

National Highways

Modern Slavery

Oct 22



National Highways Commitment

National Highways abides by the Modern Slavery act 2015 and has both a Policy and Statement which are available online. We are also fully committed to doing business in a responsible and sustainable way and will do all that we can to prevent any form of modern slavery in any part of our business and those businesses we work closely with.

We expect our colleagues, customers and suppliers to share and uphold these ethical values and principles.

It won't happen to us.....

Modern Slavery is happening now. We all have a responsibility to ensure that everyone that works for has good working conditions.

Civil litigation is increasing and reports of Modern Slavery are on the rise, in 2021 the construction industry accounted for more than 20% of reported incidences.

Reasons for labour abuse in the construction industry

There are many reasons why labour abuse and exploitation occur in the construction sector. The charity Unseen has determined these include:

Widespread use of sub-contracted labour and high turnover of workers. This can make it difficult for the actual employer to ensure workers are being paid correctly and are not working under duress.

Pressure on costs and schedules, which can push employers into cutting corners.

Long, complex supply chains which inhibit transparency and can create a culture of disinterest and a lack of accountability.

A large proportion of workers on the minimum wage

Variability in labour demand and associated job insecurity.

SUPPLY CHAIN SUSTAINABILITY

SCHOOL



Modern Slavery: an Introduction

Emma-Jane Allen (EJ)



@action_sustain



Emma-jane@actionsustainability.com



Consultant / trainer (modern slavery, human rights, social value)

Sector Manager (Construction) – Supply Chain Sustainability School

Please participate!



Please turn off
microphones, but
leave your cameras
on



If you have a
question use the
raise your hand
function



Join in with the
group
discussions in
breakout rooms



SLIDES will be
distributed
afterwards



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 to help with your response





01

INTRODUCTIONS



www.menti.com

Code: 6772 6815

A grayscale, high-contrast photograph of a person with their hand raised, set against a background of a window and a landscape. The person is in the foreground, with their hand raised towards the top of the frame. The background shows a window with a view of a landscape, possibly a body of water and distant hills. The overall tone is dramatic and artistic.

02

QUIZ TIME

EDWARD'S
STORY

An aerial, black and white photograph of a landscape featuring a prominent grid pattern of rectangular plots, likely agricultural fields or a planned settlement. The terrain is uneven, with some areas appearing more elevated or eroded. The overall texture is grainy, suggesting a high-contrast or low-resolution image.

03

MODERN SLAVERY

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**



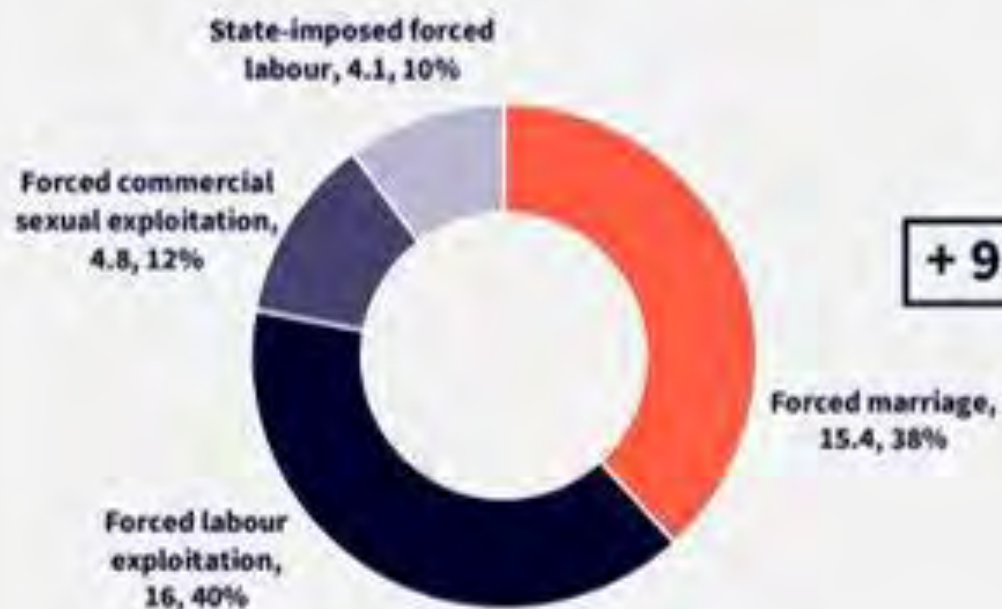
**DOMESTIC
SERVITUDE**



GLOBAL ESTIMATES OF MODERN SLAVERY

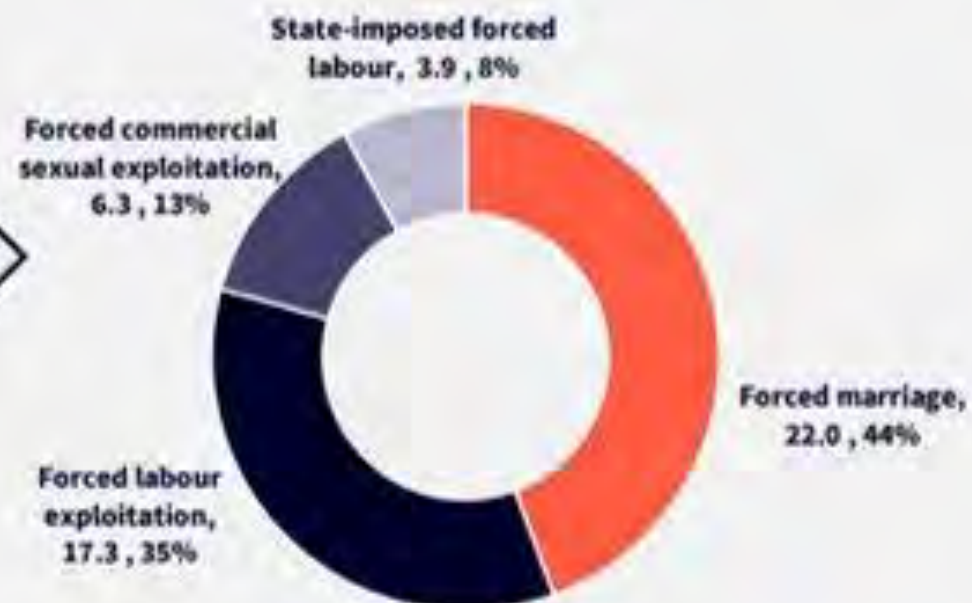
The total number of people in forced labour **increased by 9.3 million** between 2016 and 2021.

2016



+ 9.3 million

2021



Number (in millions) and percentage distribution of people in forced labour, by form of forced labour





Where can exploitation be found?





'Modern slavery' cases in Cumbria could be rising, figures suggest

CRIMINALLY exploited children are among more than 80 suspected victims of modern slavery identified in Cumbria in just over five years, we can reveal.

Report reveals more than 100,000 people suffering under modern slavery in the UK

CRIMINAL gangs running modern slavery networks are costing the economy £33billion a year, a shocking report reveals today. More than 100,000 men, women and children, one-third of them British citizens, are being held as slaves at the moment, it is estimated.

By **ROBERT KELLAWAY**
22:01, Mon, Jan 31, 2022 | UPDATED: 09:54, Tue, Feb 1, 2022



14



News > UK News

SLAVE IN A SHED University lecturer, 56, and husband arrested for 'keeping slave in garden shed of their £1.2m home for four years'

Rooney traveller family jailed for modern slavery offences

© 12 September 2017



Lincolnshire Police
The Rooney family ran a driveway resurfacing business



SLAVERY SURVIVOR FEARED CAR WASH GANG WOULD KILL HIM

A Slovakian man tricked into modern slavery, and then threatened with murder by people he trusted, is now living safely...



TRAFFICKING SURVIVOR STUDIES LAW TO HELP OTHERS

A young man trafficked to the UK as part of an arranged marriage, says he is determined to help others...

UK slavery network 'had 400 victims'

© 5 July 2019



West Midlands Police
Top L-R: Ignacy Brzezinski, Jan Sadowski, Julianna Chodakowicz, Justyna Parczewska. Bottom L-R: Marek Brzezinski, Natalia Zmuda, Wojciech Nowakowski, Marek Chowaniec

How I 'bought' slave labour in London: An undercover investigation



Forced child labour picking cotton



Children making surgical instruments



Workers on fishing vessels



Young women working in spinning mills

Migrant workers in rubber glove factories



Migrant construction workers



Seasonal migrant labour



Syrian refugees in garment factories

Solar Panels Piling Up at US Border on Xinjiang Forced Labor Law

WORLD | ENVIRONMENT | TRADE | ASIAN AFFAIRS | NATIONAL POLICY DEBATE



Cambodia's construction boom is a display of how the west profits from modern slavery

In Phnom Penh, modernisation has been fuelled by forced adult and child labour – just one example of how exploitation is embedded in systems of global commerce and growth.

Lawrence Powell | World Energy | 20 November 2018 | 11



STUDY: NIKE, APPLE, BMW AMONG 83 BRANDS USING CHINESE MUSLIM SLAVE LABOR



By FRANCIS MARTEL | 14 Nov 2018 | 1:42



20 January

Families Sue Tech Giants for 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."

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 group action letter sent to Biffa by Leigh Day solicitors on behalf of the three victims claims that the company has a commitment to its employees and customers. Photo: iStock.com, iStock.com, iStock.com

Government to face court hearing over links to PPE supplier accused of modern slavery

The government is facing legal action over its decision to continue using Supermax as a supplier of disposable gloves for NHS workers

Samuel Lovell | Daily News Correspondent | 4 days ago



EXCLUSIVE EU aims to ban products, imports made with forced labour



US ban on imports from China's Xinjiang region takes effect

By Anabelle Liang

Business reporter

10/11/2021





04

MODERN SLAVERY ACT



Modern Slavery Act 2015

It applies to us all

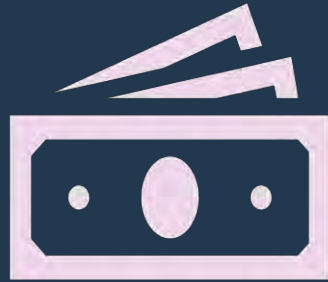
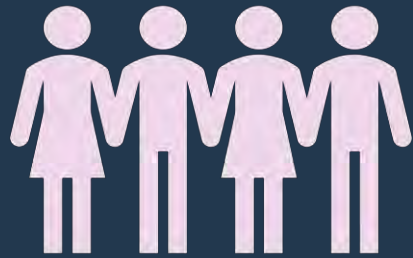
Trafficking and labour exploitation is illegal

Companies using exploited labour could now be forced to pay compensation to victims

The Modern Slavery Act 2015

Part 1	Part 2	Part 3	Part 4	Part 5	Part 6	Part 7
Offences	Preventative Orders	Enforcement for Ships	Anti Slavery Commissioner	The Statement	Protection of victims	The role of the GLA

Transparency in Supply Chains



Legal Requirements

- Signed by Directors
- Approved by the board
- Visible on website
- Completed 6 months after financial report 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

GOV.UK Modern slavery statement registry Sign in

BETA This is a new service - your [feedback](#) will help us to improve it.

See what organisations are doing to tackle modern slavery

Use the Modern slavery statement registry to find or add statements. See what organisations are doing to eliminate modern slavery from their operations and supply chains.

[Find statements](#) or [add a statement](#)

Government Amendments – coming soon...

- ✓ Mandates content of a statement
- ✓ Uniform reporting period (April – March) & reporting deadline (30 Sept)
- ✓ Publishing statements
- ✓ Date of Board approval
- ✓ Public Bodies (budget of £36m+)
- ✓ Penalties for non-compliance



See what organisations are doing to tackle modern slavery

Use the Modern slavery statement registry to find or add statements. See what organisations are doing to eliminate modern slavery from their operations and supply chains.

[Find statements >](#)

or [add a statement](#)

Modern Slavery Analysis

Modern Slavery Statement Analysis (2021)

In 2021, Supply Chain Intelligence undertook an analysis of 53 strategic suppliers and their published Modern Slavery Statements.

The analysis highlighted some key risk areas which included:

- There may be limited knowledge of the extended supply chain via mapping or similar approaches,
- Modern Slavery is often covered under umbrella policies or Codes of Conduct. Based on our findings we created an action plan to reduce risk, ensure our own compliance and improve how we work collaboratively with our supply chain.

The ambitious 22/23 statement overarching **6 themes** set the standard backed up by our Action Plan

Our ambitious 22/23 MS statement's **6 themes** have set the National Highways standard which is backed up by our Action Plan.

The themes are:

- Collaborate with the DfT group to promote a culture of learning and sharing best practice
- Improve measurement and benchmark against best practice.
- Strengthen the supply chain through engagement and collaboration
- Continue to drive learning and development
- Develop ways of utilising data from supply chain to drive improvement and manage risk
- Empower our colleagues








Modern Slavery Assessment Tool

The MSAT is a modern slavery risk identification and management tool. This tool has been designed to help public sector organisations work in partnership with suppliers to improve protections and reduce the risk of exploitation of workers in their supply chains. It also aims to help public sector organisations understand where there may be risks of modern slavery in the supply chains of goods and services they have procured. Public sector organisations are encouraged to use the MSAT with existing suppliers.



Corporate due diligence laws and legislative proposals in Europe

Comparative table | June 2021

							
	<u>EUROPEAN PARLIAMENT DUE DILIGENCE RESOLUTION</u>	<u>FRENCH DUTY OF VIGILANCE LAW</u>	<u>GERMAN SUPPLY CHAIN LAW</u>	<u>NORWEGIAN TRANSPARENCY LAW</u>	<u>DUTCH RESPONSIBLE BUSINESS CONDUCT BILL</u>	<u>AUSTRIAN SUPPLY CHAIN BILL</u>	<u>BELGIAN DUTY OF VIGILANCE BILL</u>
STATUS	<ul style="list-style-type: none"> Proposal (European Parliament) 	<ul style="list-style-type: none"> In force 	<ul style="list-style-type: none"> Adopted but not yet in force (2023) 	<ul style="list-style-type: none"> Adopted but not yet in force 	<ul style="list-style-type: none"> Proposal (political parties) 	<ul style="list-style-type: none"> Proposal (political party) 	<ul style="list-style-type: none"> Proposal (political parties)
NATURE	<ul style="list-style-type: none"> Company law Civil law International private law 	<ul style="list-style-type: none"> Company law Civil law 	<ul style="list-style-type: none"> Administrative law; with implications for Company law Civil law 	<ul style="list-style-type: none"> Company law Consumer law 	<ul style="list-style-type: none"> Company law Civil law Criminal law 	<ul style="list-style-type: none"> Company law Civil law Criminal law 	<ul style="list-style-type: none"> Company law Civil law Criminal law International private law
SCOPE	<ul style="list-style-type: none"> Large companies, listed SMEs and SMEs in high-risk sector, domiciled or delivering products or services in the EU 	<ul style="list-style-type: none"> Large companies based in FR (>5,000 employees) 	<ul style="list-style-type: none"> Large companies (incl. foreign ones with a DE office) based in DE (>3,000 employees; thereafter from 2024, >1,000 employees) 	<ul style="list-style-type: none"> All companies with >50 employees domiciled or delivering products or services in NO 	<ul style="list-style-type: none"> All companies with >250 employees domiciled in or operating in NL (general duty of care for all firms operating in NL) 	<ul style="list-style-type: none"> All companies delivering products or services in AT (above a certain turnover to be defined) 	<ul style="list-style-type: none"> All companies domiciled or operating in BE Only large companies (≥ 250 employees) are subject to certain obligations
STANDARDS	<ul style="list-style-type: none"> Human rights Environment Governance 	<ul style="list-style-type: none"> Human rights Health and safety Environment (FR international commitments) 	<ul style="list-style-type: none"> Human rights Environment (Stockholm, Minamata and Basel conventions) 	<ul style="list-style-type: none"> Human rights Working conditions 	<ul style="list-style-type: none"> Human rights Environment (incl. climate) 	<ul style="list-style-type: none"> Human rights Environment 	<ul style="list-style-type: none"> Human rights Labour rights Environment
DUE DILIGENCE OBLIGATIONS	<ul style="list-style-type: none"> Due diligence (DD) (UNGP/OECD-based) 	<ul style="list-style-type: none"> Due vigilance (DV): establish and implement an annual vigilance plan (UNGP-based) 	<ul style="list-style-type: none"> Due diligence (DD) (partially UNGP/OECD-based) 	<ul style="list-style-type: none"> Due diligence (DD) (OECD-based) Duty to know of salient risks (all companies) 	<ul style="list-style-type: none"> Due diligence (DD) (OECD-based) 	<ul style="list-style-type: none"> Due diligence (DD) (UNGP/OECD-based) 	<ul style="list-style-type: none"> Due diligence (DD): all companies must conduct DD Due vigilance (DV): large companies must



05

SPOT THE SIGNS

What signs should you lookout for?

What methods do controllers use?







Modern slavery

Know the signs



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



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



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



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



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



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



CrimeStoppers.
Speak up. Stay safe.



**Gangmasters &
Labour Abuse Authority**



**modern slavery
& exploitation
helpline**
08000 121 700

The Police - 101, or 999 in emergency

Crimestoppers - 0800 555 111

***The GLAA - 0800 432 0804 or 03000
718234 (outside office hours)***

Modern Slavery Helpline - 0800 012 1700

**UK Human Trafficking Centre - 0844 778
2406**

The Salvation Army - 0300 303 8151

Practicalities of managing potential victims:

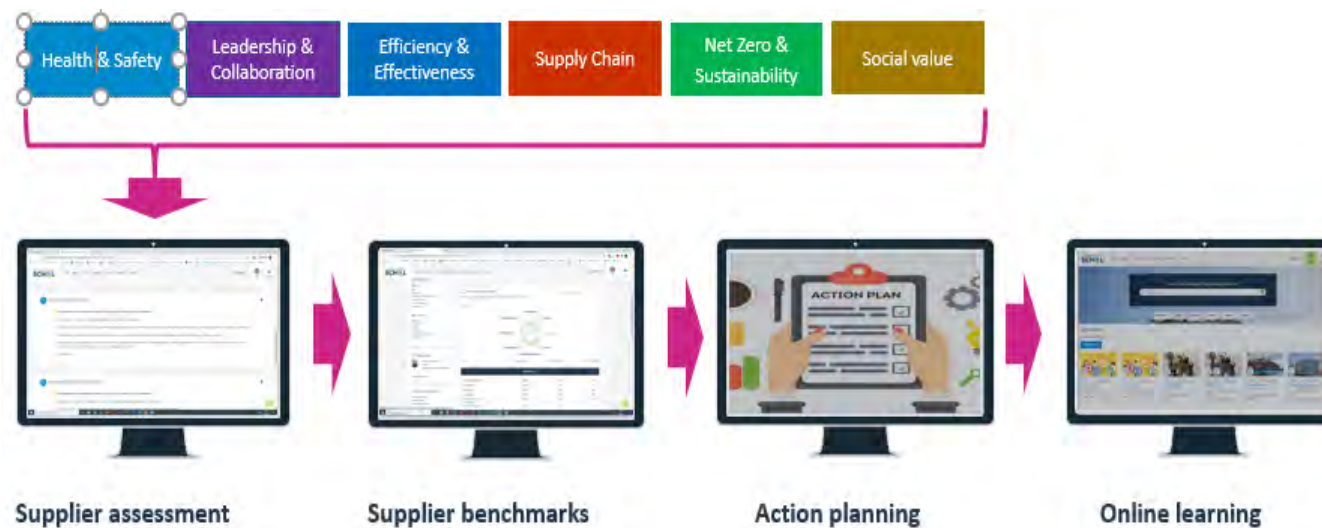
- ✓ Take the victim to a place of safety where they feel comfortable to disclose
- ✓ Access to food and drink, warm clothing, somewhere to sleep
- ✓ Separate potential suspects from victims and speak to victims individually
- ✓ Keep multiple victims separate
- ✓ Assess and provide any medical / mental 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




**Gangmasters &
Labour Abuse Authority**

Supply Chain Sustainability School

- In February 2020, National Highways upgraded to a partnership membership of the Supply Chain Sustainability School
- National Highways has used their partner contribution to the school to set up two Learning Pathways for the Highways Sector which can provide core knowledge across all programmes. Core subjects include Modern Day Slavery, Ethics, Equality, Diversity, Inclusion, Social Value, Carbon, Sustainable Procurement, Counter Fraud (In development) and Waste,
- Suppliers and delivery partners are invited to use the Learning Pathways for free, to provide strategic alignment and create recommended online education for teams involved in different programmes of work.





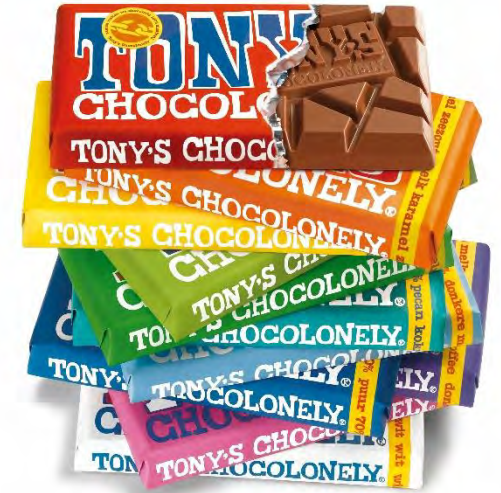
06

DUE DILIGENCE

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*

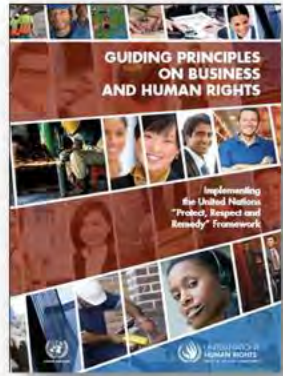
NOT CONFIRMATION OF ZERO SLAVES



1,700 illegal child labour
Remediated 366



21,258 child workers
Eradicate all child labour by 2025



1. Policy commitment

5. Remediate adverse impacts

2. Assess actual and potential impacts (Human rights risk assessment)

4. Track and communicate performance

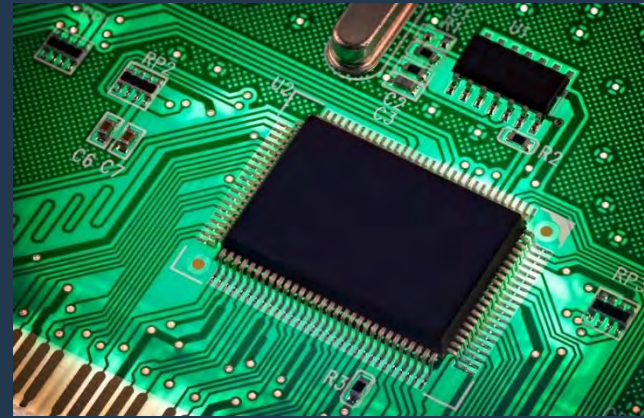
3. Integrate findings and potential impacts



IMPLEMENTATION CONSIDERATIONS....

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





High risk categories



The background of the slide features a grayscale photograph of a construction site. Several workers are silhouetted against a bright, hazy sky, likely during sunrise or sunset. The workers are engaged in various activities: some are standing, one is using a tool, and others are crouching or kneeling. The overall scene conveys a sense of active labor and teamwork.

07

SUPPORT

Learning pathways



Modern Slavery: An Introduction

This self-enrol learning pathway is designed to increase your understanding of modern slavery risks within your organisation and within your supply chain. It is the perfect place to start if you want to understand the principles of modern slavery and how you can use due diligence within your organisational processes to combat the risk of labour exploitation. To achieve the badge for this learning path, you must complete each resource.

[VIEW PATHWAY >](#)



Modern Slavery: Site Set-Up

This self-enrol learning path is designed to increase your understanding of modern slavery risks, to help your understanding in terms of spotting signs of victims of exploitation and outline what to do to set up construction sites to manage this issue. To achieve the badge for this learning path, you must complete each resource.

[VIEW PATHWAY >](#)



Modern Slavery: Due Diligence

This self-enrol learning path contains resources designed to build on your basic knowledge of modern slavery and delve deeper in due diligence within organisations and supply chains. To achieve the badge for this learning path, you must complete each resource.

[VIEW PATHWAY >](#)

Learning pathways



Modern Slavery: Site Set-Up

This self-enrol learning path is designed to increase your understanding of modern slavery risks, to help your understanding in terms of spotting signs of victims of exploitation and outline what to do to set up construction sites to manage this issue. To achieve the badge for this learning path, you must complete each resource.

LEVEL 1

Allocated Tuesday, 2 February 2021, 12:46 PM

This learning pathway is achieved when all resources marked required are complete



MODERN SLAVERY

Concrete - Tackling Modern Slavery in the Construction Sector

VIDEO

INTERMEDIATE REQUIRED

15 mins



MODERN SLAVERY

Horse Traders

VIDEO

INTERMEDIATE REQUIRED

10 mins



MODERN SLAVERY

Modern Slavery - Sustainability Short

VIDEO

BEGINNER REQUIRED

2 mins



MODERN SLAVERY

Setting Up Your Site to Combat Modern Slavery

DOCUMENT / PRESENTATION

INTERMEDIATE REQUIRED

30 mins



MODERN SLAVERY

The Modern Slavery Act

E-LEARNING MODULE

INTERMEDIATE REQUIRED

15 mins

Supply Chain Sustainability School Resources



MODERN SLAVERY

Modern Slavery

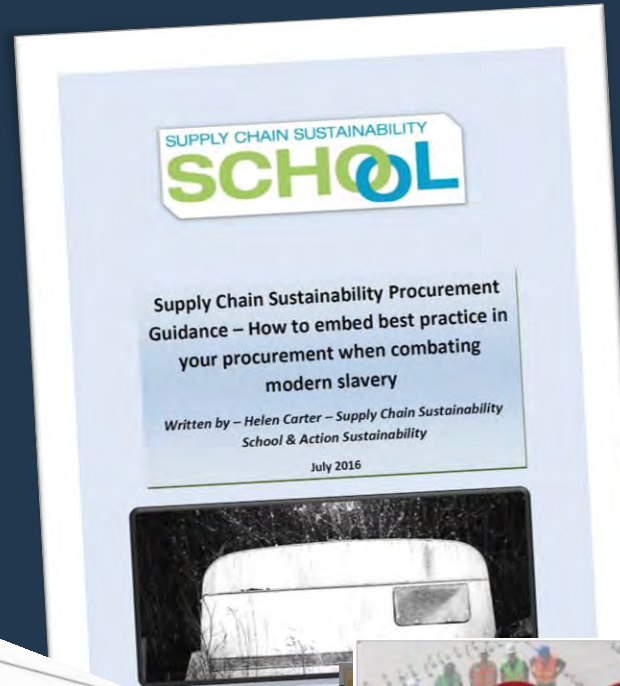
E-LEARNING MODULE

★★★★★ 55 RATINGS

This module will discuss the issue of Modern Slavery and the impacts it can have on your supply chain

BEGINNER 15 mins

[LEARN MORE >](#)




SUPPLY CHAIN SUSTAINABILITY SCHOOL

Supply Chain Sustainability Procurement Guidance – How to embed best practice in your procurement when combating modern slavery

Written by – Helen Carter – Supply Chain Sustainability School & Action Sustainability

July 2016



MODERN SLAVERY

Modern Slavery Due Diligence Prevention Checklist

PRESENTATION



MODERN SLAVERY

SOS Hand Signal

VIDEO

Stronger together have launched the SOS hand signal that can be used by any person on site who needs help, particularly in relation to issues of exploitation.

BEGINNER 2 mins

[LEARN MORE >](#)



HUMAN RIGHTS

Operation Fort: What Businesses Should Learn From The UK's Largest Anti-Slavery Prosecution

DOCUMENT / PRESENTATION

Operation Fort is similar to many other modern slavery cases in encompassing many different types of crime, including modern slavery, human trafficking, fraud, deception, theft and physical abuse. All parties, including law enforcement, non-governmental organisations (NGOs), banks, retailers, suppliers and labour providers can learn from this difficult ...

ADVANCED 45 mins

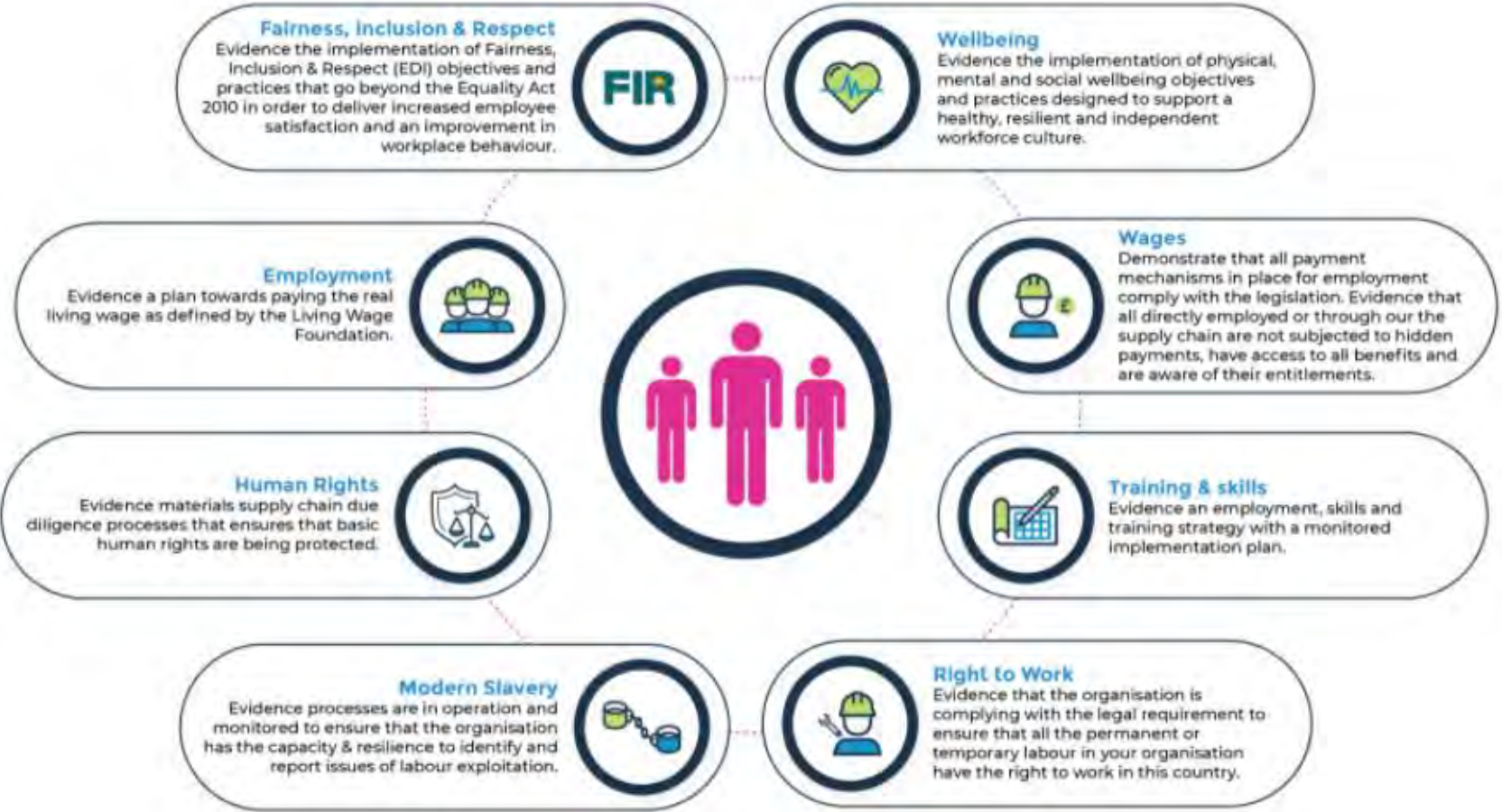
[LEARN MORE >](#)

BS 25700 – Organizational Responses to Modern Slavery

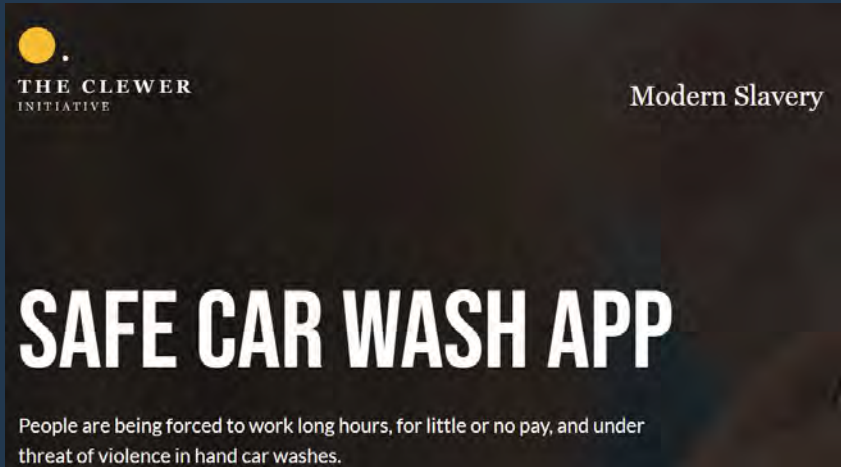


People Matter Charter

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



Start with 3 things.....

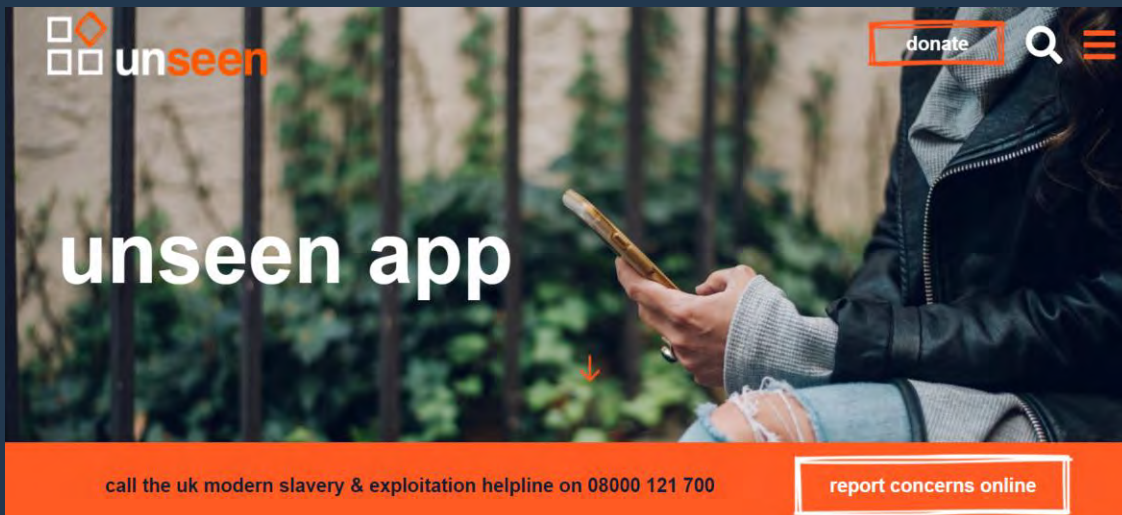


THE CLEWER INITIATIVE

Modern Slavery

SAFE CAR WASH APP

People are being forced to work long hours, for little or no pay, and under threat of violence in hand car washes.



unseen

donate

unseen app

call the uk modern slavery & exploitation helpline on 08000 121 700

report concerns online

Have you calculated your Carbon Footprint?
Do you know your slavery footprint?

www.slaveryfootprint.org



Slavery exists...

Deep within the supply chains of the products we love. Consider this...

- Your Shirt** likely contains cotton that was picked by children in Uzbekistan who are forced to trade their school days for days in the fields.
- Your Phone** has Capacitors that are made with Coltan. 64% of Coltan reserves are located in Congo where child labourers are work from sunrise to sunset.
- Your Coffee** there are estimated 200,000 child slaves working in Ivory Coast alone, harvesting 40% of the world's cocoa beans.



Questions



Modern Slavery, Human Rights, Social Value, Supply Chain Engagement



Emma-jane@actionsustainability.com



EJ Allen

Please share your
feedback



<https://forms.office.com/r/KLEhtF1Xna>

E
Environment

1
Harmful environmental impacts can make people vulnerable to exploitation. Living with a worsening climate crisis can force people to migrate.

Poor anti-slavery agendas can weaken governance, which can result in leaders not knowing what to do when an issue arises and creating a culture where modern slavery can thrive.

S
Social

2
Poor governance can result in strategic decisions being made which do not consider the social impact.

Slavery can affect the environment. It is often part of illegal management practices which disregard environmental protections – often seen in fishing, deforestation and agriculture.

G
Governance

4

3

AN Unchosen FILM

..... Films Against Slavery