic. It is recommended that modern slavery is incorporated into the tender (the Modern Slavery Self Assessment Tool (MSAT) provides a good way of conducting this due-diligence process during the tender stage), contract award, contract review and management processes. The more consistently and clearly you mention tackling modern slavery throughout the process, the more likely your suppliers will know you are serious about this requirement and try their best to comply.

Contracts and Procurement Officer

"You can have a statement that you've put forward but actually I think it's more than just having a statement. It's how we monitor it, which is really important, how we get our contract managers to understand the importance of their role in it."

Product Supply Chains

Importantly, product supply chains can extend across **multiple countries and industries**, and can quickly become complex with multiple suppliers contributing to a finished product. There is substantial modern slavery risk across product supply chains, from raw material harvesting, to manufacturing, packaging, through to shipping. One way to ensure your suppliers are addressing modern slavery risks as thoroughly as you is to **require that your own template policies** are also utilised by your suppliers in relation to the goods they provide and, where possible, **reaching beyond the first tier of suppliers**.

Labour Providers

Cohesion and Integration Manager

"There's also another aspect...which is obviously our own HR team and our internal recruitment because we do use agencies through HR. So again, part of the process there is ensuring that those individuals have the training and the knowledge and understanding of how it happens, why it happens."

Contract and Procurement Officer

"Something that would be quite helpful is to ask for a quarterly report on something relating to their workforce, especially in certain industries like construction and care, where we know that there could be risks around modern slavery."

Labour providers also play an important role in today's economy, particularly in sectors with fluctuating production levels, providing organisations with a cost-effective method for maintaining capacity. Unfortunately, using **subcontracted labour providers** also increases the risk of exploitation within your workforce since it **blurs oversight and accountability**, especially when labour providers outsource to other labour providers (for example, cleaning staff, security guards, refuse collectors that are employed through a third-party).

Risks associated with subcontracting labour can include agencies charging **recruitment fees, contract deception, wage deductions, long working hours for low payment and the use of excessive force**. However, there are simple, practical steps you can take to reduce the risk of modern slavery whilst still using labour providers:

- It is recommended that suppliers of such labour services are included in the **modern slavery strategy**.
- It is recommend that you mention supplier **auditing processes** in your modern slavery policies (see Section 3.6 of this guide for more information on auditing).

Where reasonable and proportionate, you can **coupled these obligations with further support** (e.g. through training or resources) to ensure that your prioritised suppliers are able to implement these standards effectively and monitor to ensure compliance within their own supply chains. As far as possible, **training should be made available in the suppliers' own language and should be specific to the country/ industry** that the supplier operates within.

Your **ability to deliver/recommend training to suppliers will be generally tied to the leverage you hold as a client** as well as the relationship you have with them. Taking advantage of 'meet the supplier' days and other such events may offer an opportunity to promote training and awareness raising. Some sectors will be classified as more high risk than others. By **tailoring training to specific sectors**, organisations can address specific modern slavery risks unique to each sector. Where local or national training is available, you can **signpost your suppliers** to the relevant resources accordingly.

It is not expected that every supplier throughout your supply chain will be reached within a year of beginning efforts - addressing modern slavery risk is an exercise in continuous improvement. Once you embed certain practices with your suppliers, best practice would include **conducting audits** to ensure your contractual requirements on modern slavery are being upheld. It is likely that your organisation's and your supplier's operations change over time. It is recommended that your contractual clauses and any other work you do with your suppliers in relation to modern slavery is monitored, **regularly reviewed and updated** as needed.

Finally, this framework can be read alongside the government's [Procurement Policy Note (PPN)](#) and is not intended to replace it. The PPN provides guidance on managing modern slavery risks in new and existing procurement contracts.

You can use Tables 17, 18 and 19 below to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> **!** Tables 17, 18 and 19 correspond to **Questions 5, 6 and 7** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	**Supplier Engagement** ■ You are in conversation with some of your product and labour suppliers (as identified in your risk assessment) about their approach to tackling modern slavery.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below to start working on your procurement protocol and supplier engagement processes.
FURTHER RESOURCES	■ UK Government: Tackling Modern Slavery in Government Supply Chains ■ Local Government Association: Guidance on Modern Slavery in Supply Chains ■ UK Government: Supplier Registration Service for Government. ■ UK Government: Modern Slavery Assessment Tool ■ CIPS: Protecting Human Rights in the Supply Chain ■ SME Toolkit (pages 10 -17 and 19)

Table 17 Developing classification table for Procurement Protocols and Supplier Engagement

LEVEL OF CHANGE	ADVANCING
APPLICATION	**Supplier Engagement** ■ Where reaosnable and proportionate, you require some of your Tier 1 suppliers (as identified in your risk assessment) to have a modern slavery commitments similar to your own. **Procurement Clauses** ■ Where reasonable and proportionate, you require your Tier 1 suppliers to commit to implementing standards as part of the tender and/or contracting process. OR ■ Where reasonable and proportionate, you require suppliers to sign up to a code of conduct or specific policy before conducting business with your organisation. **Training and Support** ■ Where reasonable and proportionate, you have built the knowledge of your Tier 1 suppliers (as identified in your risk assessment) on modern slavery standards and practices (e.g. through training, resources etc).
SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your procurement protocol and supplier engagement processes in line with best practice.

| FURTHER RESOURCES	See **Section 2.2** for resources on developing training. ■ UK Government: <u>Tackling Modern Slavery in PPE Supply Chains</u> ■ Verite: <u>Fair Hiring Toolkit</u> ■ Stop Slavery Network: <u>Recruitment Fees</u> ■ IHRB: <u>6 Steps to Responsible Recruitment</u> ■ SME <u>Toolkit</u>: Section 4 (pp.13) ■ Shiva Foundation's <u>Stop Slavery Blueprint,</u> pages 32-35 ■ <u>Association of Labour Providers</u> ■ Stronger Together: <u>Responsible Recruitment Policy</u> ■ <u>Tackling Modern Slavery in Business: Employer Implementation Checklist</u> ■ <u>BSI Standard for Organisational Responses to Modern Slavery</u>

Table 18: Advancing classification table for Procurement Protocols and Supplier Engagement.

LEVEL OF CHANGE	LEADING

APPLICATION	**Supplier Engagement**
	■ Where reasonable and proportionate, you require all of your Tier 1 suppliers (as identified in your risk assessment) to have a modern slavery statement and policies with standards consistent to those outlined in your statement.
	■ Some of your Tier 1 suppliers have committed to upholding the same standards with their own suppliers.
	
	Procurement Clauses
	■ Where reasonable and proportionate, you require all of your Tier 1 suppliers (as identified in your risk assessment) to commit to upholding standards as a fundamental condition of the tender and/or contracting process. This may include:
	  – Making a clear statement of expectation.
	  – Including basic questions on modern slavery during supplier due diligence.
	  – Including a declaration for suppliers to comply with modern slavery policies and applicable laws.
	  – Including a termination clause in event of non-compliance.
	  – Requesting publication of statutory Modern Slavery statements.
	■ This is captured in writing through legally enforceable documentation.
	
	Training and Support
	■ Where reasonable and proportionate, you have built the knowledge of your Tier 1 suppliers (as identified in your risk assessment) on modern slavery standards and practices. Any training or resources are delivered in their own language and specific to both the country and industry of the supplier.
	This includes testing and updating knowledge on a regular basis.
	
	Audit
	■ You conduct audits of your suppliers (as identified in your risk assessment) to ensure they are adhering to their commitments.

SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your procurement protocol and supplier engagement processes in line with emerging best practice.
FURTHER RESOURCES	See **Appendix 6** for template wording of how modern slavery can be incorporated into the tender and/or contracting process. See **Section 2.6** for more information on audits. ■ <u>Government guidance on Tackling Modern Slavery in Government Supply Chain</u>, Annex A ■ Olga Martin-Ortega and Andy Davies: <u>Modern Slavery Statement Checker</u>

Table 19: Leading classification table for Procurement Protocols and Supplier Engagement.

6. Audit Protocols

Auditing is the formal process of reviewing an organisation's compliance with the procedures, code of conduct and policies they have set out in relation to their social and environmental responsibilities.
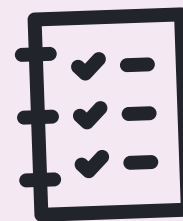
As part of this process, organisations may also audit their suppliers to ensure their supplier's practices are consistent with their organisation's modern slavery objectives.

Auditing is a key tool in order to assess the working conditions and assess suppliers' capabilities to protect against modern slavery. Where resources are available, it is recommended that your organisation establishes **a clear audit programme to assess suppliers**, particularly those of higher modern slavery risk, on a regular basis. This can be managed internally, or the organisation may choose to engage third-party audit providers, such as SEDEX or Intertek. Ideally, the **supplier's staff should be engaged as part of this process** and given the opportunity to provide feedback on their conditions in a safe way.

There are a variety of approaches that organisations can use when auditing their suppliers, such as **questionnaires, management interviews, scheduled site visits, surprise site visits and worker interviews**. While audits do have their limitations (they usually only provide a snapshot of the current working conditions at the time of the audit), a robustly executed audit will utilise a range of tools to ensure an effective audit approach. It is recommended that organisations make use of as many tools as is appropriate to ensure audit results are as reliable as possible.

Furthermore, audit results **should be incorporated into the ongoing supplier risk assessment and due diligence processes**. It is important for **audit results to inform further engagement** with the supplier through improvement plans (where you have found them lacking or disengaging).

Finally, it is vital to regularly audit suppliers, not only to ensure compliance with standards at the time of the audit, but to decrease non-compliance over time whilst building effective communication lines. **The frequency of supplier audits generally vary by industry**. Higher-risk industries should be audited more frequently than lower-risk industries, however it is recommended that suppliers be audited every 2 years at least, as a general rule of thumb.

"If we ask the supplier to provide a modern slavery statements…that's reviewed on a six monthly basis. Then, in addition, [we were] training the staff and putting in an effective plan. The IT systems will prompt us when we need to touch base with those suppliers to regain the evidence and have those conversations. "

Head of Category

You can use Tables 20, 21 and 22 below to assess how well you are doing in this key thematic action area and find ways to improve your approach.

! Tables 20, 21 and 22 correspond to **Questions 8** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	▪ You have a general audit process in place to inspect your suppliers which mentions social and labour issues.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below and to the right to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below to start working on your audit protocols.
FURTHER RESOURCES	▪ You have an extensive audit process which includes specific questions on modern slavery issues. ▪ You have a mechanism in place to measure compliance with the conditions set out in the tender and contracting stage.

Table 20: Developing classification table for Audit Protocols.

| LEVEL OF CHANGE	ADVANCING
APPLICATION	▪ You have an extensive audit process which includes specific questions on modern slavery issues. ▪ You have a mechanism in place to measure compliance with the conditions set out in the tender and contracting stage. ▪ You provide an opportunity to provide feedback on their conditions in a safe way.
SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your audit protocols in line with best practice.
FURTHER RESOURCES	▪ Questions to Ask During an Audit to Identify Labour Violations ▪ LexisNexis: Auditing suppliers - modern slavery and human trafficking ▪ Ulula ▪ Just Good Work

Table 21: Advancing classification table for Audit Protocols.

LEVEL OF CHANGE	LEADING

APPLICATION	■ You have an extensive audit process which includes a specific questions on and inspection into modern slavery issues.
	■ You have a functioning mechanism in place to measure compliance with the conditions set out in the tender and contracting stage and your modern slavery standards.
	■ You engage your employees in part of the auditing process and provide them with an opportunity to feedback on their conditions in a safe way.
	■ Your audit process complies with international standards and in relation to modern slavery, your audit:
	  – Addresses underlying problems (such as fear of appraisal, language barriers and lack of worker engagement) in your methodology in order to ensure your audit is adequately completed and not just a tick-box exercise.
	  – Aims to work with suppliers on a more equitable basis.
	  – Aims to engage subcontracted labour in part of the auditing process.
	■ You have begun to audit / are considering auditing suppliers at lower tiers.
	■ Audit results have been or will be incorporated into the ongoing risk assessment and due diligence processes.

SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your audit protocols in line with emerging best practice.
FURTHER RESOURCES	The following third-party audit providers have social specialisms, are internationally accredited, and may be engaged to support with this process: ■ SGS ■ SEDEX ■ Intertek

Table 22: Leading classification table for Audit Protocols.

7. Reporting and Remediation Protocols

Modern slavery covers a range of offences (see Annex 5 for examples of various forms of exploitation) and can be part of an organised crime. Your staff should not disclose any information beyond the avenues for reporting in case they expose themselves and/or the victim(s) to harm.
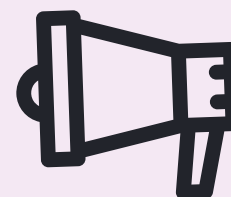
To ensure that both potential victims and employees are safeguarded, all employees within the organisation (regardless of their migration status) should have the ability to raise red flags and possible concerns related to modern slavery, in a safe, secure and accessible way. This can lead to the quick and early detection of possible issues as they arise.

Hate Crime and Modern Slavery Officer

"Our whistleblowing policy is accessible to everyone. There's also a mandatory training session on it which includes who to raise a grievance with, or who to make a report to. In terms of the way that works, you'd make a report and then depending on the nature of the report, it would either go to the police or it could be an internal investigation."

Reporting Protocol

To ensure effective reporting it is recommended that organisations:

- **Set up an anonymous internal hotline**/email address/ point-person and ensure that all staff are aware of the channels available to them.

- **Keep data on the number of reports made**, to ensure that all are adequately responded to, as well as to track trends over time.

- Ensure there is a **process in place to manage and respond to reports** as they arise, to ensure issues are quickly responded to.

- All of this information is featured within staff training and analysed by the modern slavery lead for **adapting and improving internal processes**.

This reporting pathway could extend beyond modern slavery and include any grievance (for example, bullying, harassment or wider labour abuses) to avoid creating multiple reporting avenues at your organisation.

Subcontracted labour should also be able to report any issues related to their labour, in their own language, without fear of reprisal, and with confidence that issues will be addressed quickly. While there may be a limit to what your organisation can enforce with your suppliers, it is important to encourage them to also provide access to **adequate grievance mechanisms**, such as those outlined above, within their own organisations. This expectation can be outlined within your policies/codes of conduct/tendering/ contracting process. It is becoming increasingly expected that workers have access to such a mechanism in most industries.

These mechanisms are crucial as often workers are not otherwise engaged or given a means to speak up when needed. There are a range of **worker voice mechanisms** available, from hotlines to smartphone apps. These can be managed internally by your suppliers or can be outsourced to a grievance mechanism specialist service. All grievance mechanisms must be coupled with a procedure in the instance that a possible modern slavery case arises, to ensure victims are protected and root causes of the issue are addressed.

Remediation Protocols

After an incident has been reported, remediation protocols are the processes an organisation takes in response to the occurence. Organisations and suppliers must move quickly and with care if a possible modern slavery incident is uncovered. These processes should ensure that **victim wellbeing** is central, include **engagement with key stakeholders, as well as relevant escalation to law enforcement and civil society partners** where necessary. It is recommended to **keep data** from any cases that are uncovered in order to follow up on the process, ensure victims are protected, and **capture lessons** learned to protect against similar future occurrences. Some examples of remediation activity include:

- **Repayment of recruitment fees** and costs related to workers, in the case that excessive or illegal fees have been paid. This is otherwise known as the Employer Pays Principle.
- **Reissuing contracts** in the employee's native language with amended clauses, in the case where contract deception has taken place.
- **Repayment of wages** that have been unfairly deducted.
- **Reissuing of identification documents**, where documents have been ceased or withheld.
- **Provision of alternative accommodation** or supported to access alternative accommodation, in the case that their existing accomodation is unsafe or unreasonably priced.

A best-practice approach to remediation will **always put the victim's well-being as the first priority**. It is recommended to engage with specialist local charities to support the process, as they will have experience and support services to assist with this. Examples of such charities include: Hope for Justice, Hestia, ATLEU, Unseen, Medaille Trust, the Helen Bamber

Foundation, The Salvation Army. Where possible, **the underlying cause** of the issue should be identified and addressed to avoid future repeats. As much as possible the relationship with the supplier should be maintained (so long as there is willingness to fix the issue) in order to build a better future, as opposed to immediate termination of the contract.

Due to the hidden nature of the crime, most cases of modern slavery remain undetected. Although modern slavery, when identified, is never a positive experience, having discovered cases means that your organisation has processes in place to check for the offence.

You can use Tables 23, 24 and 25 correspond to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> **!** Tables 23, 24 and 25 correspond to **Questions 9, 10 and 11** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	**Reporting** ■ You have at least one reporting pathway where your staff can report modern slavery concerns or you have shared details of the Modern Slavery Helpline. ■ Your staff can report concerns in a safe and secure manner. **Remediation Protocol** ■ In the instance that modern slavery is discovered, you have a process in place to address this. This process may form part of your wider whistleblowing policy.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select **"No"** or **"Don't Know"** for this question and check out the resources below to start working on your reporting and remediation protocols.
FURTHER RESOURCES	The UK Modern Slavery Helpline is an externally managed resource that can support with modern slavery concerns: UK Modern Slavery Helpline. Other organisations that can support: ■ The Salvation Army ■ Hope for Justice ■ Gangmasters Labour Abuse Authority ■ Stop the Traffik ■ Hestia

Table 23: Developing classification table for Reporting and Remediation

LEVEL OF CHANGE	ADVANCING

APPLICATION	**Reporting**
	■ You have a policy which explicitly details the reporting pathways that can be used by your staff. This policy outlines what should be done in the instance that a modern slavery concern is raised.
	■ Your staff can report concerns in a safe and secure manner.
	■ This policy has been shared with all staff and is regularly updated through posters, ongoing training etc.
	■ You have a process to address, resolve and report back on concerns.
	■ Some cases have been reported already.
	
	Remediation Protocol
	■ In the instance that modern slavery is discovered, you have a robust process in place to address this. This includes the following key steps:
	  – **Investigation** - beyond the initial report, this should be performed by local police and victim service providers by local police services.
	  – **Victim services** - If an investigation confirms probable incidents of slavery, you should work in cooperation with a local specialist victim service provider to ensure that the victim is protected and aware of all options for access to remedy (judicial and non-judicial)
	  – **Root cause analysis** - A root cause analysis for the incident can help determine why the incident involved the business,a supplier or employees.

SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your reporting and remediation protocols in line with best practice.
FURTHER RESOURCES	For overseas suppliers, it may be necessary to engage with a specialist grievance provider: ■ Labour Solutions ■ Ulula ■ Just Good Work ■ KnoGlobal For more information on a cooperative approach wirth suppliers: ■ SME Toolkit (page 18) The following templates can support with this: ■ Shiva Foundation's Stop Slavery Blueprint, (page 15)

Table 24: Advancing classification table for Reporting and Remediation

LEVEL OF CHANGE	LEADING
APPLICATION	**Reporting** ■ You have a policy which explicitly details the reporting pathways that can be used by your staff and subcontracted workers. This policy outlines what should be done in the instance that a modern slavery concern is raised. ■ Both your staff and subcontracted labour can report concerns in a safe and secure manner and in their own language. ■ This policy has been shared with all employees and subcontracted workers and is regularly updated through posters, ongoing training etc. ■ You have a robust process to address, resolve and report back on concerns in a timely manner. ■ You keep accurate records of all reports made and track these reports over time. ■ All above features, including the number of concerns addressed, are included in ongoing staff training. ■ You have implemented clauses in your Tier 1 supplier contracts that require suppliers to have reporting and remediation protocols in place. ■ You may have started to consider how reporting and remediation is handled in lower tiers of your supply chain. **Remediation Protocol** ■ In the instance that modern slavery is discovered, you have a sophisticated victim-centric process in place to address this, which places the victim's wellbeing above everything else. See achieving table for details of what should be included in the remediation protocol. ■ You have everything that is outlined in the 'Advancing' table in place. ■ You have working relationships with local law enforcement and specialist charities to ensure escalation is as smooth as possible and adequate support is provided. ■ One of the main focuses of your investigation is identifying and tackling the underlying cause. ■ If the instance is discovered in your supply chain, you take a cooperative approach as opposed to immediate termination of the contract. You commit to working with your supply to ensure the concern is promptly and adequately dealt with and support them to put procedures to prevent this from reoccurring.
SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your reporting and remediation protocols in line with emerging best practice.
FURTHER RESOURCES	More guidance on developing an effective remediation strategy can be found here: ■ IOM: Remediation of Migrant worker Grievances ■ Ethical Trading Initiative: Practical Guidance for Business ■ Consumer Goods Forum: Guidance on the Priority Industry Principles ■ IHRB: Remediation Worker-Paid Recruitment Fees

Table 25: Leading classification table for Reporting and Remediation

8. Wider Modern Slavery Collaboration

Wider modern slavery collaboration is where various public sector, business and community organisations come together to collectively focus their expertise and resources on modern slavery in the community they serve. These cross-sector collaborations, sometimes called partnerships, committees or working groups can be locally, nationally or internationally focused.

Modern Slavery Coordinator

"I set up a working group at the beginning of last year, made up of local authority modern slavery leads from the seven local authority areas. This was, firstly, for mutual and peer support because the role is often quite an isolated one and, secondly, to share common challenges and then best practice...It helped the Police and Crime Commissioner office develop a scoping exercise for all seven local authority areas that scoped all of their modern slavery policies and processes and training... It revealed the same problems across all seven local authority areas, which we can now work to address."

There are numerous **global and regional forums** related to modern slavery action that the organisation can participate in. This allows for the sharing of information, resources, and overall progression of the industry against modern slavery issues. In the absence of initiatives that the organisation can join, there are also opportunities to reach out to peers for collaboration and knowledge-sharing. These are often called modern slavery working groups / partnerships / networks. Sometimes they are even set up as multi-agency partnerships.

Charities and other civil society organisations hold a wealth of information on modern slavery issues and are criucial partners in helping to shape anti-slavery strategies. Your organisation should work to build relationships with charities and civil society organisations that specialise on tackling modern slavery. For example, Electronic Watch, monitors global electronics supply chains at all tiers to tackle labour abuses all over the world. It is recommended that you plug into similar relevant networks and organisations who have the resources and expertise to support your organisation's efforts and achieve a greater impact than you can do alone.

In addition to charities, your local authority should be working laterally with **other public sector bodies** in your region too. These may include, but are not limited to: police / law enforcement, housing / social care, local authorities, housing providers / housing

associations, job centres, educational institutions / organisations and your local Police and Crime Commissioner.

You can use Tables 26, 27 and 28 below to assess how well you are doing in this key thematic action area and find ways to improve your approach.

> **!** Tables 26, 27 and 28 correspond to **Question 12** in the Self-Assessment Scorecard.

LEVEL OF CHANGE	DEVELOPING
APPLICATION	■ You have engaged on a one-off basis with other public sector bodies who are doing similar work to learn from each other's approaches.
SCORECARD	If this sounds like your organisation, select **"Partially"** for this question and check out the resources below to build on your work so far. If you are not yet there, don't worry! Select "No" or "Don't Know" for this question and check out the resources below to start working on your wider modern slavery collaboration practices.
FURTHER RESOURCES	**Charities** ■ Hestia ■ Justice and Care ■ Medaille Trust ■ The Salvation Army ■ The Snowdrop Project ■ Ella's ■ ATLEU ■ The Helen Bamber Foundation ■ Sophie Hayes Foundation ■ The Clewer Initiative ■ ECPAT UK ■ Kalayaan

Table 26: Developing classification table for Wider Modern Slavery Collaboration

LEVEL OF CHANGE	ADVANCING
APPLICATION	■ You have joined a few meetings of local or regional groups (e.g. serious and organised crime, community safeguarding) where modern slavery may be included in the agenda. – You may have engaged with local specialist charities and local police when a modern slavery grievance has occurred (for example, refugee and asylum seeker groups).
SCORECARD	If this sounds like your organisation, select **"Mostly"** for this question and check out the resources below to bring your wider modern slavery collaboration practices in line with best practice.

FURTHER RESOURCES	**About Partnerships** ■ Anti-Slavery Partnership Toolkit. ■ Local Modern Slavery Partnerships ■ Collaborating for freedom: anti-slavery partnerships in the UK ■ Partnerships for freedom: Improving multi-agency collaboration on modern slavery **Existing Partnerships** ■ Nottingham's RightsLab Map multi-agency anti-slavery partnerships ■ The National Advisory Forum ■ London Working Group ■ NNCF — Human Trafficking Foundation ■ LMSLN - Human Trafficking Foundation ■ Hertfordshire Modern Slavery Partnership ■ Gloucestershire Anti Slavery Partnership ■ Norfolk Anti-Slavery Network ■ Modern Slavery Partnership - Hampshire Police and Crime Commissioner ■ West Midlands Anti Slavery Network ■ Humber Modern Slavery Partnership ■ Modern Slavery	Police and Crime Commissioner for West Yorkshire	WYPCC ■ Wales Anti-Slavery Leadership Group ■ South Yorkshire Modern Slavery Partnership ■ Safer Cumbria Modern Slavery Partnership ■ The Pan Lancashire Anti-Slavery Partnership ■ York Modern Slavery and Human Trafficking ■ BASNET - AFRUCA

Table 27: Advancing classification table for Wider Modern Slavery Collaboration.

LEVEL OF CHANGE	LEADING
APPLICATION	■ You consistently join and actively contribute to local or regional groups where modern slavery would often form part of the agenda. ■ You have joined an anti-slavery partnership group, attending meetings and participating in activities. ■ You have a joint-approach to tackling modern slavery in your organisation which includes, local law enforcement and specialist charities. ■ You are aware of national modern slavery forums and regularly follow, and engage with, their work.
SCORECARD	If this sounds like your organisation, select **"Yes"** and continue to update your wider modern slavery collaboration practices in line with emerging best practice.
FURTHER RESOURCES	**Global Networks** ■ U.N. Modern Slavery Working Group ■ Commonwealth 8.7 Network ■ Global Fund to End Modern Slavery

Table 28: Leading classification table for Wider Modern Slavery Collaboration.

9. Action Planning and Next Steps

Based on the results of your completed Scorecard, which should have been emailed to you on completion, along with this supporting guidance, you should now be able to develop an action plan around key priorities for improvement in your approach to tackling modern slavery.

DEVELOPING

Organisations who scored between 0 and 175 are currently in the developing stage. This means that your organisation is likely at the very beginning of your journey. You might have held discussions and forums, put together action plans and started gathering resources. You may have identified that this is a focus area for development for your organisation. You likely require education, learning and development in more or all thematic action areas to effectively manage risks. You should continue to explore the yellow and green tables in **Section 2** for ideas on how to build on the foundations you have already laid.

ADVANCING

Organisations who scored between 176 and 300 are currently in the advancing stage. This means that your organisation has probably been on this journey for a while. You might have tailored resources for your organisation and begun the process of implementation. You may have also started evaluating your approach to test its effectiveness. You have some evidence of progress but further improvement is needed. You likely require education, learning and development in some of the thematic action areas to effectively manage risks. Explore the green tables in **Section 2** of the supporting guidance for ideas on how to improve on what you are already doing.

LEADING

Organisations who scored between 301 and 400 are currently in the leading stage. This means that you are currently implementing most best practice approaches in your organisation. You have identified all your risk areas, put frameworks in place to effectively mitigate risks and regularly evaluate and improve your systems. Tackling modern slavery risk is a key strength in your organisation and you have good evidence of impact and/or enforcement. You are effectively managing risks in this area and should continue to do so.

Using this tool, you should be able to identify what is not working well, where improvements need to be made and develop a plan to address these. We encourage you to share these results with your colleagues and come up with next steps together in preparation for further legislation which will bring your organisation under requirement to report on modern slavery.

> We hope this tool has been useful and you feel empowered to take the necessary steps towards best practice. If you have any questions concerning the contents of this self-assessment tool and guide or would like to provide any feedback, kindly reach out to reach out to Shiva Foundation at info@shivafoundation.org.uk.

Section 3:
Annexes

Annex 1: Local authority case studies

STOP THE TRAFFIK has refined its risk mapping methodology, conducting reviews for many FTSE 100 companies. They have applied this methodology to risk map the supply chain of a London Borough Council and a County Council to help them address any modern slavery risks in their supply chains. The aim of these profiles is to support the building of modern slavery awareness into existing policies and activities within local authorities across the U.K. This inherent risk mapping report provided both councils with bespoke insight and recommendations for risk mitigation in its supply chain and the findings helped to inform the content within the self-assessment tool.

The risk mapping process is an effective tool for helping organisations to understand the human rights risk in their supply chain, targeting and prioritising mitigation activities, and ensuring transparent external reporting. STOP THE TRAFFIK has also provided a companion report; explaining how exploitation operates in each of their highest risk sectors, and specific recommendations for adapting their procurement procedures to ensure best practice modern slavery mitigation.

Suppliers with an annual expenditure of under £10,000 and £30,000 were excluded from the analysis of the London Borough Council and County Council's supply chains respectively. This was done to ensure the risk mapping process had an achievable scope of work but also to recognise a meaningful materiality threshold. Suppliers are unlikely to respond to calls for greater transparency or changes in policy and procedure from the Council if their business is not financially crucial to their operations. Analysis also focuses solely on external expenditure on third parties in the first tier of the supply chain, meaning that further analysis would be needed to assess the risk beyond tier one of supply chains.

1.1 Methodology

STOP THE TRAFFIK's modern slavery risk mapping methodology ranks all suppliers by their country of operation and their industrial sector. Suppliers are ranked on a scale of 1 to 5 - with 1 indicating low risk and 5 indicating high risk. When combining the country and sector risk of a supplier, a weakest link matrix is used to ensure that suppliers in a high-risk sector are not incorrectly classified as 'moderate risk', due to operating in a low-risk country, or vice versa.

The only exception to this is when a supplier is identified as having both a sector risk of 4 and a country risk of 4, in which case the total risk score becomes 5. The rationale for this is that in moderate high-risk countries, economic activity is typically more labour intensive rather than automated, thereby significantly increasing the risk of modern slavery occurring. To capture this specific risk, STOP THE TRAFFIK classifies all suppliers with a sector and

country risk level of 4 to a total risk level of 5. A diagram of this methodology can be seen below:

	1 - Low Risk
	2 - Moderate Low Risk
	3 - Moderate Risk
	4 - Moderate High Risk
	5 - High Risk

	Sector Risk 1	Sector Risk 2	Sector Risk 3	Sector Risk 4	Sector Risk 5
Country Risk 5					
Country Risk 4					
Country Risk 3					
Country Risk 2					
Country Risk 1					

This methodology measures what can be understood as a supplier's inherent risk, based on its country and sector:

- **Country Risk:** For country risk, factors such as national law, peace and stability, and rights of individuals will affect its risk level

  Example variables: Employment rights, civil liberties, corruption, and rule of law.

- **Sector Risk:** For sector risk, factors like the prevalence of subcontracting or reliance on manual labour impact a sector's risk.

  Example variables: Sector employment of low-skilled or manual labourers.

The risk mapping exercise helps to prioritise which suppliers or sectors to evaluate in more detail for an **actual risk mapping**. Actual risk mapping is the next logical step after an inherent risk mapping, involving assessments of items like policies and audits. Please contact business@stopthetraffik.org for more information.

1.2 Key findings

In common with other local authorities, the risk mapping process has highlighted high spend in **construction, residential care, and facilities management** (including cleaning and landscaping), three sectors which are at high risk of harbouring labour exploitation.

Activity	London Borough Council	County Council
Suppliers Analysed	300 (Tier 1)	1100 (Tier 1)
Supplier Data Provided	Supplier name, address, the annual procurement spends, and where available, classification of the products or services provided.	Creditor reference number, supplier name, company number, VAT number, address, annual procurement spend, and classification of the supplier's sector of operations.
Most High-Risk Sectors	Construction (SR:5) Facilities Management (SR:4) Waste services (SR:4)	Construction (SR:5) Service to landscape and building (SR:5) Civil Engineering (SR:5)
High Risk Sector (Total Council Spend Percentage)	27%	13%
High Risk Suppliers for Modern Slavery Identified	55 (Tier 1)	80 (Tier 1)
High Risk Suppliers (Total Council Spend Percentage)	19%	7%

Table 29: Summary of the Council's Supplier Analysis.

1.3 London Borough Council Profile

STOP THE TRAFFIK received data about this Council's top 300 suppliers by size of spend including the supplier's name, address, annual procurement spends, and where available, the classification of the products or services provided, as assigned by the Council.

Based on the analysis of these suppliers, the Council's spend was distributed across the different risk categories in the following proportions, found in Figure 1.
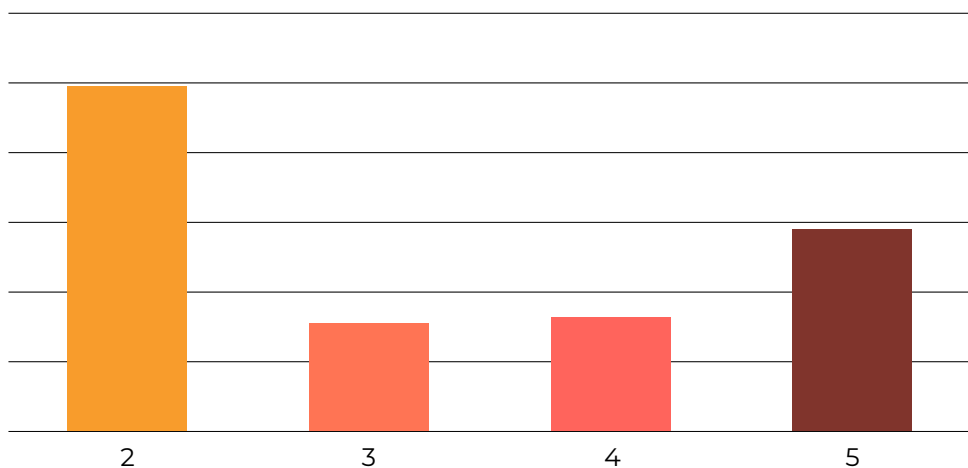
Figure 1: London Borough Council's spend by total risk (low to high).

Sectors	Sector Risk
Construction of residential and non-residential buildings	5
Activities of employment placement agencies	2
Treatment and disposal of non-hazardous waste	4
Development of building projects	3
Plumbing, heat and air-conditioning installation	4
Social work activities without accommodation for the elderly and disabled	2
Electrical installation	4
Other social work activities without accommodation n.e.c. (not elsewhere classified)	1
Residential care activities for the elderly and disabled	3
Construction of roads and motorways	5

Table 30: London Borough Council's top ten sectors by sector risk.

The council has high risk spend in only a few suppliers, meaning that they can address risk efficiently without having to engage many suppliers. Addressing the risk of all 55 suppliers in level 5 would be a good long-term goal. This is demonstrated in figure 2 below:
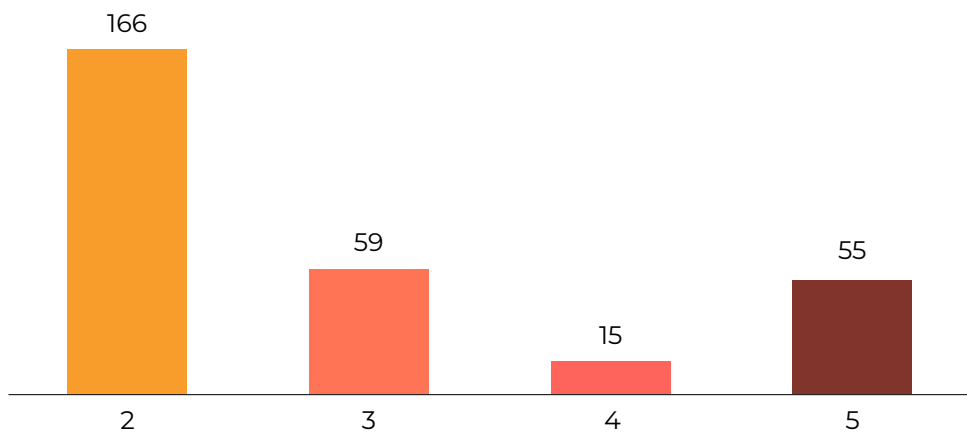
Figure 2: London Borough Council's supplier count by total risk (low to high).

As shown in table 31 below, these 8 high risk consolidated sectors would be a good medium-term goal for prioritising due diligence measures, as they contribute to most of the high risk spend while only consisting of 19% (55) of suppliers. They account also for 27% (£146 million) of the £552 million total procurement spend.

High Risk Consolidated Sectors
Accommodation
Civil engineering
Construction of buildings
Forestry and logging
Security and investigation activities
Services to buildings and landscape activities
Specialised construction activities
Waste collection, treatment and disposal activities; materials recovery

Table 31: Eight consolidated sectors contributing the most to the London Borough Council's high-risk spend

Initial Next Steps for the London Borough Council

As a short-term goal, the Council should focus on the top three high risk sectors: Construction of buildings, Civil engineering, and Services to buildings and landscape activities (Facilities Management).

By prioritising these sectors in modern slavery due diligence, the Council can address the majority of its high-risk spend with a targeted approach. While the care sector is only classed as risk level three (3) by the methodology, this approach should also be applied to it because of its significant portion of spend and recent reports of abuse in the sector. Deep dives into the construction and care sectors can be found accompanying this summary. These describe why these sectors are considered high risk and outline the common forms of exploitation to support risk mitigation.

In many cases, the first steps of risk mitigation can be achieved through changes in internal procurement policies and using tools such as self-assessment forms. These can lead toward:

- Better supplier engagement
- The development of effective grievance and remediation mechanisms
- Further policy reviews
- Development of training for suppliers and their staff

All this would result in impactful changes within the supply chain. To be effective across all high risk sectors of the supply chain, a larger investment of resources into all the above would be required. Again, targeting these efforts to achieve the largest possible impact over the shortest time and at minimum cost will be key.

1.4 County Council Profile

STOP THE TRAFFIK received data from the County Council's top 1100 suppliers by size of spend. Based on the analysis of these suppliers, it was found that the County Council's spend was distributed as follows:
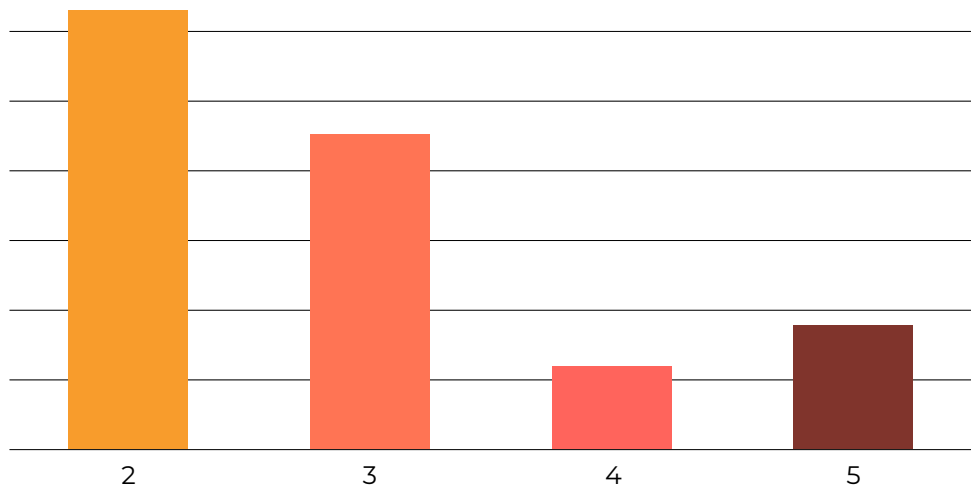

Figure 3: The County Council's spend by total risk (low to high).

Sector	Sector Risk
Residential care activities for the elderly and disabled	3
Social work activities without accommodation for the elderly and disabled	2
Pension funding	1
Treatment and disposal of non-hazardous waste	4
Residential care activities for learning disabilities, mental health and substance abuse	3
Other social work activities without accommodation n.e.c.	1
Construction of residential and non-residential buildings	5
Other human health activities	2
Other residential care activities	3
Hospital activities	3

Table 32: The County Council's top ten sectors by sector risk.

The County Council high-risk spend accounts for 13% of total spend, but only 7% of suppliers.

This means that the County Council can prioritise mitigation and ensure high risk spend is addressed whilst focusing mitigation efforts on a small number of suppliers. This disparity between the amount of high and low risk suppliers is demonstrated in figure 4:
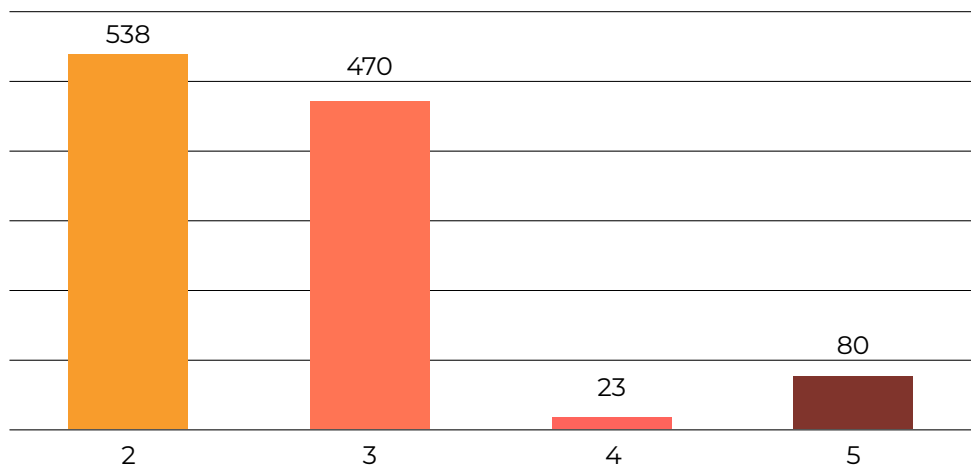
Figure 4: The County Council's supplier count by total risk (low to high)

Sector consolidation helps to keep responses effective and tailored, best utilising limited resources available at local authorities. Given the variety in concentration of suppliers across sectors, some areas can be classed as 'quick wins' as they account for a lot of high risk spend but have a small number of suppliers.

High Risk Consolidated Sector
Accommodation
Civil engineering
Construction of buildings
Employment activities
Manufacture of food products
Services to buildings and landscape activities
Specialised construction activities
Waste collection, treatment and disposal activities; materials recovery

Table 33: Eight consolidated sectors contributing the most to the County Council's high-risk spend

Initial Next Steps for the County Council

Civil engineering, Construction of buildings, and Services to buildings and landscaping suppliers account for 80% of high risk spend, but only 4% of total supplier count. These sectors should be prioritised for modern slavery due diligence to address most of the County Council's high-risk spend in a targeted manner.

STOP THE TRAFFIK also recommends focusing on the residential care sector due to its prevalence within the supply chain and recent reports of abuse in the sector. An additional report has been provided for this sector, outlining its risks and recommendations for risk mitigation.

Annex 2: Research methodology

Shiva Foundation worked collaboratively with The Mekong Club, STOP THE TRAFFIK and a number of procurement and modern slavery professionals across public bodies to design this self-assessment tool and guide.

The Mekong Club has developed experience mobilising businesses to implement modern slavery practices over a number of years. This scorecard is modelled after a baseline assessment tool The Mekong Club was created with their membership. The baseline assessment which serves as both a tool for any business to understand where their current practices sit within the larger anti-slavery picture, but also to help them understand what more can be done.

STOP THE TRAFFIK is a trusted and leading prevention actor both in the UK and globally, having operated solely in prevention for the last 16 years. Stop The Traffik's risk mapping methodology combines open-source human rights datasets with Stop The Traffik's Research and Intelligence trafficking database, in order to enable businesses to understand their exposure to modern slavery. To date, Stop The Traffik has mapped over 50,000 suppliers across all sectors including hospitality, construction, food and beverage, healthcare, support services etc. Stop The Traffik has also pioneered work with multiple local authorities over many years to combat modern slavery including East Sussex, Kent and Essex, the Royal Borough of Kensington and Chelsea, Westminster, Hammersmith and Manchester.

Shiva Foundation has been working specifically with hospitality organisations and small-medium enterprises to develop their anti-slavery policies and practices at a practical level. They have supported businesses with their own modern slavery statements. Through their role coordinating the Hertfordshire Modern Slavery Partnership, they have also fed into a number of relevant local level policies (e.g. the creation of multiple modern slavery statements, recruitment policies, supplier codes of conduct and the embedding of modern slavery in licensing policies).

The self-assessment tool, which is modelled on a business tool developed by The Mekong Club, has been designed for public sector bodies looking to report under the MSA. Shiva Foundation and The Mekong Club examined and drew upon over 17 years of collective knowledge in tackling modern slavery, as well as a number of existing resources in the creation of this tool, including:

- 103 of the 168 statements published on the Local Government website,
- Guidance on Section 54 (1) Transparency in Supply Chains modern slavery case studies
- The Ethical Trading Initiative's Modern Slavery Statements framework for Evaluation.

STOP THE TRAFFIK utilised their pre-existing business risk mapping methodology to undertake a risk-mapping exercise with two local authorities, a London Borough Council and a County Council. The exercise involved reviewing their supplier lists, annual spend and STOP THE TRAFFIK's datasets to understand their exposure to modern slavery (see **Annex 1** for the broken down local authority profiles). Through this analysis, STOP THE TRAFFIK were able to identify several medium to high risk priority areas across both local authorities. This included departments such as facilities management, construction, and the care sector. The findings informed the questions in the self-assessment tool and information provided in this supporting guide is intended to help you ensure these high risk areas are adequately tackled in your modern slavery processes too.

Finally, Shiva Foundation and STOP THE TRAFFIK conducted 16 interviews with stakeholders from 13 different public sector bodies and organisations around the country. Stakeholders provided details on their needs when addressing modern slavery in their operations and supply chains, what they were already doing and where further support or guidance would be useful. The names and authorities remain anonymous, however the range of stakeholders interviewed include procurement officers, head of procurement and internal modern slavery leads.

The consultative interviews were conducted online and ranged from 30 minutes to 1 hour in duration. Shiva Foundation and STOP THE TRAFFIK asked these 16 professionals a range of questions touching on the following areas: gaps in addressing modern slavery risk in their organisation, internal capacity building, awareness raising of suppliers, modern slavery statements, internal policies, code of conduct and the support needed at local level to address risks (see **Annex 3** for full list of questions asked during consultation). Nine interviewees also provided detailed feedback via email on the questions that eventually made it into the online self-assessment tool. The answers provided in this consultation and email feedback fed into the final versions of both the self-assessment tool and guide.

Annex 3: Full list of questions used during consultation

1. In your opinion, what are the needs of your organisation in general, in addressing modern slavery risk:

  a. Within your operations/organisation

  b. Within your supply chains?

2. Does X local Authority have a Modern Slavery statement, or code of conduct?

  a. If not, what can be done to support the creation of one?

  b. If yes, is it being followed and put into practice?

    i. If not, why? What are the blockers? (HR, Knowledge, resourcing barrier?)

3. What is your organisation's process for identifying Modern Slavery in its supply chain?

  a. Do you investigate, or risk map your supply chain?

  b. Do you identify risks associated with employees in your supply chain?

  c. Is this for both goods and services?

    i. What is your policy for contracted labour?

  d. Do you request that suppliers have their own policy?

4. What is your policy for raising grievances when it comes to modern slavery and exploitation?

5. How does licensing work in the sector you licence? (For those who don't have a licence, what is your understanding of the process?)

  a. Does your licensing statement directly include modern slavery?

  b. What challenges do you foresee embedding modern slavery in licensing frameworks (including training)?

6. What current training do you and other members of staff receive around Modern Slavery?

  a. Is this training internal, or external?

  a. Do you feel as though you need more training to identify risks?

    i. If so, what kind of training would this be, and who should it target?

7. Where do you go for information surrounding modern slavery and exploitation?

8. Are you aware of any modern slavery working groups in your local authority?

  a. Are you aware of any collaborative practices to tackle Modern Slavery? Perhaps across departments or with external organisations?

9. Is there anything else important you want to add?

Annex 4: Full list of the questions in the scorecard

The 12 main questions are highlighted in yellow and the corresponding sub-questions sit underneath them.

No.	Question	Answer Options	Points
1	Question 1 of 12) Does your organisation have a modern slavery statement that outlines your stance and commitment to tackling modern slavery? If your organisation doesn't have a modern slavery statement, has modern slavery been embedded into other relevant policies such as recruitment and procurement? For example, a 'Transparency in Supply Chains' statement with a commitment to tackling modern slavery. Choose only ONE answer	Yes/No/Partial/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	Is your statement publicly available? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 point
b	Which of the following does your statement specifically mention? Choose as many as you like	■ Responsible recruitment processes (e.g. banning fees/one-month fee, etc.) ■ Modern slavery training ■ Protecting freedom of movement among your employees / Banning withholding of passports or other personal documentation ■ Protecting freedom of association for your employees ■ Protection against unfair purchasing practices ■ Key risk areas ■ Processes for identifying and managing risks in procurement of both goods and services ■ Requiring suppliers to implement their own standards with their supply chain that are in line with your policy/ code of conduct ■ Internal-grievance mechanism for your employees ■ Remediation for forced labour violations	1 point for every box you tick

No.	Question (continued)	Answer Options	Points
c	Has your organisation embedded your modern slavery commitment into your day-to-day operations? For example, via a staff policy, a supplier code of conduct, a reporting procedure etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
d	Does your organisation have a process and procedures in place to ensure that modern slavery policies are signed off by senior management, and senior management are informed of any modern slavery related developments? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
e	Who is required to sign off on your organisation's modern slavery statement? Choose as many as you like	Multiple choice - ■ Modern slavery lead(s) ■ Senior Management ■ CEX, Director, Chief Executive or equivalent	1 point for every box you tick
2	Question 2 of 12) Do you use training to raise awareness of modern slavery among your all your staff? Choose only ONE answer	Yes/No/Mostly/Partial/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	Which of the following types of training do you offer? Choose as many as you like	Multiple choice: ■ Stand alone modern slavery training ■ Department / role specific training (e.g. procurement staff, HR etc.) ■ E-training modules ■ In person training	1 point for every box you tick
b	What aspects of modern slavery does your training cover? Choose as many as you like	Multiple choice: ■ Definition of modern slavery and key terminology ■ Modern slavery statement ■ Explanations of relevant policies and protocols ■ How to identify and address risks in the supply chain / procurement management ■ Department specific guidance ■ Legislative requirements ■ How to identify and address labour rights risks ■ Practical examples and case studies ■ Key indicators ■ Prevention protocols ■ Reporting (including information on how to reassure staff when they've reported something, regardless of the outcome ■ Remedy options ■ Monitoring and evaluation	1 point for every box you tick

No.	Question (continued)	Answer Options	Points
c	Who in your organisation is trained on tackling modern slavery? Choose as many as you like	Multiple choice: - Front line staff - Administration staff - Middle management - Senior executive management - Executive team (Directors)	1 point for every box you tick
d	What proportion (approximate %) of staff are trained on tackling modern slavery? You may need to liaise with other departments to answer this question. Choose only ONE answer	Multiple choice: - 1-20% - 21-50% - 51-75% - 76-100%	1-20% - 1 point 21-50% - 2 points 51-75% - 3 points 76-100% - 4 points
e	Is knowledge tested after modern slavery training? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
f	Is knowledge on tackling modern slavery refreshed at regular intervals? For example, through refresher training, staff meetings etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
3	Question 3 of 12) If any staff members has a question relating to modern slavery, is it clear who they can go to within the organisation? You may need to liaise with other departments to answer this question. Choose only ONE answer	Yes/No/Partially/Mostly/Don't know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	Who can staff members go to if they have a question on modern slavery? Choose as many as you like	Multiple choice (can select multiple): - Their manager - Safeguarding lead / Internal modern slavery lead (single point of contact) - External modern slavery lead (single point of contact) - Internal modern slavery team / unit	1 point for every box you tick
4	Question 4 of 12) Does your organisation carry out modern slavery risk assessments of all of its suppliers? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

No.	Question (continued)	Answer Options	Points
a	What factors do you consider in your modern slavery risk assessment of suppliers? Choose as many as you like	Multiple choice: ■ List of suppliers and/or list of high risk suppliers ■ Country-level risk (e.g. high prevalence of child labour, known corruption issues) ■ Industry type and risk factors (e.g. lack of oversight of working conditions, high prevalence of low-paid migrant workers) ■ Analysis of key risks identified ■ Total spend with each supplier ■ Complexity of supply chain ■ The nature of the workforce ■ Recommendations for risk mitigation activities	1 point for every box you tick
b	When assessing the modern slavery risk of the products you procure, do you take into account each component of the product? For example, parts, raw materials, manufacturing plants, shipping companies etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
c	When assessing the modern slavery risk of sub-contracted labour you use, do you specifically consider whether people are being recruited and treated fairly? For example, agencies charging recruitment fees, contract deception, wages deductions, long working hours for low payment and the use of excessive force etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
d	What sources of information on modern slavery risk do you use? Choose as many as you like	Multiple choice: ■ Global modern slavery reports (e.g. Global Slavery Index and TIP reports) ■ Audit data etc ■ Supplier TISC statements ■ Country sourcing information (e.g. US Gov't responsible sourcing tool) ■ Managing Risks (ETI, Ergon, Shift red flags, ETI base code) ■ Industry risks (e.g. GLAA industry profiles) ■ Risk mapping tools (HO MSAT, SRA, Mekong Club Risk Map) ■ Other Academic research ■ NGO resources	1 point for every box you tick

No.	Question (continued)	Answer Options	Points
e	Which of the following methods for collecting and storing data about your suppliers does your organisation currently utilise? Choose as many as you like	Multiple choice ■ Organising data by supplier (not just purchase) ■ Using unique identifiers for suppliers ■ Tracking and recording specific products being procured ■ Tracking and recording where products are being procured from ■ Ensuring data in your system is exportable to conduct analyses	1 point for every box you tick
f	Which tiers of supplier does your organisation include in its modern slavery risk assessment? Choose as many as you like	Multiple choice ■ Tier 1 ■ Tier 2 ■ Tier 3 onwards	1 point for every box you tick
g	How often is your organisation's modern slavery risk assessment refreshed? Choose only ONE answer	■ Every year ■ 2-3 years ■ 3+ years ■ Only once	Every year - 3 Points 2-3 years - 2 Points 3+ years - 1 Point Only once - 0 Points
h	Does your organisation's modern slavery risk assessment inform supplier contract management? For example, working with suppliers to reduce risk, investigating suppliers to mitigate possibility of modern slavery etc. Choose only ONE answer	Yes / No	Yes - 1 point
i	Have you identified any of the following as medium-high risk areas during your risk assessment? Choose as many as you like	Multiple choice: ■ Construction projects ■ Facilities management ■ Care facilities ■ Waste management ■ Leisure ■ Hospitality ■ Textiles/clothing ■ IT/electronics ■ Housing ■ Manufacturing ■ Agriculture ■ Other	1 point for every box you tick
5	Question 5 of 12) Does your organisation ensure that all prioritised suppliers address modern slavery within their own supply chains? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

No.	Question (continued)	Answer Options	Points
a	How does your organisation ensure this is achieved? Choose as many as you like	Multiple choice: ■ An informal request to suppliers about their aproach to tackling modern slavery ■ A formal written request to suppliers to provide information about their approach to tackling modern slavery ■ A contractual clause requiring suppliers to have specific approaches to tackling modern slavery in place ■ A contractual clause and an audit to confirm your supplier is doing what you required of them	An informal request to suppliers - 1 point A formal written request to suppliers - 2 points A contractual clause - 3 points A contractual clause and an audit - 4 points
b	Is this monitored and reviewed on an ongoing basis? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
6	Question 6 of 12) As part of the procurement process, does your organisation require all prioritised suppliers to sign a clause committing to tackling modern slavery? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	At which stages do you mention tackling modern slavery with your suppliers? Choose as many as you like	Multiple choice: ■ Tender process ■ Contract award process ■ Contract management process ■ Contract review process ■ Auditing process	1 point for every box you tick
7	Question 7 of 12) Does your organisation build the knowledge of your prioritised suppliers on modern slavery standards and practices (e.g. through training, resources etc).? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What proportion (approximate %) of suppliers are supported to build their knowledge on modern slavery standards and practices (e.g. through training, resources etc)? Choose only ONE answer	Multiple choice: ■ 1-20% ■ 21-50% ■ 21-75% ■ 76-100%	1-20% - 1 point 21-50% - 2 points 21-75% - 3 points 76-100% - 4 points
b	Is the training specific to the risk of the particular industry? Choose only ONE answer	Yes/No	Yes = 1 Point No = 0 Points
c	Is supplier knowledge tested? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points

No.	Question (continued)	Answer Options	Points
d	Is supplier knowledge on tackling modern slavery refreshed at regular intervals? For example, through refresher training, providing further resources etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
8	Question 8 of 12) Does your organisation have a process in place to audit all your prioritised suppliers for modern slavery risks? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What auditing method(s) do you utilise? Choose as many as you like	Multiple choice: ■ Questionnaire ■ Management interviews ■ Scheduled site visits ■ Surprise site visits ■ Worker interviews	Worker interviews - 5 Points Surprise site visits - 4 Points Scheduled visits - 3 Points Management interviews - 2 Points Questionnaire - 1 Point
b	How often are suppliers generally audited? Choose only ONE answer	Multiple choice: ■ 1-5 years ■ 6-10 years ■ 11+ years	1-5 years - 3 Points 6-10 years - 2 Points 11+ years - 1 Point
9	Question 9 of 12) Are there clear and accessible pathways for directly employed staff to report modern slavery concerns? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What are the pathways for directly employed staff to report modern slavery concerns? Choose as many as you like	Multiple choice (can tick more than one): ■ Report directly to their manager ■ Report to Human Resources (HR) ■ Report via an anonymous helpline or email address ■ Report to an external grievance mechanism specialist service	Report directly to your manager - 1 point Report to HR - 2 points Report via an anonymous helpline or email address - 3 points Report to an external grievance mechanism specialist service - 4 points
10	Question 10 of 12) Are there clear and accessible pathways for subcontracted staff to report modern slavery concerns? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

No.	Question (continued)	Answer Options	Points
a	What are the pathways for subcontracted staff to report modern slavery concerns? Choose as many as you like	Multiple choice (can tick more than one): ■ Report directly to their manager ■ Report to Human Resources (HR) ■ Report via an anonymous helpline or email address ■ Report to an external grievance mechanism specialist service	1 point for every box you tick
b	Is this part of your contracted expectations for suppliers? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 point
11	Question 11 of 12) Does your organisation have a process in place to remediate possible modern slavery cases if they are discovered? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What is included in this remediation process? Choose as many as you like	Multiple choice: ■ Initial incident report ■ Collaborative investigation with statutory services ■ Cooperation with victim support services ■ A root cause analysis	1 point for every box you tick
b	How many cases have been discovered in the past year. Choose only ONE answer	Multiple choice: ■ None ■ 1 - 5 ■ 6 - 10 ■ 11+	None - 0 Points 1 - 5 - 1 Point 6 - 10 - 2 Points 11+ - 3 Points
12	Question 12 of 12) Does your organisation consistently collaborate with others on tackling modern slavery? For example, via working groups, modern slavery networks, data-sharing, resource sharing etc. Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

No.	Question (continued)	Answer Options	Points
a	Which of the following bodies do you collaborate with? Choose as many as you like	Multiple choice: ■ Modern slavery working groups/networks / Anti-slavery partnerships ■ Multi-agency safeguarding partnerships ■ Police / Law enforcement organisations/ local police and crime commissioner ■ Housing providers / Housing associations ■ Social care organisations ■ Local authorities ■ Business / Business advocacy organisations ■ Government departments/ Government agencies ■ Charities ■ Civil society organisations ■ Labour providers ■ Job centres ■ Local politicians / Political groups ■ Educational institutions / organisations ■ Religious institutions / organisations	1 point for every box you tick
	TOTAL SCORE		**400**

Annex 5: Key terminology

Audit	To conduct an official inspection of a company and its procedures and code of conduct.
Care home facilities	Facilities for the residential care of elderly or disabled people.
Code of conduct	A document which lays out the company's principles, standards, and the moral and ethical expectations that employees and third parties are held to as they interact with the organisation.
Contracting	Creating legally enforceable agreements that define and govern mutual rights and obligations among its parties, typically involving the transfer of goods, services, money.
Facilities management	The tools and services that support the maintenance of an organisation's buildings and landscape.
Grievance	An official concern, problem or complaint over something believed to be wrong or unfair.
Human trafficking	Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.
Key thematic action area	Eight themes outlined in this guide and scorecard, each relating to a particular set of actions you can take to address modern slavery in your organisation.
Modern slavery	Modern slavery is the illegal exploitation of people for personal or commercial gain, including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting. Modern slavery is a complex crime and exists on a spectrum ranging from minor labour market infringements on one end of the spectrum, all to way to grave human trafficking offencing. Sections 1-4 of the MSA outline some of the offences covered by the crime. Examples of exploitative practices that could amount to modern slavery include: - Labour market infringement: - Nonpayment of minimum wage - Lack of personal protective equipment (PPE) - Few or no breaks - Demeaning treatment - Long working hours - Forced labour: - Worker is controlled, forced or coerced to perform work - No payment, withholding of wages or excessive wage reductions - Retention of identity documents or valuable possessions - Restriction of movement or confinement to the workplace - Threat of denunciation to authorities (mainly illegal migrant workers) - More severe forms of exploitation - Human trafficking - Physical violence - Forced prostitution - Forced begging - Forced marriage - Harassment

Modern Slavery Act	An act passed in 2015, designed to combat modern slavery in the UK. A key provision requires certain organisations to produce an annual slavery statement that sets out what action has been taken to eradicate it within their business or supply chains.
Non-governmental organisations (NGO)	A non-profit organisation that operates independently of any government, typically whose purpose is to address a social or political issue.
Operations	Activities that businesses engage in on a daily basis to increase the value of the enterprise and earn profit.
Private sector	The part of the national economy that is not under direct state control.
Procurement	The act of obtaining the goods and services a company needs to support its daily operations.
Public sector bodies	An organisation that is, at least in part, publicly funded to deliver a public or government service, though not as a ministerial department.
Remediate	The process or act of correcting something.
Risk assessments	Evaluating the potential risks that may be involved in a projected activity or undertaking.
Risks	A situation involving exposure to danger or harm.
Stakeholders	A party with an interest in a person with an interest or concern in something.
Supplier	A person or organisation that provides a product or service to another entity.
Supply chains	The network of individuals, organisations, resources, and activities involved in the creation and sale of a product.
Working groups	A group of experts working together to achieve specific goals.

Annex 6: Key findings - Stakeholder interviews

Between February and March 2022, Shiva Foundation and STOP THE TRAFFIK conducted **16 interviews** with various stakeholders from **11 different local authorities** around the country. Of the 16 stakeholders who took part, 15 stakeholders were local authorities and 1 was a stakeholder who works closely with local authorities. Of the 11 authorities represented, 7 are unitary authorities and 4 are two-tiers authorities. The interviews were spread across a range of role and departments, for example:

- Policy and Improvement Teams
- Modern Slavery Coordinators
- Procurement and Contract management Teams

While not a substantive research project (and there are many academic papers, some linked above, if that's what you're looking for), **this research acted as a touchpoint and guide to ground this scorecard in the reality of what local authorities face when it comes to tackling modern slavery**. These conversations revealed the gaps in their organisation's knowledge surrounding modern slavery and their practices in mitigating it, and how prepared they are to publish their modern slavery statement when the new legislation comes into effect.

One of the most prominent gaps identified in the interviews was training. 75% (12) of stakeholders interviewed stated that they felt there are gaps in the training offered to specific departments on modern slavery. It is important to note that different departments may encounter modern slavery in different ways and training must be tailored to each one. However, stakeholders reported that training remained very general and even non-existent for certain departments. Other findings included inconsistencies surrounding who delivers the training and training only being delivered to one member per team, rendering it less impactful in the long run.

Another gap identified in the interviews was capacity and resource: 69% (11) of participants felt that a lack of resource and capacity meant they are unable to check whether their suppliers are compliant with modern slavery terms and conditions. The procurement professionals we spoke to emphasised that checking suppliers are compliant, rather than merely requiring suppliers to comply with modern slavery terms and conditions contained in bids, requires allocating far more time and resources which they currently don't have. Moreover, with competing priorities, modern slavery is at risk of slipping down the agenda. Recent research looking into modern slavery initiatives in the licensing sector, reveals that these concerns are also shared among licensing departments. Shiva Foundation worked with licensing departments around the country to assess how existing

licensing frameworks can be utilised to tackle modern slavery 2022. This research is yet to be published at the time of this guide's publication but is due out in early 2023.

Developing and sharing modern slavery statements and policy was another area of concern for local authorities, with 50% (8) of participants highlighting that they needed support with developing and sharing a robust modern slavery statement. Whilst having a modern slavery statement is currently not compulsory for local authorities, it is good practice. Nevertheless, it was recognised that often these statements are not robust enough, rarely extending beyond examining tier one of supply chains and rarely including information on the work of licensing and procurement teams.

Another knowledge gap highlighted during the interviews was clarity on procedures associated with raising modern slavery grievances. 50% (8) of stakeholders interviewed were unclear of the steps to take if a modern slavery grievance arose. There are various possible routes that an employee may take if they suspect modern slavery, for example going to their line manager, an HR manager, modern slavery coordinator, act via their authority's whistleblowing policy, or even go to the police. These multiple reporting routes can be confusing for employees and potentially stops them from acting. It is vital to make these reporting pathways as simple and effective as possible.

It is widely accepted that creating and being a part of a working group is considered best practice as it facilitates information sharing, joint operations and resource sharing. However, during this research, working group organisation arose as another issue, with 38% (6) of stakeholders either not being part of a working group or feeling that their working group required more organisation. The information sharing these groups provide can be invaluable to the work of local authorities, yet many are missing out on these benefits due to a lack of access, engagement and buy-in from partners. This is more often than not due to the fact that lack of resources leaves these groups without a dedicated coordinator and, instead, are run by individuals in addition to their existing roles.

The interviews also revealed challenges for the local authorities regarding the availability, storage and management of data regarding their suppliers. In fact, 25% (4) of stakeholders who took part in our research felt that they lack sufficient data on modern slavery in their operations and supply chains.

Another area where further support is needed is risk mapping. 32% (5) of the stakeholders interviewed didn't feel able to identify and map the risk of modern slavery in their operations and supply chains. Without risk mapping however, organisations remain unaware of which areas in their operations and supply chains are at an increased risk, preventing them from identifying cases or reducing the risk. Often, more prescriptive guidance on how to assess risk of modern slavery from a procurement perspective is needed, especially in organisations that do not have a procurement specialist on staff.

Buy-in from senior managers also arose as a less prominent point of concern. 19% (3) stakeholders that took part in the research felt that, where initiatives to tackle modern slavery arose within their local authorities, it was challenging to get senior management buy-in. In order for anti-slavery efforts to materialise, it is key for support to come from the top down, from managers to local councillors. For example, the Home Office chairs the cross-government commercial director-level Anti-Slavery Advocates Network and the working level Modern Slavery and Procurement Implementation Group to build on the cross-government momentum. The Home Office has also established a public sector working group. People wishing to find out more or join one can email MSCommercial@homeoffice.gov.uk

The final area of concern identified for some was clarity for staff on information sources of modern slavery, with 19% (3) of stakeholders interviewed stating that they were unclear of where to go to access relevant information. Often, there is no single point of contact that an employee can reach out to if they have a question on the topic and, while there is a wealth of free training available, it can be overwhelming, too generic and incomplete.

For a full list of the questions asked during these interviews, see **Annex 3**.

Annex 7: Key findings - Modern slavery statements

Shiva Foundation reviewed 103 of the 168 statements published on the [Local Government Association website](#). This research specifically looked at tier 1 and 2 authorities and excluded statements from other public sector bodies like the police or fire and rescue.

The majority of the statements were grouped under three categories:

40 out of 103 statements were incomplete, missing the point, insufficient information and/or overall is a poor statement. This totalled to 39% of those who have statements that we reviewed and if coupled with the number of local authorities who don't have statements, that's 62% of all local councils.

42 out of 103 statements contained some good sections, but other sections were wither of low quality or missing.

15 out of 103 statements were the best statements of those reviewed. They were not necessarily perfect or should even be considered exemplary, but they covered the relevant sections relatively well. This totalled 15% of those who have statements that we reviewed and 5% of all local authorities).

6 out of 103 statements were ungrouped.

Main findings:

- This research shows that the **date of publishing** of these statements were inconsistent. Some statements were published in 2017, whilst others were published in 2021 and seem to be updated annually. It's unclear whether this is due to lack of knowledge about the need to publish annually or that they've been publishing voluntarily to date and therefore local authorities don't believe they need to update it regularly.

- **Misconceptions:** The common misconception was about the **purpose of the statement**. Many statements focused on section 52 (duty to notify), partnership working and safeguarding and supporting victims. There seems to be less awareness about section 54 and what the statement is actually about.

- Most statements spent this section describing the MSA and the definitions of human trafficking and slavery, without addressing **structure, business needs and supply chains**. Only 20 of the 103 statements touched on this area, although not in very much detail.

- The vast majority of the statements listed almost the exact same policies (e.g., recruitment, whistleblowing, safeguarding, employee code of conduct, agencies policy, procurement, equality and diversity). The majority of statements dedicated most attention to this section.

- **Risk assessment and mitigation:** 78 out of 103 statements do not mention risk assessments, which shows that this is an underserved area within modern slavery statements.

- 8 of 103 council statements reviewed listed their **high-risk areas**. They included:

  - Agriculture
  - Low paid service contracts (cleaning, catering security guards, care workers, gardeners)
  - Leisure
  - Hospitality
  - Construction
  - Textiles/clothing
  - IT/Electronics
  - Mined materials
  - Commercial properties
  - Housing
  - Manufacturing
  - Complex employment relationships
  - Reliance on agency workers/low-skilled or unskilled labour

- The vast majority of statements stopped at asking suppliers (within vetting, or contract management) whether they were compliant with the MSA. No further **due-diligence processes** took place.

- Only 29 of the statements attempted to provide for some sort of **effectiveness measurement**, however even those were not strong and didn't link with the provisions for safeguarding worker welfare. A handful listed **KPIs** (including NRM reports, number of people trained, or measuring against action plans). This is an area that requires more attention.

- Almost all statements had some text dedicated to **training** provision for staff (whether mandatory or not, e-learning, in person, one-off or refreshed). Only 13 out of 103 statements specify specific training for procurement staff (although no other members of staff were mentioned – e.g., HR). All other training focuses mainly on safeguarding in their community-facing roles. There is no information on how learning is assessed.

Annex 8: Acknowledgements

We want to thank the contribution of project partners, The Mekong Club and STOP THE TRAFFIK, along with the 16 stakeholders who took part in the research interviews, highlighting the main needs of local authorities in addressing modern slavery risk in their operations and supply chains. To everyone who contributed – thank you. The scorecard and guide is a result of your insights, passion, and expertise.

Assessing your
MODERN SLAVERY
Risk

**A Self-Assessment Scorecard and
Supporting Guidance for Local Authorities**

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PEOPLE SHOULDN'T BE BOUGHT & SOLD