

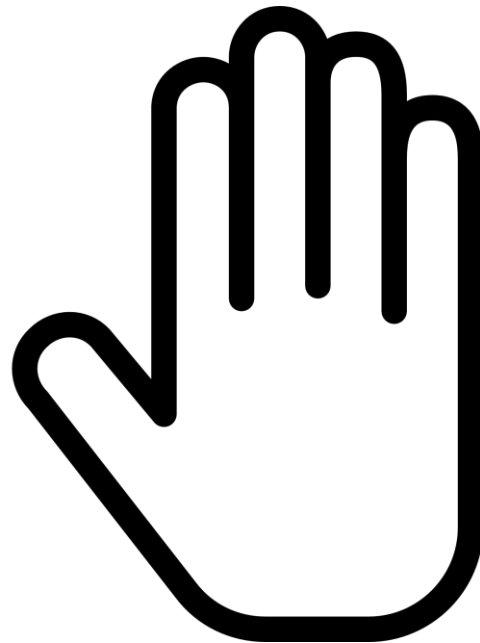
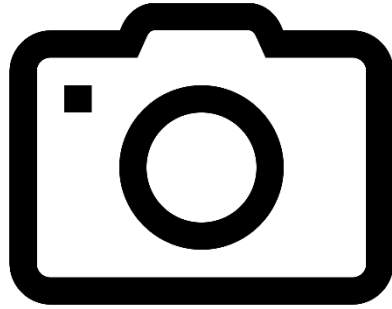
SUPPLY CHAIN SUSTAINABILITY

**SCHOOL**



## Modern Slavery an Introduction

## NEW EXPERIENCE



[www.menti.com](https://www.menti.com) /download the app





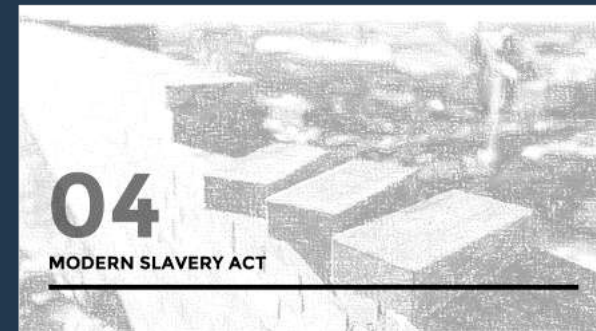
**01**  
INTRODUCTIONS



**02**  
QUIZ TIME



**03**  
MODERN SLAVERY



**04**  
MODERN SLAVERY ACT



**05**  
SPOT THE SIGNS



**06**  
DUE DILIGENCE



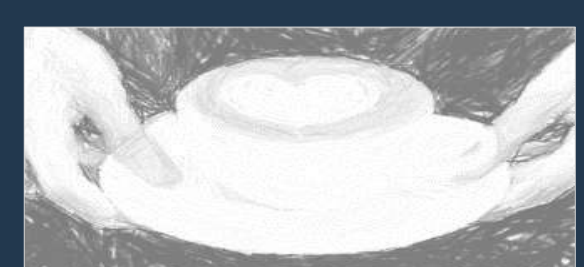
Balfour Beatty  
30  
Modern Slavery  
Katherine Rusack, Sustainable Procurement Manager



**08**  
SUPPORT



**09**  
QUESTIONS AND ANSWERS





01

**INTRODUCTIONS**

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# Helen Carter



@action\_sustain



@helenjc72



Helen@actionsustainability.com



Procurement, Sustainable Procurement, Modern Slavery, Human Rights & Ethics

Hello my name is .....

On a scale of 1 to 10 I  
would say my  
knowledge of Modern  
Slavery is...



## LEARNING OUTCOMES



### INCREASED UNDERSTANDING

Understand the current landscape of Modern Slavery and what is categorised as slavery today



### YOUR OBLIGATION AS ORGANISATIONS

Understand how the Modern Slavery Act applies to you

### RECOGNISE GOOD DUE DILIGENCE

Identify key due diligence requirements to enable your organisation to identify and respond to modern slavery



### SUPPORT

Key resources and tools that you can utilise when constructing your own response





## LEARNING LEVEL



### BEGINNER

Assumes limited and/or little knowledge of the subject. Is aimed at increasing awareness

### INTERMEDIATE



### INTERMEDIATE

Has a basic level of understanding and awareness and is looking for more detail behind the principles

**ADVANCED**  
Understands the issues and the practicalities of how to address it. Course is designed to promote best practice

## ADVANCED LEVEL

### Expert

Share best practice with peers. Knowledge activity would be more geared to discussion and sharing

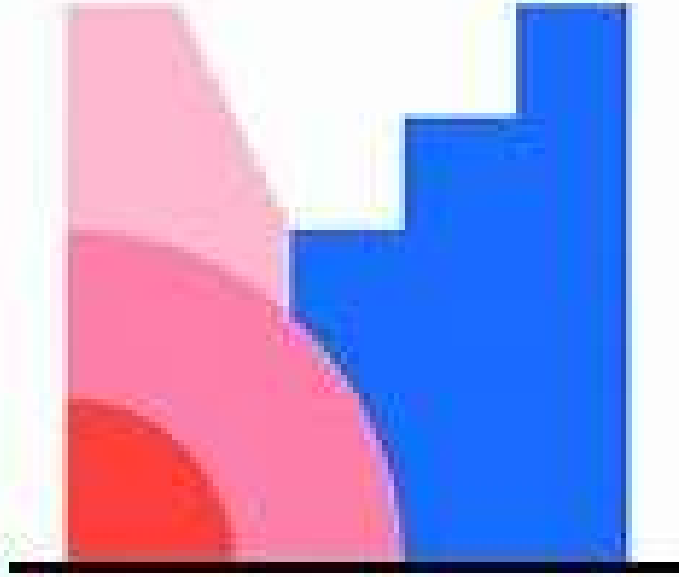


A high-contrast, black and white photograph of a person in a dark sweater with their hand raised, set against a bright background. The image has a grainy, textured appearance.

02

QUIZ TIME

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**Mentimeter**

[www.menti.com](https://www.menti.com) /download the app



# 03

## MODERN SLAVERY

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EDWARD'S  
STORY

# FORMS OF SLAVERY

HELP FREE THE UK FROM  
**MODERN  
SLAVERY**

Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they were deceived or coerced into, and cannot leave.

**MODERN SLAVERY INCLUDES:**

**SEXUAL  
EXPLOITATION**



**FORCED  
LABOUR**



**CRIMINAL  
EXPLOITATION**



**DOMESTIC  
SERVITUDE**



# Where can exploitation be found?







## Risk factors for UK construction supply chains

Pressure on costs  
and schedules

Variability in  
labour demand

A high concentration  
of migrant labour

Widespread use of agency  
and subcontracted labour

A large proportion of work  
at minimum wage level

Industry reliance  
on self regulation

a fragmented  
inspection system



# Police shut down factory after discovering 15 suspected 'slavery' victims

Child found to be working at site after public...

Adam Forrest | @adamtomforrest |



## Camdisrmo

In Phnc exploit

Laurie



by FRANCES MARTEL | 2 Mar 2020 | 2,043

# Four men charged with modern slavery after 29 people found in van

g unlawful imp...

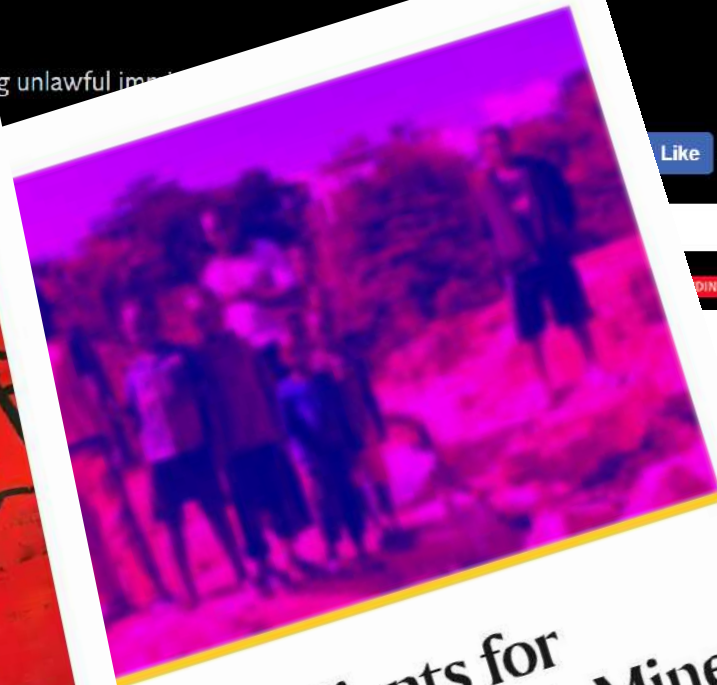
Like Click to follow The Independent

## Three victims of trafficking and modern slavery to sue Biffa

The claimants were moved from Poland to the UK and placed in work with waste firm



▲ A pre-action letter sent to Biffa by Leigh Day solicitors on behalf of the three victims states that the company has a responsibility to prevent forced labour. Photograph: Simon Newman/Reuters



## Deaths of children in Cobalt Mines

They're suing Apple, Microsoft, Dell, Alphabet, and Tesla for "extreme abuse of innocent children on a large scale."





04

**MODERN SLAVERY ACT**

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**It applies to us  
all**

**Trafficking and  
labour  
exploitation is  
illegal**

***Companies  
found guilty of  
hiring  
exploited  
labour could  
now be forced  
to pay  
compensation  
to victims***

# Government Amendments – September 2020

- ✓ Contents
- ✓ Timing
- ✓ Publication
- ✓ Approval
- ✓ Public Bodies
- ✓ Penalties for non-compliance



# Transparency in Supply Chain Guidelines



## Legal Requirements

- Signed by Directors
- Approved by the board
- Visible on website
- Completed 6 months after financial generated
- £36million turnover
- Actions taken to combat slavery



## Guidelines

- Structure and size of organisation
- Sectors of operation
- Risks within supply chain
- Policies in place
- KPI
- Grievances & remediation
- Training

Businesses' slavery and human trafficking statements must be:

- 1 APPROVED BY THE BOARD**
- 2 SIGNED BY A DIRECTOR**
- 3 AVAILABLE ON THE COMPANY'S WEBSITE**

HELP FREE THE UK FROM MODERN SLAVERY

**TACKLING MODERN SLAVERY**

- provides opportunities for industry collaboration
- promotes the values of your business
- protects vulnerable workers

**FIND OUT MORE ON GOV.UK**

HELP FREE THE UK FROM MODERN SLAVERY

Businesses can find information and guidance on producing a

**SLAVERY AND HUMAN TRAFFICKING STATEMENT**  
on **GOV.UK**

HELP FREE THE UK FROM MODERN SLAVERY



05

**SPOT THE SIGNS**

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# Modern slavery

## Know the signs

### APPEARANCE



- Signs of physical or psychological abuse
- Look malnourished or unkempt
- Appear withdrawn

### POSSESSIONS



- Have no travel documents / passports
- Few or no personal possessions
- Always wear the same clothes
- Clothes not suitable for their work

### ISOLATION



- Restricted freedom of movement
- Rarely allowed to travel alone
- Seem under control / influence of others
- Rarely interact

### TIME



- Unusual travel times
- Dropped off / collected for work on a regular basis, either very early or late at night
- Work excessive hours

### LIVING CONDITIONS



- Living in dirty, cramped or overcrowded accommodation
- Living and working at the same address

### MANNER



- Reluctance to seek help
- Avoid eye contact
- Appear frightened or hesitant to talk

# Practicalities of managing PV's:



Gangmasters &  
Labour Abuse Authority

- ✓ Take the victim to a place of safety where they feel comfortable to disclose
- ✓ Access to food and drink, warm clothing, somewhere to sleep
- ✓ Separate potential suspects from victims and speak to victims individually
- ✓ Keep multiple victims separate
- ✓ Assess and provide any medical / mental health needs.
- ✓ Try to dispel any fears of law enforcement agencies, establish trust / rapport.
- ✓ Be aware of the effects of PTSD
- ✓ Make enquiries at an early stage to establish if you have other potential victims residing at the same address/ working at the same site
- ✓ Think forensic opportunities and seize identity documents, travel documents, financial information and retain and preserve any documentation that may be required for any subsequent court hearing
- ✓ Make notes of discussions / actions
- ✓ Give the victim as much information as you can
- ✓ If you suspect you have a victim of human trafficking inform the police or the GLAA



06

**DUE DILIGENCE**

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# What is Due Diligence

Reasonable steps taken by a person to avoid committing a tort or offence (*Oxford English Dictionary*)

*Mandatory due diligence laws put the onus on companies to demonstrate that they are taking all necessary measures to identify, prevent and mitigate incidences of modern slavery in their operations and supply chains (Business and Human Rights Centre)*

*Find and Fix – Chris Harrop – Marshalls*

**Not Confirmation of zero slaves**

# ORGANISATIONAL DUE DILIGENCE

- ✓ Accountability & Responsibility
- ✓ Training
- ✓ Measurement/Reporting
- ✓ Risk Assessment/Due Diligence
- ✓ Stakeholder Engagement/Communication
- ✓ Supply Chain/Procurement
- ✓ Grievance & Remediation



# Modern Slavery

Katherine Rusack, Sustainable  
Procurement Manager



## Areas of Risk

1. Our own employees
2. Materials supply chain produced in, or using suppliers from, high risk countries
3. Use of subcontractor workers on our projects
4. Use of labour agencies



### **Modern Slavery and Labour Exploitation**

Guidance and Requirements for Suppliers

Balfour Beatty UK  
August 2019

## Mitigating Risks

Key risks	Mitigation
Own employees	<ul style="list-style-type: none"><li>• Face-to-face Right to Work checks</li><li>• Reference checks for 2 years of employment</li><li>• Bank account must be in worker's name or next-of-kin</li></ul>
Materials supply chain	<ul style="list-style-type: none"><li>• Modern Slavery Statement</li><li>• Details of sourcing from high risk countries of origin</li><li>• Details of audits</li></ul>
Subcontractors	<ul style="list-style-type: none"><li>• Modern Slavery Statement</li><li>• Right to Work checks</li><li>• Have a contract of employment</li></ul>
Labour agencies	<ul style="list-style-type: none"><li>• Paid at least minimum/living wage</li><li>• Do not have wage deductions</li><li>• Informed of statutory rights</li><li>• Working hours monitored</li></ul>



# Sustainability Heatmapping

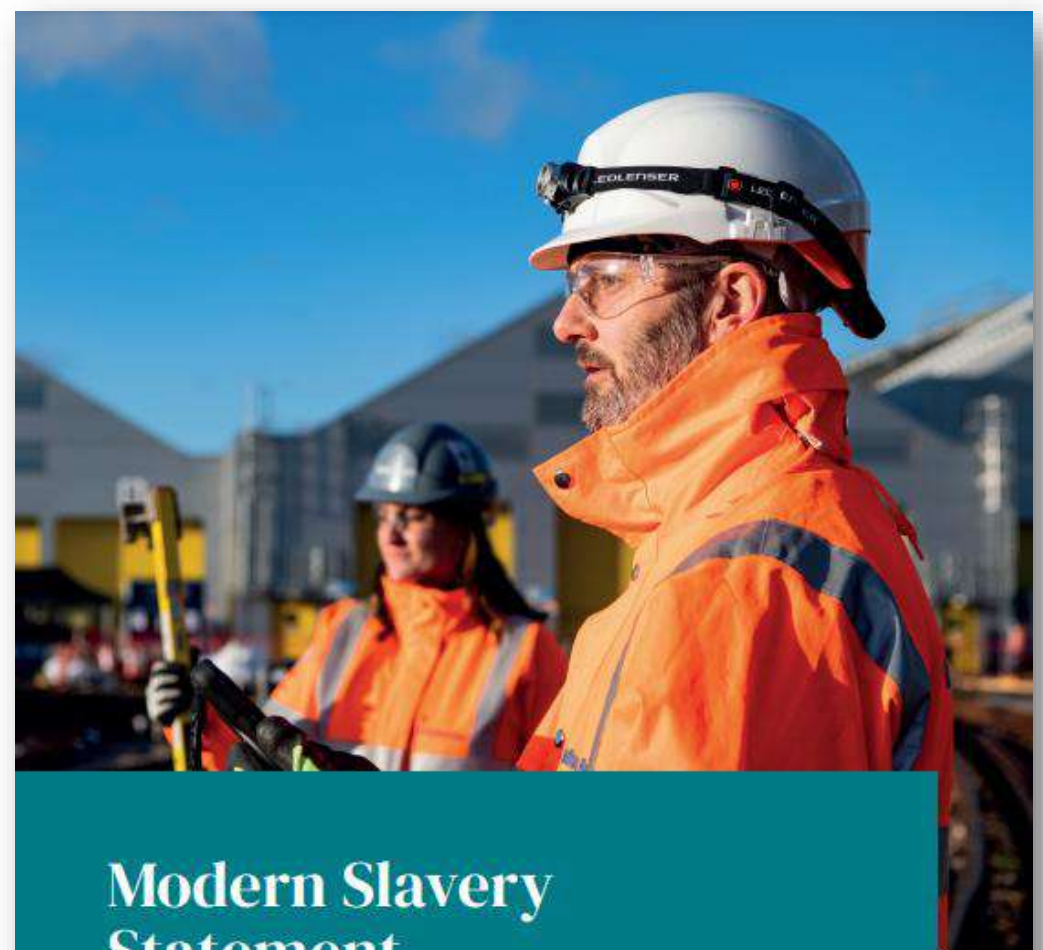
- Identification of risks for on-site labour and supplier labour
- Helps us to ask relevant and proportionate questions to our supply chain
- Integrated into e-Procurement tool
- During 2021 we have made it mandatory for any organisation participating in a tender to provide a modern slavery statement

Category	Environmental							Social						Economic	
	Ethical Sourcing	Circular Economy	Environ. Mgt	Energy & Carbon	Water	BioDiversity	Air Quality	Supplier Diversity		Developing talent	Labour Standards		Community Engagement	Payment	SC Development
								Supply chain diversity	Workforce diversity		High-risk country for Labour Standards	UK Labour Provider			
Construction	Low	Low	Low	Low	Low	Low	Low	Low	Low	Low	Med	Low	Low	High	High
Consumables	Low	Low	Low	High	Low	Low	High	Low	Low	Low	Med	Low	Low	High	High
Decomissioning	Low	Low	High	Low	Low	Low	Low	Low	Low	Low	Med	High	High	High	High
Design Services / Support	Low	Low	Low	High	Med	Low	High	Low	Low	Low	Low	Low	Low	High	High
Engineering	Low	Low	High	High	Med	Low	High	Low	Low	Low	Low	High	High	High	High
FM	High	High	Med	High	Med	Med	Low	Low	Low	Low	Med	Low	Low	High	High
Hazardous Material Removal	High	Med	Med	Med	Med	Low	Low	Med	Low	Low	High	Low	Low	High	High
Health & Safety	High	Med	High	Med	Med	Low	Low	Med	Med	Med	High	High	High	High	High
IT	Low	Low	Low	Low	Low	Low	Low	Low	Low	Med	Low	Low	Low	High	High
Maintenance	Low	Low	High	Low	Low	Low	Low	Low	Med	Med	Low	High	High	High	High
Manpower / Labour	High	Med	Low	Low	Low	Low	Low	Med	Low	Low	Med	Low	Low	High	High
Plant & Equipment	High	Med	High	Low	Low	Low	Low	Med	Low	Low	Med	High	High	High	High
R&D	Med	Low	Med	Low	Med	Low	Low	Low	Low	Med	Low	Low	Low	High	High
Remediation & Environmental Services	Med	Low	Med	Low	Med	Low	Low	Low	Low	Med	Low	Low	Low	High	High
Support Services	Med	Low	Med	Low	Med	Low	Low	Low	Med	Med	Low	High	Low	High	High
Transport & Materials	Med	Low	High	Low	Med	Low	Low	Low	Med	Med	Low	High	High	High	High
Utilities	High	Med	Med	High	High	Med	Low	Med	Low	Low	Low	Low	Low	High	High
Waste Management & Disposal	High	Med	High	High	High	Med	Med	Med	Med	Med	Low	High	High	High	High

Example of Sustainability Heatmapping

# Modern Slavery Statement

- Used the ETI's Modern Slavery Statement Framework
- Requires a cross functional team to pull together all data and activities
- Reviewing and integrating your processes and systems helps to identify gaps and areas for improvement
- Being honest with your progress will lead you to have a better system in place long-term



## Modern Slavery Statement

2020-21

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# Modern Slavery Working Group

- 2021 refreshed the Working Group
- Board representation in the Working Group
- Aligned to ensure all business areas represented in the group
- Reclarification of expectations
- Help to identify risks which are specific to one area of the business

## Purpose

- I. To provide governance to Balfour Beatty's approach to mitigating and managing modern slavery risks in our business and supply chain
- II. To support the operationalisation of new systems, methods, communications, and training to mitigate modern slavery risks in our business and supply chain
- III. To provide support for the development of the annual Modern Slavery Statement, before it is shared with the Balfour Beatty Group Board for sign-off.

# Site Awareness

Creating awareness at site level of how to get support if you see something that doesn't look right

Toolbox talks including signs of modern slavery



# Are you alright?



If you, or anyone you know, wants advice or more information, please contact us for help.

### Contact us in confidence

BalfourBeattySpeakUp.com Whistle blowing helpline: 0800 028 0822

### Additional helplines

1 slavery helpline: 0800 0121 700 (24 hours)

Trades and Labour Abuse Authority: 0800 432 0804 (Monday to Friday 9:00 – 17:00)

**Unseen**  
Recognise & Report Slavery



Trades and Labour Abuse Authority

Working with construction

**Balfour Beatty**

# Speak Up.

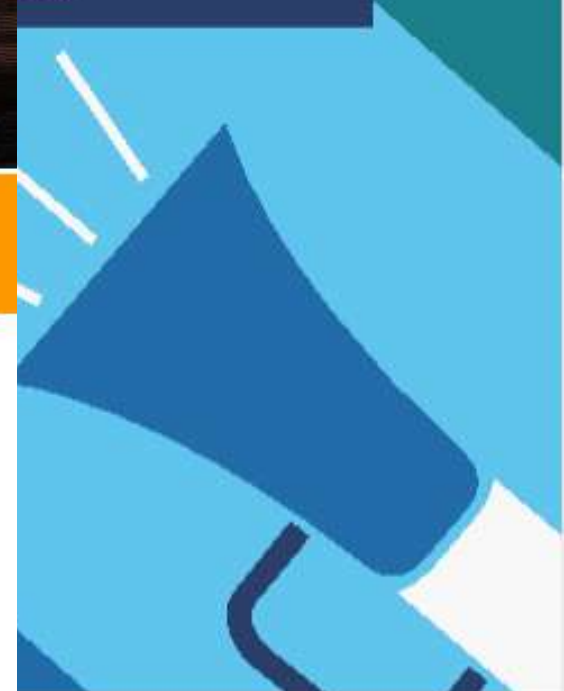
...doing the right thing.

...honest or unacceptable aware of it.

...or site supervisor first or of the HR, Ethics or Legal team

...Speak Up, our whistleblowing

...com



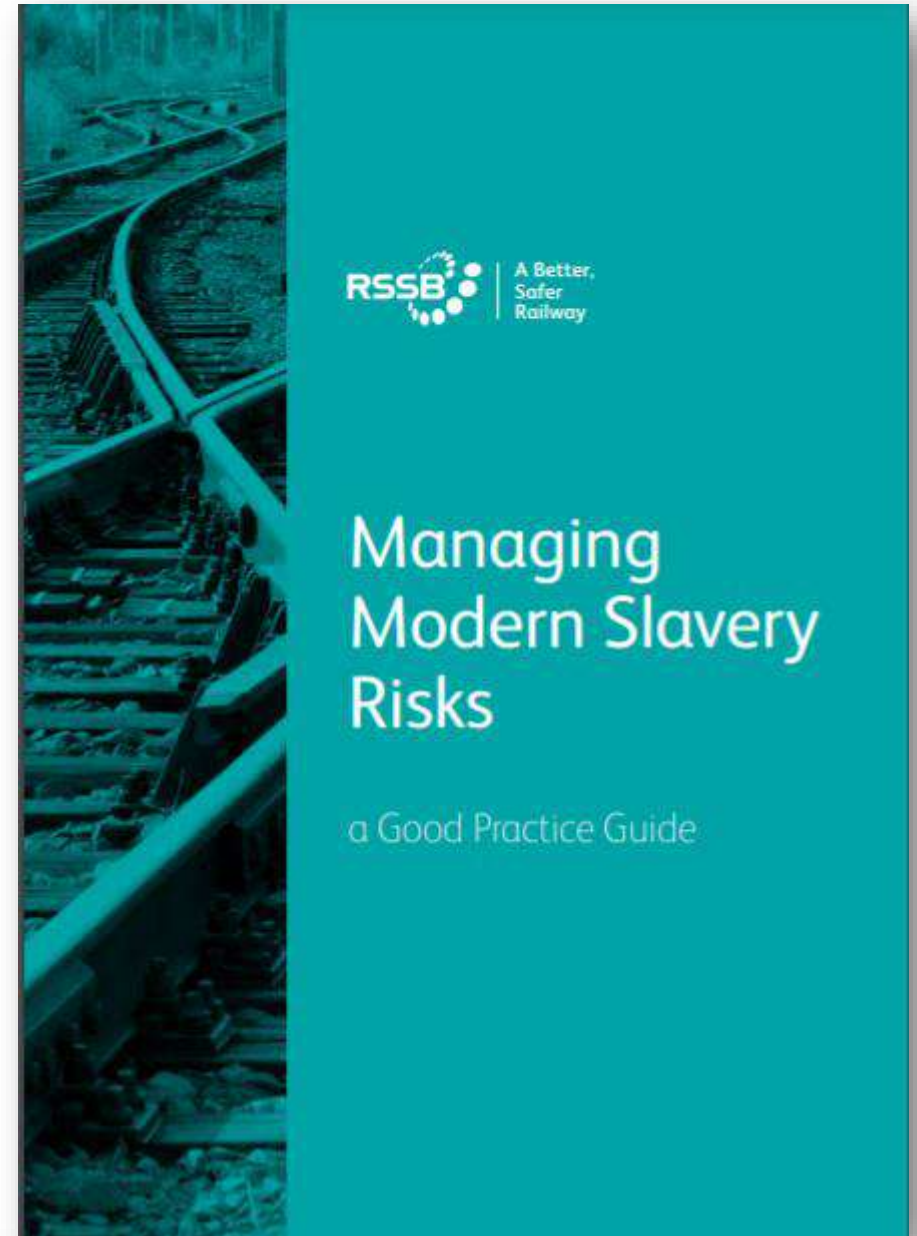
## Site Worker Checks

- Implementing checks to ensure workers are who they say they are
- Passport validation using tool developed by PpAC
- Checks for authentication of documents
- Modern slavery is a health and safety risk as well as a human rights risk



## Industry Collaboration

- Working with industry initiatives to develop and learn from best practice
  - Gangmaster and Labour Abuse Authority's Construction Protocol
  - RSSB Modern Slavery Working Group



# Remain Informed

- The landscape is constantly changing and new risk areas emerging.
- Xingjang region in China become prominent in last two years for human rights abuses
- At first linked to cotton and textiles industries
- Now link to technical industries such as solar panels
- Conduct checks with associated industries

## UK business 'must wake up' to China's Uighur cotton slaves

🕒 16 December 2020



UK businesses must investigate where they get their cotton to avoid buying material grown by slave labour, according to a member of an influential

## Top Tips

- Embed modern slavery checks into the main systems you use so it isn't a separate check
- Work with your data protection team to support you when you're looking to make changes to modern slavery processes
- Data protection isn't a reason not to be able to conduct modern slavery checks
- Rather than storing data (e.g. copy of passport) and focus on indicating the check has been conducted
- Develop FAQ documents to help workers/ employees know what is expected of them during checks
- Remain clear on your focus – modern slavery checks are different to Right to Work checks





**Q&A**





08

**SUPPORT**

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# Supply Chain Sustainability School Resources

## New modern slavery resources

We have recently launched three new resources to help you mitigate slavery on site. Take a look:



**MODERN SLAVERY**  
Modern Slavery Due Diligence Prevention Checklist

**DOCUMENT / PRESENTATION**



**MODERN SLAVERY**  
Setting Up Your Site to Combat Modern Slavery

**DOCUMENT / PRESENTATION**

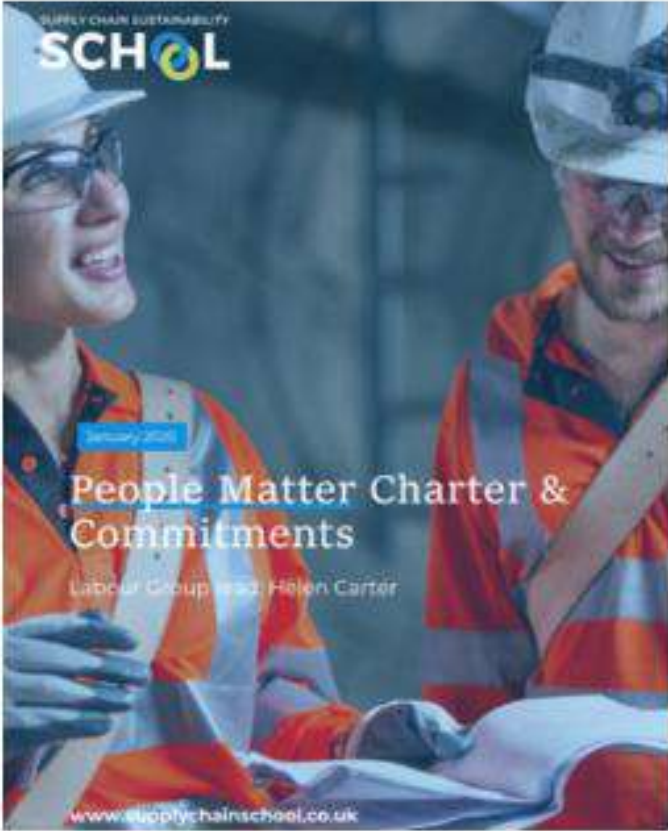


**MODERN SLAVERY**  
Modern Slavery Statement Evaluation Criteria

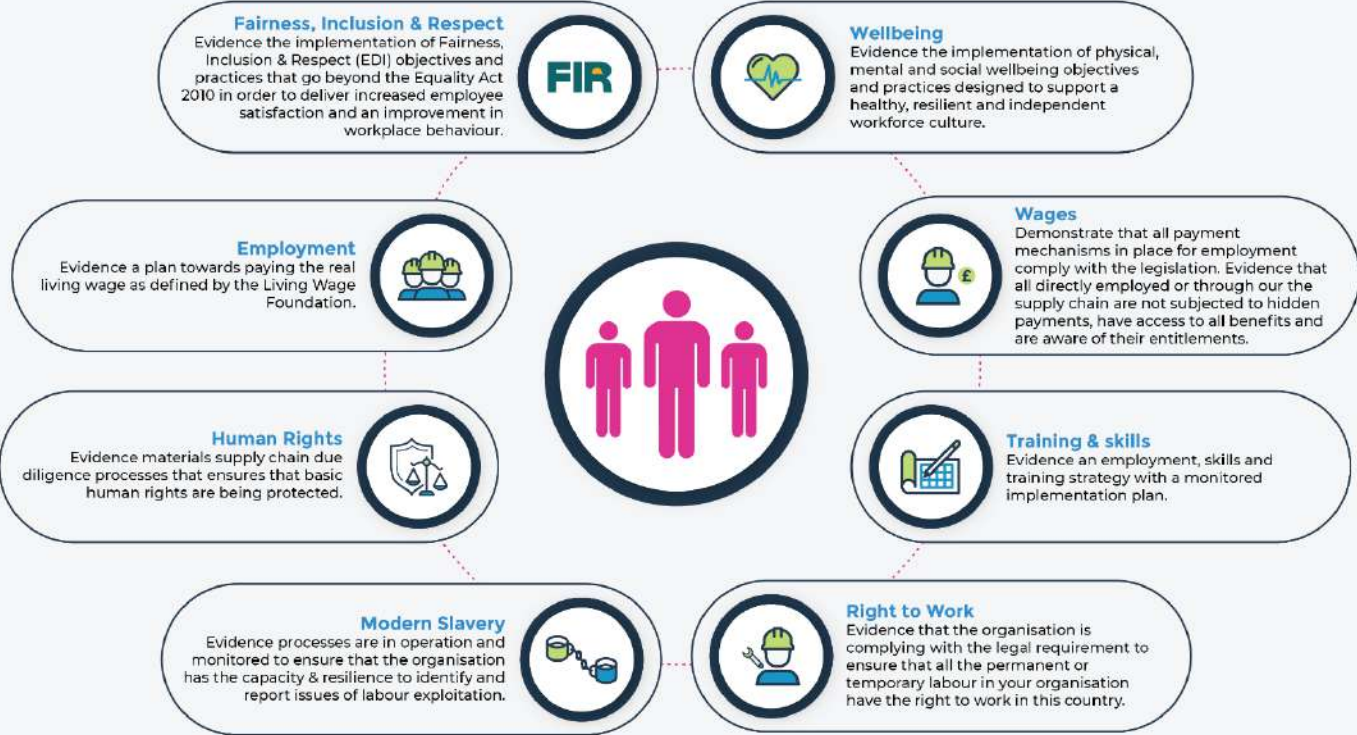
**TOOL**

# People Matter Charter

<https://www.supplychainschool.co.uk/partners/groups/labour-group/people-matter-charter/>



## People Matter Charter: The Eight Commitments

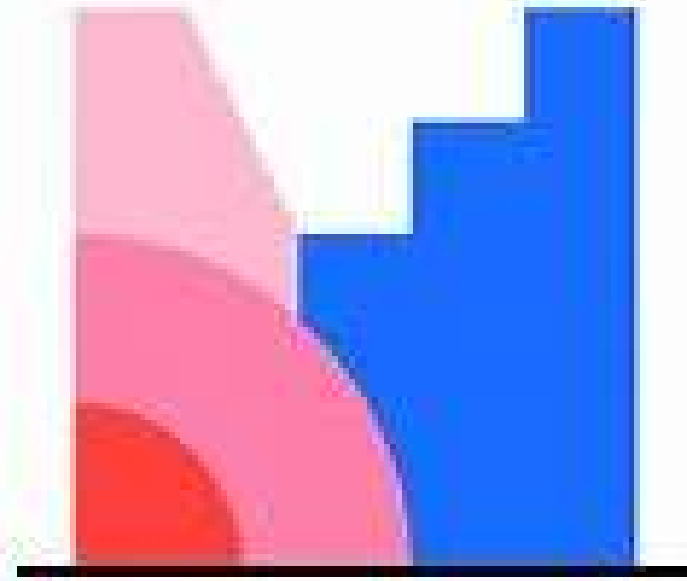




**09**

**QUESTIONS AND ANSWERS**

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**Mentimeter**

[www.menti.com](https://www.menti.com) /download the app

# Questions



AN Unchosen FILM

..... Films Against Slavery





thank you!



E-mail: [helen@actionsustainability.com](mailto:helen@actionsustainability.com)

<http://www.supplychainschool.co.uk/modern-slavery/>

