ASSESSING YOUR MODERN SLAVERY RISK SECTION 1 OF 3

Section 1: About this guide and how to use it

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1. About this guide

The self-assessment scorecard and this corresponding guidance were jointly created by <u>Shiva Foundation</u>, <u>The Mekong Club</u> and <u>Stop The Traffik</u> 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 <u>Modern Slavery Act's</u> 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:



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 <u>Transparency in</u> <u>supply chains consultation</u>, 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 <u>Home Office Registry</u>. And while the <u>Local Government Association</u> (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 selfassessment 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
8	Modern Slavery Leads
\triangle	Risk Assessments
	Procurement Protocols and Supplier Engagement
Į;=	Audit Protocols
	Reporting and Remediation protocols
ASS -	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.



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.