

Section 3: Annexes

Annex 1: Local authority case studies	2
Annex 2: Research methodology	10
Annex 3: Full list of questions used during consultation	12
Annex 4: Full list of the questions in the scorecard	13
Annex 5: Key terminology	22
Annex 6: Key findings - Stakeholder interviews	24
Annex 7: Key Findings - Modern slavery statements	27
Annex 8: Acknowledgements	29

Annex 1: Local authority case studies

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

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

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

1.1 Methodology

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

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

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

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

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

- Country Risk:** For country risk, factors such as national law, peace and stability, and rights of individuals will affect its risk level
Example variables: Employment rights, civil liberties, corruption, and rule of law.
- Sector Risk:** For sector risk, factors like the prevalence of subcontracting or reliance on manual labour impact a sector's risk.
Example variables: Sector employment of low-skilled or manual labourers.

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

1.2 Key findings

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

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

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

1.3 London Borough Council Profile

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

Based on the analysis of these suppliers, the Council's spend was distributed across the different risk categories in the following proportions, found in Figure 1.

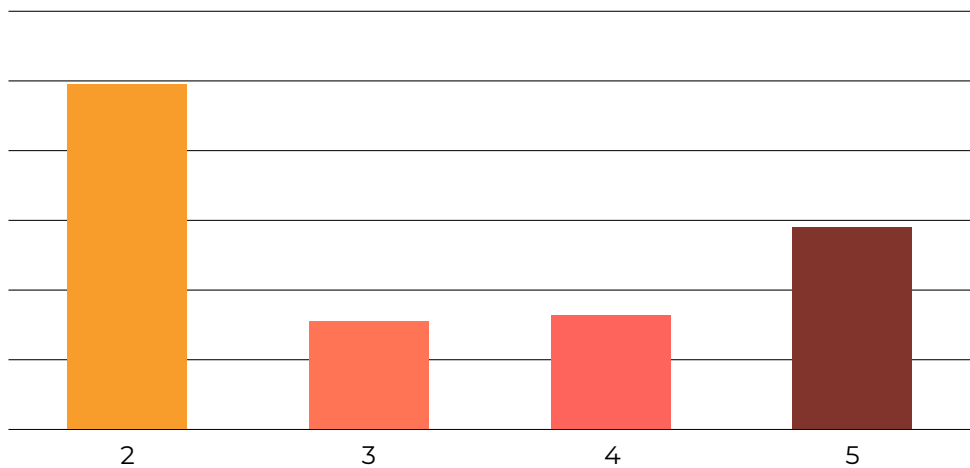


Figure 1: London Borough Council's spend by total risk (low to high).

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

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

The council has high risk spend in only a few suppliers, meaning that they can address risk efficiently without having to engage many suppliers. Addressing the risk of all 55 suppliers in level 5 would be a good long-term goal. This is demonstrated in figure 2 below:

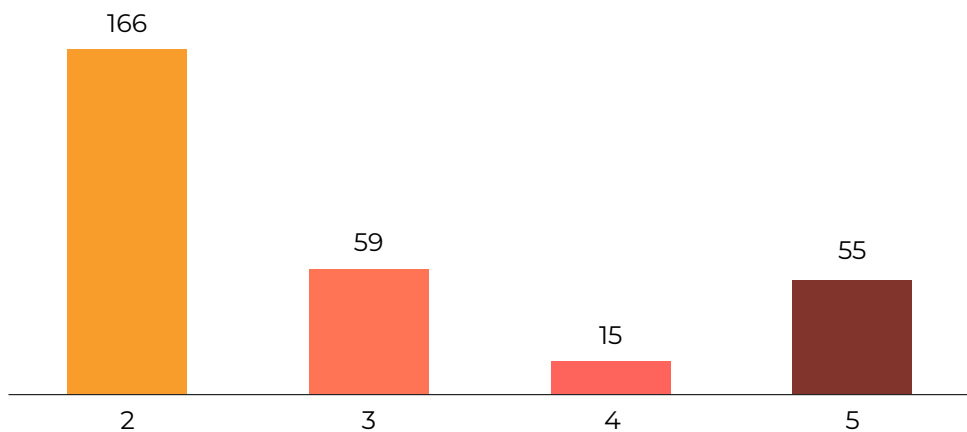


Figure 2: London Borough Council's supplier count by total risk (low to high).

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

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

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

Initial Next Steps for the London Borough Council

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

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

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

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

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

1.4 County Council Profile

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

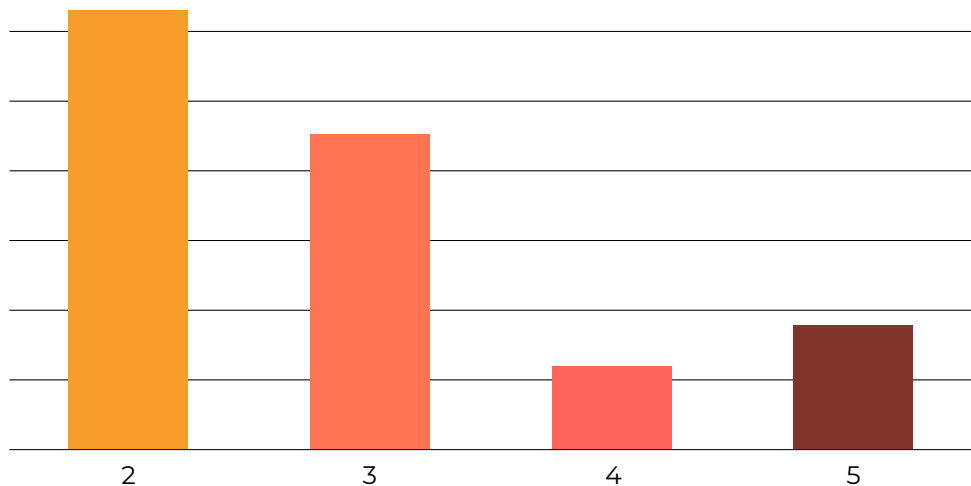


Figure 3: The County Council's spend by total risk (low to high).

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

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

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

This means that the County Council can prioritise mitigation and ensure high risk spend is addressed whilst focusing mitigation efforts on a small number of suppliers. This disparity between the amount of high and low risk suppliers is demonstrated in figure 4:

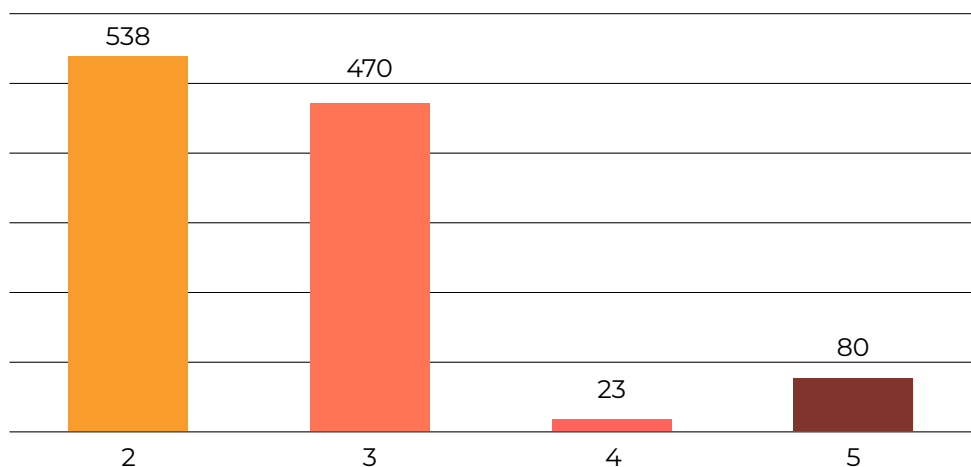


Figure 4: The County Council's supplier count by total risk (low to high)

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

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

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

Initial Next Steps for the County Council

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

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

Annex 2: Research methodology

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

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

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

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

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

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

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

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

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

Annex 3: Full list of questions used during consultation

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

- a. Within your operations/organisation
- b. Within your supply chains?

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

- a. If not, what can be done to support the creation of one?
- b. If yes, is it being followed and put into practice?
 - i. If not, why? What are the blockers? (HR, Knowledge, resourcing barrier?)

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

- a. Do you investigate, or risk map your supply chain?
- b. Do you identify risks associated with employees in your supply chain?
- c. Is this for both goods and services?
 - i. What is your policy for contracted labour?
- d. Do you request that suppliers have their own policy?

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

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

- a. Does your licensing statement directly include modern slavery?
- b. What challenges do you foresee embedding modern slavery in licensing frameworks (including training)?

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

- a. Is this training internal, or external?
- a. Do you feel as though you need more training to identify risks?
 - i. If so, what kind of training would this be, and who should it target?

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

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

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

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

Annex 4: Full list of the questions in the scorecard

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

No.	Question	Answer Options	Points
1	<p>Question 1 of 12) Does your organisation have a modern slavery statement that outlines your stance and commitment to tackling modern slavery? If your organisation doesn't have a modern slavery statement, has modern slavery been embedded into other relevant policies such as recruitment and procurement?</p> <p>For example, a 'Transparency in Supply Chains' statement with a commitment to tackling modern slavery.</p> <p>Choose only ONE answer</p>	Yes/No/Partial/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	<p>Is your statement publicly available?</p> <p>Choose only ONE answer</p>	Yes/No	Yes - 1 point No - 0 point
b	<p>Which of the following does your statement specifically mention?</p> <p>Choose as many as you like</p>	<ul style="list-style-type: none"> ▪ Responsible recruitment processes (e.g. banning fees/ one-month fee, etc.) ▪ Modern slavery training ▪ Protecting freedom of movement among your employees / Banning withholding of passports or other personal documentation ▪ Protecting freedom of association for your employees ▪ Protection against unfair purchasing practices ▪ Key risk areas ▪ Processes for identifying and managing risks in procurement of both goods and services ▪ Requiring suppliers to implement their own standards with their supply chain that are in line with your policy/ code of conduct ▪ Internal-grievance mechanism for your employees ▪ Remediation for forced labour violations 	1 point for every box you tick

No.	Question (continued)	Answer Options	Points
c	<p>Has your organisation embedded your modern slavery commitment into your day-to-day operations?</p> <p>For example, via a staff policy, a supplier code of conduct, a reporting procedure etc.</p> <p>Choose only ONE answer</p>	Yes/No	Yes - 1 point No - 0 points
d	<p>Does your organisation have a process and procedures in place to ensure that modern slavery policies are signed off by senior management, and senior management are informed of any modern slavery related developments?</p> <p>Choose only ONE answer</p>	Yes/No	Yes - 1 point No - 0 points
e	<p>Who is required to sign off on your organisation's modern slavery statement?</p> <p>Choose as many as you like</p>	<p>Multiple choice -</p> <ul style="list-style-type: none"> ■ Modern slavery lead(s) ■ Senior Management ■ CEX, Director, Chief Executive or equivalent 	1 point for every box you tick
2	<p>Question 2 of 12) Do you use training to raise awareness of modern slavery among your all your staff?</p> <p>Choose only ONE answer</p>	Yes/No/Mostly/Partial/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	<p>Which of the following types of training do you offer?</p> <p>Choose as many as you like</p>	<p>Multiple choice:</p> <ul style="list-style-type: none"> ■ Stand alone modern slavery training ■ Department / role specific training (e.g. procurement staff, HR etc.) ■ E-training modules ■ In person training 	1 point for every box you tick
b	<p>What aspects of modern slavery does your training cover?</p> <p>Choose as many as you like</p>	<p>Multiple choice:</p> <ul style="list-style-type: none"> ■ Definition of modern slavery and key terminology ■ Modern slavery statement ■ Explanations of relevant policies and protocols ■ How to identify and address risks in the supply chain / procurement management ■ Department specific guidance ■ Legislative requirements ■ How to identify and address labour rights risks ■ Practical examples and case studies ■ Key indicators ■ Prevention protocols ■ Reporting (including information on how to reassure staff when they've reported something, regardless of the outcome) ■ Remedy options ■ Monitoring and evaluation 	1 point for every box you tick

No.	Question (continued)	Answer Options	Points
c	Who in your organisation is trained on tackling modern slavery? Choose as many as you like	Multiple choice: <ul style="list-style-type: none"> ■ Front line staff ■ Administration staff ■ Middle management ■ Senior executive management ■ Executive team (Directors) 	1 point for every box you tick
d	What proportion (approximate %) of staff are trained on tackling modern slavery? You may need to liaise with other departments to answer this question. Choose only ONE answer	Multiple choice: <ul style="list-style-type: none"> ■ 1-20% ■ 21-50% ■ 51-75% ■ 76-100% 	1-20% - 1 point 21-50% - 2 points 51-75% - 3 points 76-100% - 4 points
e	Is knowledge tested after modern slavery training? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
f	Is knowledge on tackling modern slavery refreshed at regular intervals? For example, through refresher training, staff meetings etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
3	Question 3 of 12) If any staff members has a question relating to modern slavery, is it clear who they can go to within the organisation? You may need to liaise with other departments to answer this question. Choose only ONE answer	Yes/No/Partially/Mostly/Don't know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	Who can staff members go to if they have a question on modern slavery? Choose as many as you like	Multiple choice (can select multiple): <ul style="list-style-type: none"> ■ Their manager ■ Safeguarding lead / Internal modern slavery lead (single point of contact) ■ External modern slavery lead (single point of contact) ■ Internal modern slavery team / unit 	1 point for every box you tick
4	Question 4 of 12) Does your organisation carry out modern slavery risk assessments of all of its suppliers? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

No.	Question (continued)	Answer Options	Points
a	<p>What factors do you consider in your modern slavery risk assessment of suppliers?</p> <p>Choose as many as you like</p>	<p>Multiple choice:</p> <ul style="list-style-type: none"> ■ List of suppliers and/or list of high risk suppliers ■ Country-level risk (e.g. high prevalence of child labour, known corruption issues) ■ Industry type and risk factors (e.g. lack of oversight of working conditions, high prevalence of low-paid migrant workers) ■ Analysis of key risks identified ■ Total spend with each supplier ■ Complexity of supply chain ■ The nature of the workforce ■ Recommendations for risk mitigation activities 	1 point for every box you tick
b	<p>When assessing the modern slavery risk of the products you procure, do you take into account each component of the product?</p> <p>For example, parts, raw materials, manufacturing plants, shipping companies etc.</p> <p>Choose only ONE answer</p>	Yes/No	Yes - 1 point No - 0 points
c	<p>When assessing the modern slavery risk of sub-contracted labour you use, do you specifically consider whether people are being recruited and treated fairly?</p> <p>For example, agencies charging recruitment fees, contract deception, wages deductions, long working hours for low payment and the use of excessive force etc.</p> <p>Choose only ONE answer</p>	Yes/No	Yes - 1 point No - 0 points
d	<p>What sources of information on modern slavery risk do you use?</p> <p>Choose as many as you like</p>	<p>Multiple choice:</p> <ul style="list-style-type: none"> ■ Global modern slavery reports (e.g. Global Slavery Index and TIP reports) ■ Audit data etc ■ Supplier TISC statements ■ Country sourcing information (e.g. US Gov't responsible sourcing tool) ■ Managing Risks (ETI, Ergon, Shift red flags, ETI base code) ■ Industry risks (e.g. GLAA industry profiles) ■ Risk mapping tools (HO MSAT, SRA, Mekong Club Risk Map) ■ Other Academic research ■ NGO resources 	1 point for every box you tick

No.	Question (continued)	Answer Options	Points
e	Which of the following methods for collecting and storing data about your suppliers does your organisation currently utilise? Choose as many as you like	Multiple choice <ul style="list-style-type: none"> ■ Organising data by supplier (not just purchase) ■ Using unique identifiers for suppliers ■ Tracking and recording specific products being procured ■ Tracking and recording where products are being procured from ■ Ensuring data in your system is exportable to conduct analyses 	1 point for every box you tick
f	Which tiers of supplier does your organisation include in its modern slavery risk assessment? Choose as many as you like	Multiple choice <ul style="list-style-type: none"> ■ Tier 1 ■ Tier 2 ■ Tier 3 onwards 	1 point for every box you tick
g	How often is your organisation's modern slavery risk assessment refreshed? Choose only ONE answer	<ul style="list-style-type: none"> ■ Every year ■ 2-3 years ■ 3+ years ■ Only once 	Every year - 3 Points 2-3 years - 2 Points 3+ years - 1 Point Only once - 0 Points
h	Does your organisation's modern slavery risk assessment inform supplier contract management? For example, working with suppliers to reduce risk, investigating suppliers to mitigate possibility of modern slavery etc. Choose only ONE answer	Yes / No	Yes - 1 point
i	Have you identified any of the following as medium-high risk areas during your risk assessment? Choose as many as you like	Multiple choice: <ul style="list-style-type: none"> ■ Construction projects ■ Facilities management ■ Care facilities ■ Waste management ■ Leisure ■ Hospitality ■ Textiles/clothing ■ IT/electronics ■ Housing ■ Manufacturing ■ Agriculture ■ Other 	1 point for every box you tick
5	Question 5 of 12) Does your organisation ensure that all prioritised suppliers address modern slavery within their own supply chains? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

No.	Question (continued)	Answer Options	Points
a	How does your organisation ensure this is achieved? Choose as many as you like	Multiple choice: <ul style="list-style-type: none"> ■ An informal request to suppliers about their approach to tackling modern slavery ■ A formal written request to suppliers to provide information about their approach to tackling modern slavery ■ A contractual clause requiring suppliers to have specific approaches to tackling modern slavery in place ■ A contractual clause and an audit to confirm your supplier is doing what you required of them 	An informal request to suppliers - 1 point A formal written request to suppliers - 2 points A contractual clause - 3 points A contractual clause and an audit - 4 points
b	Is this monitored and reviewed on an ongoing basis? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
6	Question 6 of 12) As part of the procurement process, does your organisation require all prioritised suppliers to sign a clause committing to tackling modern slavery? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	At which stages do you mention tackling modern slavery with your suppliers? Choose as many as you like	Multiple choice: <ul style="list-style-type: none"> ■ Tender process ■ Contract award process ■ Contract management process ■ Contract review process ■ Auditing process 	1 point for every box you tick
7	Question 7 of 12) Does your organisation build the knowledge of your prioritised suppliers on modern slavery standards and practices (e.g. through training, resources etc).? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What proportion (approximate %) of suppliers are supported to build their knowledge on modern slavery standards and practices (e.g. through training, resources etc)? Choose only ONE answer	Multiple choice: <ul style="list-style-type: none"> ■ 1-20% ■ 21-50% ■ 51-75% ■ 76-100% 	1-20% - 1 point 21-50% - 2 points 51-75% - 3 points 76-100% - 4 points
b	Is the training specific to the risk of the particular industry? Choose only ONE answer	Yes/No	Yes = 1 Point No = 0 Points
c	Is supplier knowledge tested? Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points

No.	Question (continued)	Answer Options	Points
d	Is supplier knowledge on tackling modern slavery refreshed at regular intervals? For example, through refresher training, providing further resources etc. Choose only ONE answer	Yes/No	Yes - 1 point No - 0 points
8	Question 8 of 12) Does your organisation have a process in place to audit all your prioritised suppliers for modern slavery risks? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What auditing method(s) do you utilise? Choose as many as you like	Multiple choice: <ul style="list-style-type: none"> ■ Questionnaire ■ Management interviews ■ Scheduled site visits ■ Surprise site visits ■ Worker interviews 	Worker interviews - 5 Points Surprise site visits - 4 Points Scheduled visits - 3 Points Management interviews - 2 Points Questionnaire - 1 Point
b	How often are suppliers generally audited? Choose only ONE answer	Multiple choice: <ul style="list-style-type: none"> ■ 1-5 years ■ 6-10 years ■ 11+ years 	1-5 years - 3 Points 6-10 years - 2 Points 11+ years - 1 Point
9	Question 9 of 12) Are there clear and accessible pathways for directly employed staff to report modern slavery concerns? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points
a	What are the pathways for directly employed staff to report modern slavery concerns? Choose as many as you like	Multiple choice (can tick more than one): <ul style="list-style-type: none"> ■ Report directly to their manager ■ Report to Human Resources (HR) ■ Report via an anonymous helpline or email address ■ Report to an external grievance mechanism specialist service 	Report directly to your manager - 1 point Report to HR - 2 points Report via an anonymous helpline or email address - 3 points Report to an external grievance mechanism specialist service - 4 points
10	Question 10 of 12) Are there clear and accessible pathways for subcontracted staff to report modern slavery concerns? Choose only ONE answer	Yes/No/Partially/Mostly/Don't Know	Yes - 20 points Mostly - 10 points Partially - 5 points No / Don't know - 0 Points

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

No.	Question (continued)	Answer Options	Points
a	<p>Which of the following bodies do you collaborate with?</p> <p>Choose as many as you like</p>	<p>Multiple choice:</p> <ul style="list-style-type: none"> ■ Modern slavery working groups/networks / Anti-slavery partnerships ■ Multi-agency safeguarding partnerships ■ Police / Law enforcement organisations/ local police and crime commissioner ■ Housing providers / Housing associations ■ Social care organisations ■ Local authorities ■ Business / Business advocacy organisations ■ Government departments/ Government agencies ■ Charities ■ Civil society organisations ■ Labour providers ■ Job centres ■ Local politicians / Political groups ■ Educational institutions / organisations ■ Religious institutions / organisations 	1 point for every box you tick
	TOTAL SCORE		400

Annex 5: Key terminology

Audit	To conduct an official inspection of a company and its procedures and code of conduct.
Care home facilities	Facilities for the residential care of elderly or disabled people.
Code of conduct	A document which lays out the company's principles, standards, and the moral and ethical expectations that employees and third parties are held to as they interact with the organisation.
Contracting	Creating legally enforceable agreements that define and govern mutual rights and obligations among its parties, typically involving the transfer of goods, services, money.
Facilities management	The tools and services that support the maintenance of an organisation's buildings and landscape.
Grievance	An official concern, problem or complaint over something believed to be wrong or unfair.
Human trafficking	Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.
Key thematic action area	Eight themes outlined in this guide and scorecard, each relating to a particular set of actions you can take to address modern slavery in your organisation.
Modern slavery	<p>Modern slavery is the illegal exploitation of people for personal or commercial gain, including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.</p> <p>Modern slavery is a complex crime and exists on a spectrum ranging from minor labour market infringements on one end of the spectrum, all the way to grave human trafficking offences. Sections 1-4 of the MSA outline some of the offences covered by the crime.</p> <p>Examples of exploitative practices that could amount to modern slavery include:</p> <ul style="list-style-type: none"> ▪ Labour market infringement: ▪ Nonpayment of minimum wage ▪ Lack of personal protective equipment (PPE) ▪ Few or no breaks ▪ Demeaning treatment ▪ Long working hours ▪ Forced labour: ▪ Worker is controlled, forced or coerced to perform work ▪ No payment, withholding of wages or excessive wage reductions ▪ Retention of identity documents or valuable possessions ▪ Restriction of movement or confinement to the workplace ▪ Threat of denunciation to authorities (mainly illegal migrant workers) ▪ More severe forms of exploitation ▪ Human trafficking ▪ Physical violence ▪ Forced prostitution ▪ Forced begging ▪ Forced marriage ▪ Harassment

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

Annex 6: Key findings - Stakeholder interviews

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

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

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

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

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

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

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

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

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

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

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

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

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

For a full list of the questions asked during these interviews, see [Annex 3](#).

Annex 7: Key findings - Modern slavery statements

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

The majority of the statements were grouped under three categories:

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

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

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

6 out of 103 statements were ungrouped.

Main findings:

- This research shows that the **date of publishing** of these statements were inconsistent. Some statements were published in 2017, whilst others were published in 2021 and seem to be updated annually. It's unclear whether this is due to lack of knowledge about the need to publish annually or that they've been publishing voluntarily to date and therefore local authorities don't believe they need to update it regularly.
- **Misconceptions:** The common misconception was about the **purpose of the statement**. Many statements focused on section 52 (duty to notify), partnership working and safeguarding and supporting victims. There seems to be less awareness about section 54 and what the statement is actually about.
- Most statements spent this section describing the MSA and the definitions of human trafficking and slavery, without addressing **structure, business needs and supply chains**. Only 20 of the 103 statements touched on this area, although not in very much detail.

- The vast majority of the statements listed almost the exact same policies (e.g., recruitment, whistleblowing, safeguarding, employee code of conduct, agencies policy, procurement, equality and diversity). The majority of statements dedicated most attention to this section.
- **Risk assessment and mitigation:** 78 out of 103 statements do not mention risk assessments, which shows that this is an underserved area within modern slavery statements.
- 8 of 103 council statements reviewed listed their **high-risk areas**. They included:
 - Agriculture
 - Low paid service contracts (cleaning, catering security guards, care workers, gardeners)
 - Leisure
 - Hospitality
 - Construction
 - Textiles/clothing
 - IT/Electronics
 - Mined materials
 - Commercial properties
 - Housing
 - Manufacturing
 - Complex employment relationships
 - Reliance on agency workers/low-skilled or unskilled labour
- The vast majority of statements stopped at asking suppliers (within vetting, or contract management) whether they were compliant with the MSA. No further **due-diligence processes** took place.
- Only 29 of the statements attempted to provide for some sort of **effectiveness measurement**, however even those were not strong and didn't link with the provisions for safeguarding worker welfare. A handful listed **KPIs** (including NRM reports, number of people trained, or measuring against action plans). This is an area that requires more attention.
- Almost all statements had some text dedicated to **training** provision for staff (whether mandatory or not, e-learning, in person, one-off or refreshed). Only 13 out of 103 statements specify specific training for procurement staff (although no other members of staff were mentioned – e.g., HR). All other training focuses mainly on safeguarding in their community-facing roles. There is no information on how learning is assessed.

Annex 8: Acknowledgements

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

We also acknowledge the Shiva Foundation team - Cllr Meenal Sachdev, Dami Omole, Nishma Jethwa, Gabriella Jimenez, Kate Rolle and Sian Lea - for their leadership and contributions to this guide.