Modern slavery prevention checklist

Introduction

The exploitation of labour and involvement in slavery and forced labour is illegal. As an organisation you have an obligation to ensure that your recruitment and supply chain processes are robust enough to make it impossible for slavery or forced labour to be used. This checklist indentifies activities you as an organisation can take to help you accomplish this. The checklist is based on best practice in the construction and FM industries. When using the checklist you should identify which items on the list are appropriate to your organisation based on the risks that are present in your operations and in your supply chain.

As part of the Modern Slavery Act 2015 organisations with a turnover of over £36million are required by law to produce a Modern Slavery Disclosure statement. The supply chain school has published advice on the production of this statement Part 6 - Section 54 Requirements. However before writing begins it is advisable to give consideration to how you will identify and eliminate slavery and forced labour instances within your organisations and supply chain.

If your organisation falls underneath the £36million threshold it is equally important to understand The Modern Slavery Act 2015 applies to all organisations regardless of size. So you will still need to consider how you are going to respond to the requirements of the act, however you are not legally obliged to publish a statement.

This document provides guidance on what your organisation needs to do to ensure that it does not employ victims of slavery or forced labour. It also provides you with a framework to help you to take steps to reduce and mitigate against slavery and forced labour risks within your supply chain. Whilst it has been written to combat the issue of slavery and forced labour, you may also want to consider the impact other ethical labour issues have on your organisation and supply chain and apply the same thought process to these for example – what is your approach to improved labour standards, compliance with the immigration act

More information on the issues relating to modern slavery can be found at:

https://www.supplychainschool.co.uk/modern-slavery/

Guidance

When considering your actions it is advisable to consider the following when drafting your action plan:

1) Size & location of risk
2) The probability of the risk occurring, and the impact if it does
3) Leverage to influence the supply chain
4) Opportunities to improve

With this in mind the checklist below provides you with a suite of considerations that will support your approach to combating modern slavery. However your clients will want to see a response that is proportional and effective. This approach is supported by Government advice in Transparency in Supply Chains – A practical guide.

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Work Stream	Best practice
Policy	✓ Company Ethical or Human Rights policy defining the ethical principles the company will up hold with regard to its own workers and workers in its supply chain. ✓ Company recruitment policy sets out the requirement to be aware of modern slavery in recruiting staff, and that the company will not employ slaves. ✓ Supplier Code of Conduct sets out Slavery and Labour standards to be upheld by direct suppliers and in the supply chain. ✓ In all the above focus on a proportional and targeted response to slavery risks that can be incorporated within an organisational approach to other issues such as Labour Standards, Right to work, Immigration etc
Leadership & Governance	✓ The most senior management team in the company have recognised the need to address modern slavery and labour exploitation in the company's own operations and in its supply chain. ✓ Governance systems in place to monitor and prevent modern slavery and labour exploitation in the company's own operations and in its supply chain. ✓ Whistleblowing process gives guidance on reporting suspected instances of modern slavery and how to respond. ✓ Review of controls by a third party
People	✓ All staff are aware of the existence of modern slavery and the company's policy in relation to it. ✓ Staff responsible for the recruitment of low pay workers are trained in how to recognise modern slavery and what to do if they suspect its presence. ✓ Staff who work with sub-contractor and agency workers are trained in how to recognise modern slavery and what to do if they suspect its presence **Recruitment** ✓ Recruitment process includes Right to work check ✓ Checks identify highly populated addresses ✓ Payroll process includes check for multiple payments to the same bank account

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Risk & Opportunity Assessment	✓ Analysis of where the greatest likelihood of slavery is within the company's operations, and within its supply chain, including sub-contractors ✓ Maintenance of an ethical risk log that is regularly reviewed ✓ Organisation participates in a supply chain mapping process
Measurement	✓ Use of management measures that supports the evolution of a culture that does not accept and will address the risk and incidents of slavery and labour exploitation both through recruitment of direct and temporary labour and the organisations supply chain ✓ Modern slavery dashboard containing indicators of performance for own operations and supply chain
External engagement	✓ Engagement plan aimed at increasing awareness with key suppliers as well as supporting collaboration with key supply chain organisations ✓ Understanding groups, panels and think tanks operating in the labour exploitation arena and how their outputs can be utilised within the organisation and its supply chain ✓ Inclusion of modern slavery in supplier relationship meetings where there is a significant ethical risk.

Procurement Process	✓ Modern slavery is included in:
	
	    ✓ Supplier code of conduct
	
	    ✓ Category strategy – with the particular risks of the category identified
	
	    ✓ Tendering process – with specific requirements placed on the supplier when a high risk of modern slavery is present
	
	    ✓ Contract – with KPIs reflecting specific risks
	
	    ✓ Supplier meetings and contract management
	
	✓ Best practice advice on the technical aspects of the procurement process can be found at Supply Chain Sustainability School Procurement Guidance - How to embed best practice in your supply chain when combating modern slavery