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…<u>home office tool</u>, 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.
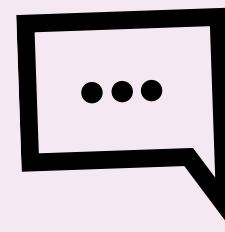
Assistant Director for Procurement and Contract Management

"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.

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: Tackling Modern Slavery in PPE Supply Chains ■ Verite: Fair Hiring Toolkit ■ Stop Slavery Network: Recruitment Fees ■ IHRB: 6 Steps to Responsible Recruitment ■ SME Toolkit: Section 4 (pp.13) ■ Shiva Foundation's Stop Slavery Blueprint, pages 32-35 ■ Association of Labour Providers ■ Stronger Together: Responsible Recruitment Policy ■ Tackling Modern Slavery in Business: Employer Implementation Checklist ■ BSI Standard for Organisational Responses to Modern Slavery

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. ■ Government guidance on Tackling Modern Slavery in Government Supply Chain, Annex A ■ Olga Martin-Ortega and Andy Davies: Modern Slavery Statement Checker

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.
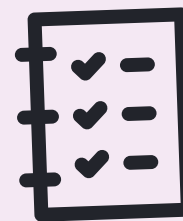
As part of this process, organisations may also audit their suppliers to ensure their supplier's practices are consistent with their organisation's modern slavery objectives.

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.

Head of Category

"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. "

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.
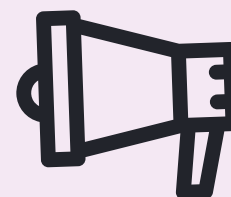
To ensure that both potential victims and employees are safeguarded, all employees within the organisation (regardless of their migration status) should have the ability to raise red flags and possible concerns related to modern slavery, in a safe, secure and accessible way. This can lead to the quick 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.