

# National Highways

Modern Slavery

08 June 2023





# Tackling Modern Slavery

Modern slavery is a hidden crime that affects every country in the world including the UK and refers to situations of exploitation that a person can't refuse or leave because of threats, violence, coercion, deception, and/or abuse of power and is a violation of fundamental human rights. National Highways will not tolerate this and we are committed to doing business in a responsible and sustainable way which includes a commitment to do all that we reasonably can to prevent all forms of modern slavery in any part of our own business and our supply chain.

We believe that no one should be harmed when travelling or working on our roads. Everything we do focusses on improving the safety of the strategic road network, our customers' experience, and the successful delivery of the Government's investment programme. These underpin all we do and are supported by our company values of Safety, Ownership, Passion, Integrity, and Teamwork. The values describe how we treat each other, how we want to be viewed as an organisation and how we do business.

We are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves and as such the company has an established whistleblowing policy which all staff can access alongside all other company policies on the staff intranet.

We do not enter business with any organisation which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

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



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**EJ Allen**

SUPPLY CHAIN SUSTAINABILITY  
**SCHOOL**

**MORGAN  
SINDALL**



City of Westminster



 **bam**  
nuttall



**Local Government Association**

**South Western Railway**

 **KIER**

**Taylor Wimpey**

**GREATER LONDON AUTHORITY**

**sky**

**nationalgrid**



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA



**Gas Networks Ireland**



**Ministry of Justice**



# How we do it

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If you have **Questions**, please use the chat or raise your hand



Be present in the room! Cameras and mics on please (unless you have extreme background noise)



We will use the platform **Menti** and breakout rooms



**Slides, poll results and workshop output** will be shared

# Introduce yourselves

The background of the slide features two 3D mannequins. On the left is a grey mannequin, and on the right is a red mannequin. They are positioned as if shaking hands, with their right hands meeting in the center. The mannequins are semi-transparent, allowing the background to be seen through them. A white wavy line separates the title from the list below.

actionsustainability 

- ✓ Name
- ✓ Role
- ✓ What's your knowledge of modern slavery on a scale of 1-10?
- ✓ One thing you know about Modern Slavery



[www.menti.com](https://www.menti.com)

**Code: 4646 8852**

EDWARD'S  
STORY



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:**



Forms of Modern Slavery



# THE GLOBAL SLAVERY INDEX 2023



# The Exploitation Spectrum



[Source: CIOB](#)  
[Find the resource here](#)





### Eligibility to Work

35% of companies had not requested or verified appropriate right-to-work documentation. This is an increase of 9% since the publication of our previous report.

**35%**

**16%**

### Wage Deductions

16% of workers had been deducted up to £80 of their weekly wage via a range of administrative deduction methods, a reduction of 01% based on our previous findings.

### Provision of written terms and conditions of employment

36% of individuals interviewed advised that their terms and conditions of employment had either not been provided or had been communicated verbally. Whilst not asked at an individual level the high percentage correlates with our 2021 Ethical Employment Audit finding where 11% of audited companies had not communicated employment terms with indirectly employed labour.

**36%**



## labour exploitation

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106 cases (708 potential victims) of labour exploitation in the care sector



**543**

35% increase of potential victims in construction



**239**

job offer/advertisements were the most common recruitment tactic



**55%**

financial control was the most reported method of control



# Construction Enquirer

More than 30 firms paid for slave labour across London sites

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

CRIMINAL gangs running modern slavery networks are costing the economy £33 billion 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**  
22:06, Mon, Jun 30, 2022 (UPDATED: 09:54, Tue, Feb 1, 2022)



14



News | 18 hours  
**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

On 2 September 2017



**SLAVERY SURVIVOR FEARED CAR WASH GANGS WOULD KILL HIM**  
A Slavonian man tricked into modern slavery and then brutalised 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'

On 6 July 2019



Top: 1) Ignacy Grzesiak, Jan Szabowski, Zdzislaw Chudowski, Justyna Furczanska. Bottom: 2-4) Marek Bostock, Przemyslaw Zmuda, Mateusz Prowdzinski, Marek Chowaniec

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











# Modern Slavery Act 2015

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**It applies to us all**

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**Trafficking and labour exploitation is illegal**

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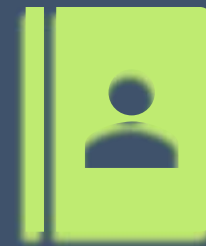
**Companies using exploited labour could now be forced to pay compensation to victims**



# Transparency in supply chain guidelines

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**



can find information and on producing a

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

## 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

**ERADICATING MODERN SLAVERY**

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

**FIND OUT MORE ON GOV.UK**

# Uploading your statement to the modern slavery registry



## Free webinar

- ✓ How to upload your modern slavery statement to the modern slavery registry
- ✓ Practical hints and tips



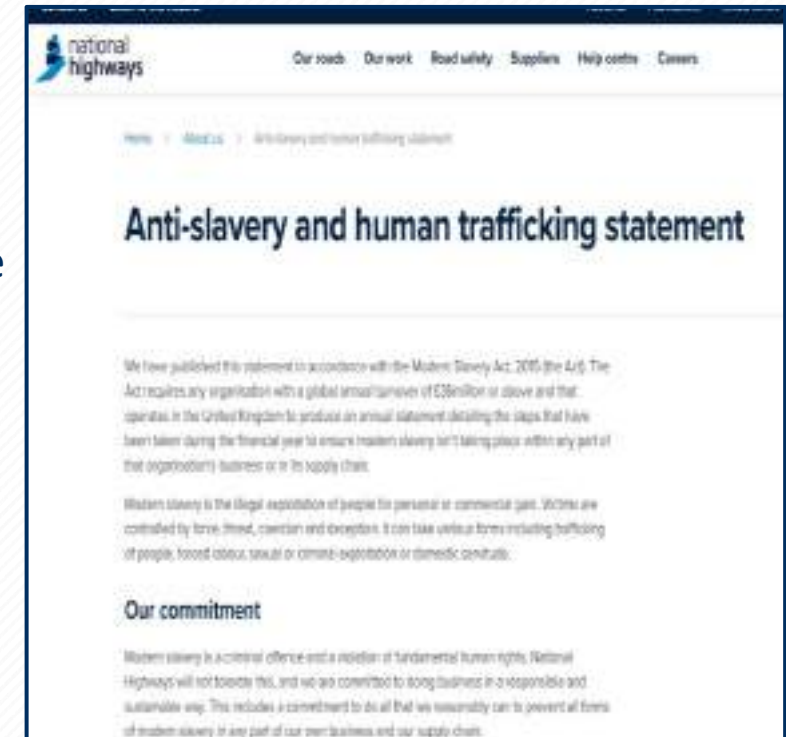
# National Highways Anti-Slavery and Human Trafficking Statement

Our statement articulates our approach and performance in tackling modern slavery.

Each annual statement looks to do more, improving on the previous statement and building on the solid foundations including:

- Developing our learning modules to reflect changing standards. This will ensure our staff have the latest knowledge and tools to identify and manage the risk of modern slavery in our contracts and operations.
- Driving awareness in the supply chain by broadening the availability of our learning and policies through the Supply Chain Sustainability School platform.
- Working with suppliers through supplier relationship management to consider and mitigate modern slavery risks while collaborating to share best practice and identify opportunities to strengthen our approach.
- Continue to work collaboratively with Government, DfT and stakeholders to share best practice and seek to continue to improve our approach to modern slavery.

<https://nationalhighways.co.uk/about-us/anti-slavery-and-human-trafficking-statement/>







**NEW RULES FOR CORPORATE REPORTING - LARGE COMPANIES WILL HAVE TO PUBLICLY DISCLOSE IMPACT ON ENVIRONMENT AND HUMAN RIGHTS**

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



German parliament passes mandatory human rights due diligence law



**Modern Slavery Act 2018**

Guidance

**PPN 02/23: Tackling Modern Slavery in Government Supply Chains**

**Uyghur Forced Labour Prevention Act (UFLPA)**



**France's Duty of Vigilance Law**



The background of the slide features a dark, blue-toned photograph of construction workers silhouetted against a twilight sky. The workers are positioned across the middle ground, some standing and others in motion, with various pieces of construction equipment visible. A vertical yellow bar with a fine grid pattern runs along the left edge of the image. The text 'Due Diligence' is centered in the upper half of the image, underlined with a bright yellow line.

# Due Diligence

# What is due diligence?

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Ongoing risk management process to **identify, prevent, mitigate and account for how adverse impacts are addressed** in the organization and business associates (BS 25700:2022 Organizational responses to modern slavery – Guidance)

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**FIND and FIX** – Chris Harrop - *Marshalls*

**NOT CONFIRMATION OF ZERO SLAVES**



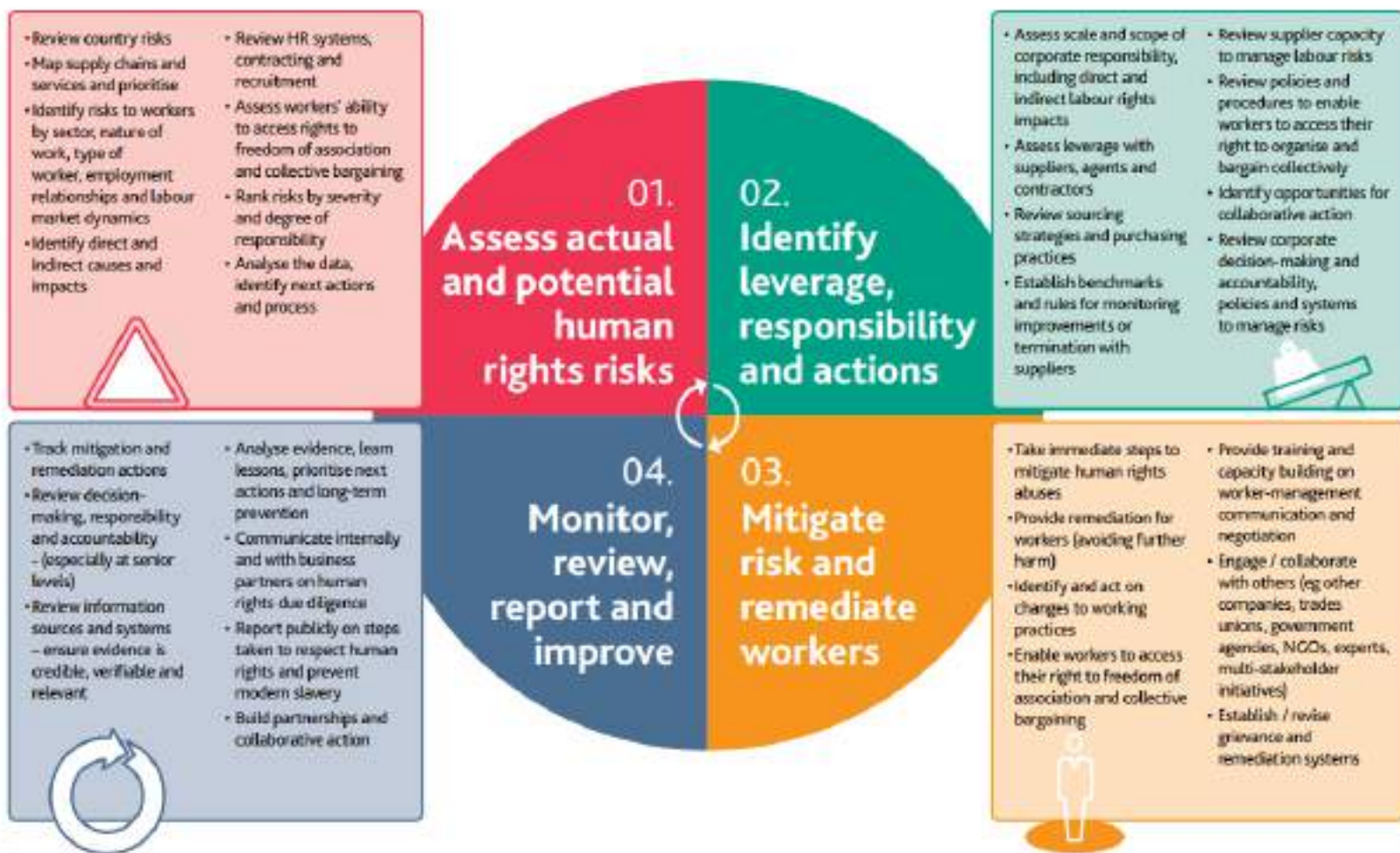
"We searched our suppliers and we found slavery," Forrest said.





## ETI HUMAN RIGHTS DUE DILIGENCE FRAMEWORK

*Key steps that companies should take to prevent, manage and mitigate human rights abuses in their own operations and supply chains.*









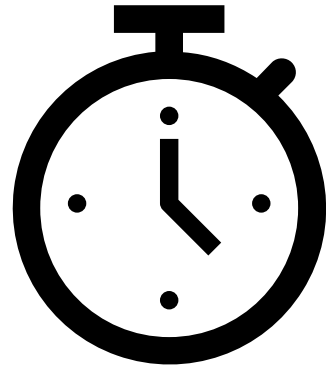




Organisational  
Due Diligence

Supply  
Chain Due  
Diligence

Site Due  
Diligence



WHAT EXAMPLES OF DUE DILIGENCE IN COMBATING MODERN SLAVERY AND LABOUR EXPLOITATION CAN YOU THINK OF? WHAT ARE YOU DOING? WHAT DO YOU SEE FROM YOUR CLIENTS?



# Tackling Modern Slavery

- National Highways Policy
  - The policy supports our commitment to preventing illegal and unethical labour practices occurring in any part of our business or our supply chain.
- Training
  - Our online Modern Slavery training courses are for everyone working in Commercial and Procurement. It covers types of Modern Slavery, vulnerabilities and control methods used by traffickers as well as providing guidance of signs to look for in identifying incidences. The courses also inform how to report Modern Slavery in and around the workplace. Alongside this, it touches upon legal requirements including the Modern Slavery Act 2015.
- Internal and External Communications
  - Regular communications are cascaded business wide tailored to the different business needs. H&S moments have been produced which are available for sharing at external events.

It's easy to think it won't happen to us...

Modern slavery is happening now. We all have a responsibility to ensure that everyone that works for us is **safe and have good working conditions**. As well as posing severe health and safety risks for the victims, it can lead to legal, financial and reputational challenges to organisations.

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 create a culture of distrust and a lack of accountability.
- Variability in labour demand and associated job insecurity.

Think about the touchpoints within your extended supply chain  
How do you think the current economic climate and social issues impact the risks of Modern Slavery infiltration in your business and supply chain?

How to report suspicions:  
If you suspect modern slavery is happening, you can contact the Modern Slavery Helpline on 08000 121 700 or online at: [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)

Be aware – Don't walk past it



# Tackling Modern Slavery

## Additional tools:

- Supply Chain Sustainability School
  - In February 2020, National Highways upgraded to a partnership membership of the Supply Chain Sustainability School to further empower our people and collaborate with our supply chain.
  - We used our partner contribution to the school to set up two Learning Pathways for the Highways Sector which provides support and core knowledge across all programs. Those subjects include Modern 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 programs of work.
- Legal routes
  - We build relationships with all our suppliers to ensure they comply with our values and that they are aware of our commitment to protect human rights. As part of our procurement processes, we require all our suppliers to comply with the requirements of the Modern Slavery Act and include appropriate contractual obligations within all our commercial agreements.
- Cabinet Office Controls
  - Continuing with the theme of legal obligations we work closely with Cabinet Office where MS forms part of the approval process.

# Enablers

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Leadership & commitment

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Risk assessment & setting priorities

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Recruitment & employee relations

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Training & awareness

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Stakeholder engagement

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Supply chain procurement

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Grievance & remediation

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KPIs – measurement & reporting









# WHAT'S THE DIFFERENCE?



# IDENTIFYING RISK

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Use of temporary / transient labour

Low skilled or low pay

Migrant workers

Contract & agency workers

Industry / category / country risk



**Consider risk in your own business, your operations, your supply chain and your business relationships**

# SETTING PRIORITIES

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what's the  
opposite of  
prioritise?



cancel, disorder, disorganize,  
disperse, forget, let go,  
scatter, neglect



**Your priorities will be determined by understanding where the risk lies, the impact of the risk, and your capacity to influence change (either as an organisation or through collaboration)**



# Recruitment / employment considerations

# 17%

## Wage deductions

17% of workers had been deducted up to 25% of their weekly wage via a range of non-standard deductions.

Source: Achilles Ethical Employment Trends Report

## Workers' Checklist

Your rights as a worker in the UK

	<b>Your job</b> You should have a clear contract that explains what you will be doing, what you will be paid and your working hours and terms of employment.	
	<b>What, where and how long for</b> You should know where you are working, what you will be doing and how long you will be there. You should not have to stay overnight without being paid for it. You must not be asked to sleep on the spot.	
	<b>Money</b> You should be paid at least the legal minimum wage. You should not have any deductions from your pay, unless you have agreed to them in writing. You must get a payslip showing how you are paid.	
	<b>No threats or abuse</b> Nobody should threaten or pressure you to do anything physically demanding. Nobody has to make you work. Nobody is allowed to hear your account.	
	<b>Accommodation</b> If provided, your accommodation must be safe and secure. You should not pay for it and you should be able to leave.	
	<b>Water and rest</b> You should have access to clean water, toilets and somewhere to rest. You should have breaks when you are working.	
	<b>Safety at work</b> Your work must be safe. You should be provided with safety equipment and training. You should have a clear procedure for reporting any safety issues.	
	<b>Transport</b> Discretion should be given to provide, or help with, costs and facilities, and for those using public transport.	



Source: GLAA



**11%**

**Ensuring terms and conditions of employment**

11% of companies were unable to demonstrate written terms and conditions had been issued to workers.

Source: Achilles Ethical Employment Trends Report

- ✓ Position, accurate job description, duration of contract, and place of work
- ✓ Entitlements
- ✓ Discrimination and bullying policies and information
- ✓ Freedom of association
- ✓ Minimum wage, payment and benefits
- ✓ Working time, overtime, and other working conditions
- ✓ Living conditions (if relevant)
- ✓ Grievance and access to remedy



**Ensure understanding around zero hours contracts [ACAS info](#)**

# LESSONS IDENTIFIED BY OPERATION FORT

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## Recruitment agencies

- Placed too much trust in individual employees
- Did not identify victims during interviews or inductions
- Carried out ineffective checks to detect anomalies, such as shared bank accounts and addresses
- Could have been more productive in checking worker welfare

## UK slavery network 'had 400 victims'




@ 5 July 2019



[Download report](#)



# COMPETENCY BUILDING - EXAMPLES

 Knowledge requirement	 Examples of target audience	 How?
What is modern slavery? How to spot it? What to do if you suspect it? Organisational policy & objectives	All employees & suppliers	<ul style="list-style-type: none"> <li>✓ Inductions</li> <li>✓ Posters</li> <li>✓ E-learning</li> <li>✓ Toolbox talks</li> <li>✓ Videos</li> <li>✓ Social media, newsletters, intranet</li> <li>✓ Meetings</li> </ul>
Processes, methods and tools to manage the risk of modern slavery	Senior management, contract managers, procurement, commercial, recruitment, operational staff, bid teams	<ul style="list-style-type: none"> <li>✓ Workshops</li> <li>✓ E-learning</li> <li>✓ Peer groups</li> </ul>
Ethical procurement, responsible sourcing, sustainable procurement, supply chain mapping	Procurement, commercial, bid managers, heads of department	<ul style="list-style-type: none"> <li>✓ Workshops</li> <li>✓ E-learning</li> </ul>
Reporting and due diligence for modern slavery and human rights	Compliance officers, Heads of CSR / Sustainability	<ul style="list-style-type: none"> <li>✓ E-learning</li> <li>✓ Knowledge sharing forums</li> <li>✓ External conferences</li> </ul>
Development of remediation process	Senior management	<ul style="list-style-type: none"> <li>✓ Knowledge sharing forums</li> <li>✓ Stakeholder engagement</li> </ul>
Worker empowerment – ensuring workers are aware of their employment rights	Workers, operational staff & recruitment	<ul style="list-style-type: none"> <li>✓ Videos</li> <li>✓ Mobile apps</li> <li>✓ Inductions</li> </ul>

 **Where you have categories of spend considered ‘high risk’ of modern slavery, consider how you can embed similar training requirements through the procurement process**

# 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

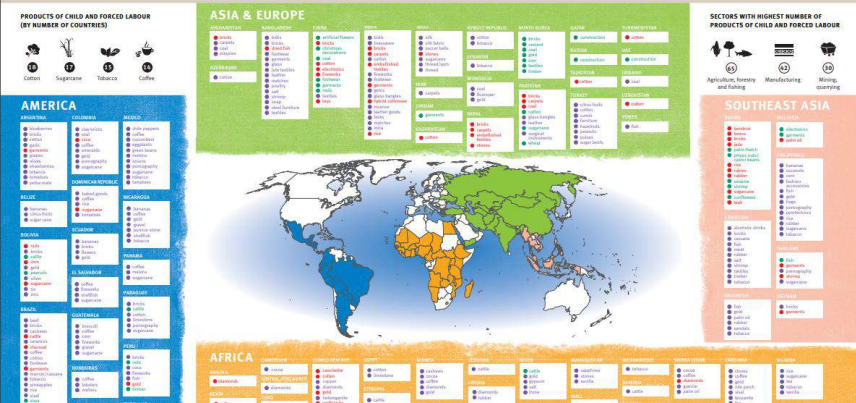
This self-enrol learning path contains resources designed to build on your basic knowledge of modern slavery and delve deeper in due diligence within organisations and supply chains. To achieve the badge for this learning path, you must complete each resource.

[VIEW PATHWAY >](#)

# RESOURCES

## Products of Slavery and Child Labour

There are an estimated **168 million children** in child labour and **21 million people** in forced labour across the world today.



## Learning pathways

- 
**Modern Slavery: An Introduction**

The self-paced learning pathway is designed to help you gain understanding of modern slavery risks within your supply chain. At the end of the course you will be able to identify the products of modern slavery and how you can reduce the risk of modern slavery within your organisation. To access the full course, you must complete your registration.

[View course >](#)
- 
**Modern Slavery: Site Set-Up**

This self-paced learning pathway is designed to help you gain understanding of modern slavery risks, to help your organisation to better understand the risks of modern slavery in your supply chain and to help you to manage the risks. To access the full course, you must complete your registration.

[View course >](#)
- 
**Modern Slavery: Due Diligence**

This self-paced learning pathway is designed to help you gain understanding of modern slavery risks, to help your organisation to better understand the risks of modern slavery in your supply chain and to help you to manage the risks. To access the full course, you must complete your registration.

[View course >](#)




**SUPPLY CHAIN SUSTAINABILITY SCHOL**

**Supply Chain Sustainability School - 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

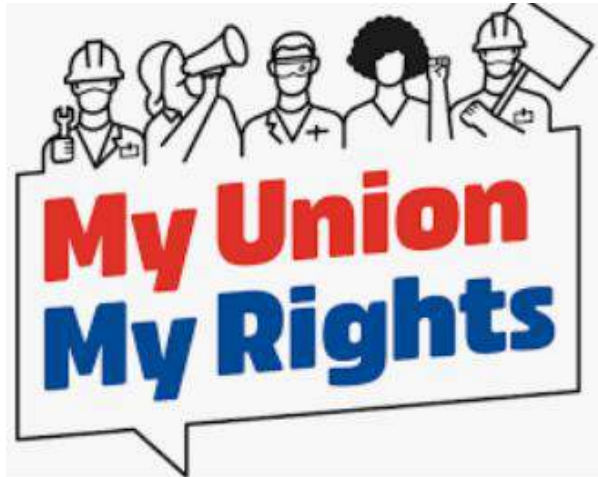





# RESOURCES - WORKER EMPOWERMENT



Workers' Rights leaflets are available in 21 languages, listed below.



## GLAA launches national workers' rights qualification

28th January 2021

A new qualification providing students with the skills and knowledge to abuse will launch next week.



## Grievance & Remediation



**Collaborate, collaborate, collaborate...**

# SUPPLY MANAGEMENT



## How buying practices could be increasing supply chain slavery risk

posted by *Juliette Rowsell*  
in *Ethics, Procurement, Risk*

🕒 14 February 2023

*“Even if a supplier is suspected of being complicit in the crime, the priority should be to work closely with the supplier to help the victims, and ensure it does not happen again. Reactive contract termination can lead to fear and concealment by suppliers, which in turn puts victims at greater risk.”*



# REMEDICATION

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- Collaboration is key
- Don't just boycott – engage suppliers
- Take responsibility – put victims first
- Prevention is the best form of remedy
- Engage everyone
- Survivor voice

21/30431029 DC



BSI Standards Publication

BS 25700. Organizational responses  
to modern slavery. Guidance

**PAGES 35-40**

**bsi.**

...making excellence a habit™

# Modern Slavery

## Marshalls Slavery and Anti-Human Trafficking Policy and Disclosure Statement

# 2020



# 2020/21 KPIs



Develop strategic collaborations/partnerships/initiatives to identify, prevent and mitigate human rights abuses in Marshalls' own business operations and supply chains, to build capacity/engagement/collaboration in the wider construction sector, and seek to make a societal net positive impact.

- Engage with governments and government agencies both in the UK and overseas to share knowledge, agree root causes, overcome challenges and raise awareness of international supply chain transparency standards, and engage in long term capacity building partnerships.
- Continue to actively engage in the Bright Future programme – now as a founding member of the Bright Future Co-operative – offering placement and recruitment opportunities to survivors of modern slavery.
- Continue with the multi-stakeholder programme in Vietnam, lead by the IDM.
- Maintain our active engagement with ILO Child Labour Platforms.
- Actively seek the expansion of Marshalls Power of Logistics Programme by engaging other businesses with significant logistics operations.



Implement appropriate remediation and support programmes for victims of modern slavery identified within the organisation's operations and supply chains.

- Have in place a solid and appropriate process of remediation and support for 72% of the supply chain identified as high risk by volume of product from India and Vietnam.
- Continue to develop and implement a forced labour/modern slavery identification and remediation processes in Marshalls UK business operations, and in supply chains in India, Vietnam & Europe.



Overhaul and further improve the organisation's supply chain due diligence.

- Continue to publish annually modern slavery country risk mapping profiles for 100% of sourcing countries.
- Enhance internal processes and procedures, for 68% of all supply chains (by volume) identified as high risk, which

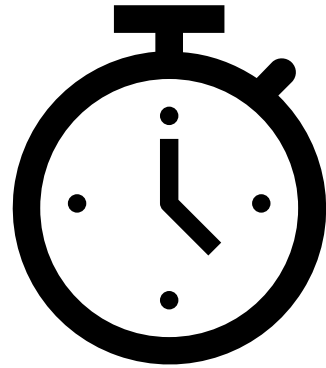


Organisational  
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Supply  
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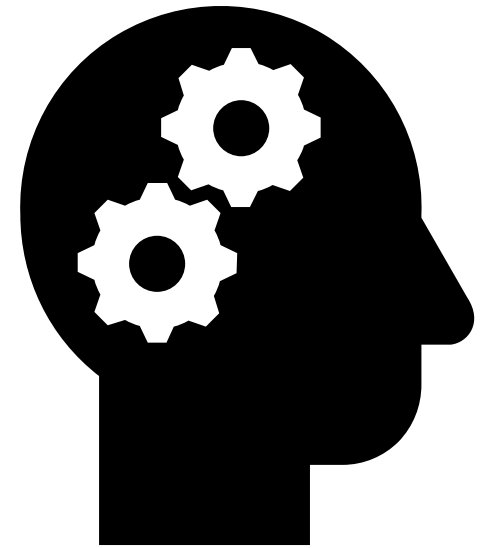
Site Due  
Diligence





WHAT SIGNS MIGHT A VICTIM  
DISPLAY?  
HOW DO EXPLOITERS CONTROL  
THEIR VICTIMS – WHAT  
METHODS DO THEY USE?

[WORKSHOP](#)





[www.menti.com](https://www.menti.com)

**Code: 4646 8852**



# 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







**Toolbox talk: Spot the signs, with trainer script / prompts**

# Tools for site teams

## Awareness

Resources	Activities	Useful Links
<p><b>Toolbox talks: Modern Slavery</b></p> <p>Modern slavery is a criminal offence under the Modern Slavery Act 2015. It includes slavery, human trafficking and forced labour. It is a global issue that affects millions of people every year.</p>  <p><b>Are you alright?</b></p> <p>Everyone has rights</p> <p>You can: - Ask your employer - Report any concerns - Stop your work - Get help</p> <p>You should not: - Work excessively long hours - Feel threatened - Be forced to get a job</p> <p>If you are a migrant worker, please refer to more information about rights to the link.</p> <p><b>Recognising modern slavery</b></p> <p>Modern slavery is a criminal offence under the Modern Slavery Act 2015. It includes slavery, human trafficking and forced labour. It is a global issue that affects millions of people every year.</p> 	<ul style="list-style-type: none"> <li>✓ Include modern slavery and exploitation in site induction</li> <li>✓ Use site checklist as part of the induction on a cross section of site staff (include subcontractors - appendix 1 provides an example)</li> <li>✓ Posters to be displayed on site</li> <li>✓ Include Modern Slavery and Labour Exploitation in toolbox talks</li> <li>✓ Ensure your staff understand the signs to look for</li> <li>✓ Ensure your staff understand what they do in case they suspect a colleague is a victim of labour abuse</li> <li>✓ Ensure you have a nominated staff member who is trained on how to interview employees and support victims if they are found.</li> </ul>	<p>GLAA Induction Guidance - <a href="https://www.gla.gov.uk/media/4667/construction-protocol-induction-information.pdf">https://www.gla.gov.uk/media/4667/construction-protocol-induction-information.pdf</a></p> <p>GLAA Induction Slides - <a href="https://www.gla.gov.uk/media/4668/modern-slavery-induction-pack-with-translations.pptx">https://www.gla.gov.uk/media/4668/modern-slavery-induction-pack-with-translations.pptx</a></p> <p>Videos:</p> <p>Supply Chain Sustainability School <a href="https://www.youtube.com/watch?v=Dzt1ntzdMAc">https://www.youtube.com/watch?v=Dzt1ntzdMAc</a></p> <p>Stronger Together <a href="https://www.stronger2gether.org/product/concrete-tackling-modern-slavery-in-the-construction-sector/">https://www.stronger2gether.org/product/concrete-tackling-modern-slavery-in-the-construction-sector/</a></p> <p>Site Posters:</p> <p>GLAA: <a href="https://www.gla.gov.uk/media/4652/are-you-alright-poster-site-v3.docx">https://www.gla.gov.uk/media/4652/are-you-alright-poster-site-v3.docx</a> <a href="https://www.gla.gov.uk/media/4651/are-you-alright-poster-safe-v3.docx">https://www.gla.gov.uk/media/4651/are-you-alright-poster-safe-v3.docx</a> <a href="https://www.gla.gov.uk/media/4650/are-you-alright-poster-rights-v3.docx">https://www.gla.gov.uk/media/4650/are-you-alright-poster-rights-v3.docx</a></p> <p>Stronger Together: <a href="https://www.stronger2gether.org/product/construction-worker-poster-en-po-li-ru/">https://www.stronger2gether.org/product/construction-worker-poster-en-po-li-ru/</a></p>

# Tools for site teams

## Identification

### Resources



### Activities

- Understand the links between exploitation and right to work (makes sure your checks for legal documents are also considering exploitation)
- Understand the links between exploitation and mental health conditions such as PTSD, Depression etc.
- If you have a site mental health first aider, are they trained in spotting the signs
- Take an interest in your site - how are people behaving?
- Bring checks into your site inspections and audit

### Useful Links

Government - Home Office Right to Work Checklist:

[Right to work checklist](#)





# Tools for site teams

## Respond

### Resources



### Activities

- Ensure the hierarchy of reporting is clear and you understand the project policy.
- Immediate danger 999, suspicions can be reported to GLAA and/or Modern Slavery Helpline
- Report your suspicions to your line manager
- Ensure that instances are reported back up to your head office via the required reporting route to capture cases and intelligence
- Use the guidance sheet - appendix 2 as a checklist when approaching victims
- As a project consider how you can support local charities and safe houses that support victims of exploitation in your local areas.

### Useful Links

#### Helplines:

- [Modern Slavery Helpline](#)
- [Salvation Army](#)
- [Gangmasters Labour Abuse Authority](#)

Insert your organisation's helpline and reporting procedures here:

xxx

[Download guidance on How to Set up your Sites to Combat Modern Slavery](#)

# LEARNING 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.

### 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

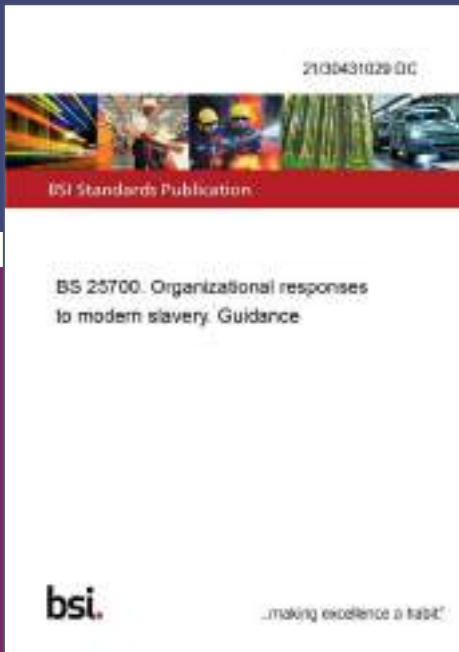
The Modern Slavery Act

E-LEARNING MODULE

INTERMEDIATE REQUIRED

15 mins

# bsi.



bsi. Standards Services Sectors Topics About

Home / Standards / BS 25700:2022 Organizational responses to modern slavery - Guidance

## New British Standard on Modern Slavery

### BS 25700: Organizational responses to modern slavery - Guidance

BSI has published a pioneering national standard, giving organizations guidance on how to manage modern slavery risks in their operations, supply chains and wider operating environment.

**100% FREE**

[BS 25700:2022 Organizational responses to modern slavery - Guidance | BSI \(bsigroup.com\)](https://www.bsigroup.com/en-GB/standards/bs-25700/)

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SECTION FIVE

# Procurement due diligence



HIGHLIGHTS  
2023

# THE PRODUCTS WE BUY...

# ...CONNECT US TO MODERN SLAVERY



Value of at-risk goods imported by G20 countries

Legend

Annual value of at-risk products imported in US\$

At-risk products

Top 5 at-risk products imported

Products

- Cattle
- Coal
- Cocoa
- Coffee
- Electronics
- Fish
- Garments
- Gold
- Palm Oil
- Rice
- Solar Panels
- Sugar Cane
- Textiles
- Timber

**Governments and businesses must do more to tackle slavery in supply chains.**

At risk goods imported by the G20

**US\$468 BILLION**

Electronics   
**US\$243.6 BILLION**

Garments   
**US\$147.9 BILLION**

Palm Oil   
**US\$19.7 BILLION**

Solar Panels   
**US\$14.8 BILLION**

Textiles   
**US\$12.7 BILLION**

[GO TO CONTENTS](#)

AN Unchosen FILM

..... Films Against Slavery



# Risk Assessments are generated through workshop activity

## RISK ASSESSMENT WORKSHOP INPUTS & STAKEHOLDERS



### SPEND CATEGORY

Category of spend at business unit or project level

### MODERN SLAVERY IMPACT CRITERIA

- Geographical Risk
- Industry Risk
- Prevalence of low skilled labour
- Poor Labour Laws
- Use of Temporary/Transient Labour

### EVALUATION CRITERIA

- Relative magnitude of impact/risk
- Scope for Improvement
- Leverage to improve
- Nature of the business relationship

### KEY STAKEHOLDERS

- Supply Chain/ Procurement
- SHEQ
- Production
- Sales
- HR

Spend category	Geographical Risk	Industry Risk	Prevalence of low skilled labour	Poor Labour Laws	Use of Temporary/Transient Labour	Relative magnitude of impact/risk	Scope for Improvement	Leverage to improve	Nature of the business relationship	Supply Chain/ Procurement	SHEQ	Production	Sales	HR
Site Preparation	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Demolition & Clearance	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Land Reclamation	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Site Investigation	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Groundworks	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Building & Civils	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Concrete works	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Steelwork	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Road & Bridge works	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Stone & Brickworks	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Tunnelling	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
M&E Services	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
Building Finishing	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red



what's the  
opposite of  
prioritise?



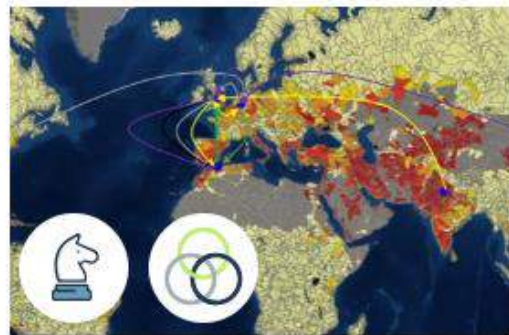
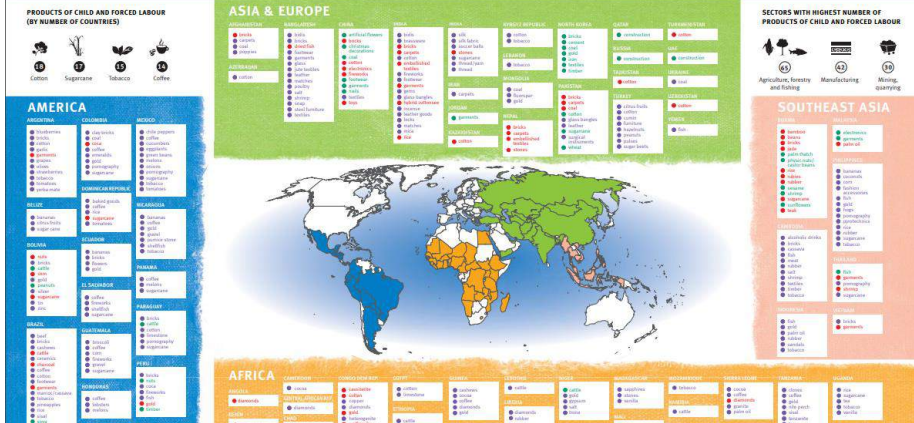
cancel, disorder, disorganize,  
disperse, forget, let go,  
scatter, neglect



# RESOURCES FOR PROCUREMENT

## Products of Slavery and Child Labour

There are an estimated **168 million children** in child labour and **21 million people** in forced labour across the world today.



## Supply Chain Mapping Results

Examples of supply chain maps for four products overlaid ...



## Supply Chain Mapping Protocol

What supply chain mapping (SCM) is, what the benefits are ...



**Supply Chain Sustainability School - 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





# Products of Slavery and Child Labour

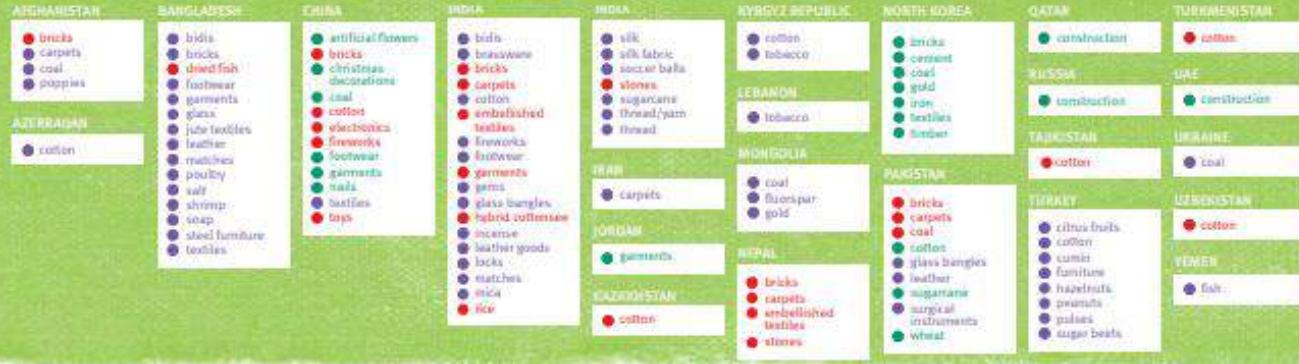
There are an estimated **168 million children** in child labour and **21 million people** in forced labour across the world today.



## PRODUCTS OF CHILD AND FORCED LABOUR (BY NUMBER OF COUNTRIES)



## ASIA & EUROPE



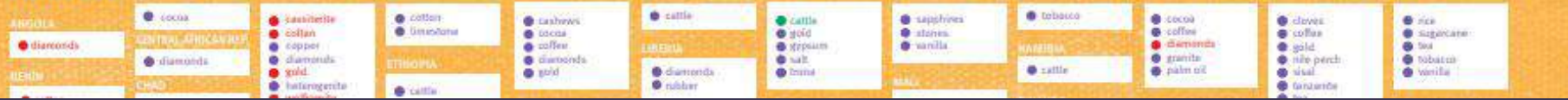
## SECTORS WITH HIGHEST NUMBER OF PRODUCTS OF CHILD AND FORCED LABOUR



## AMERICA



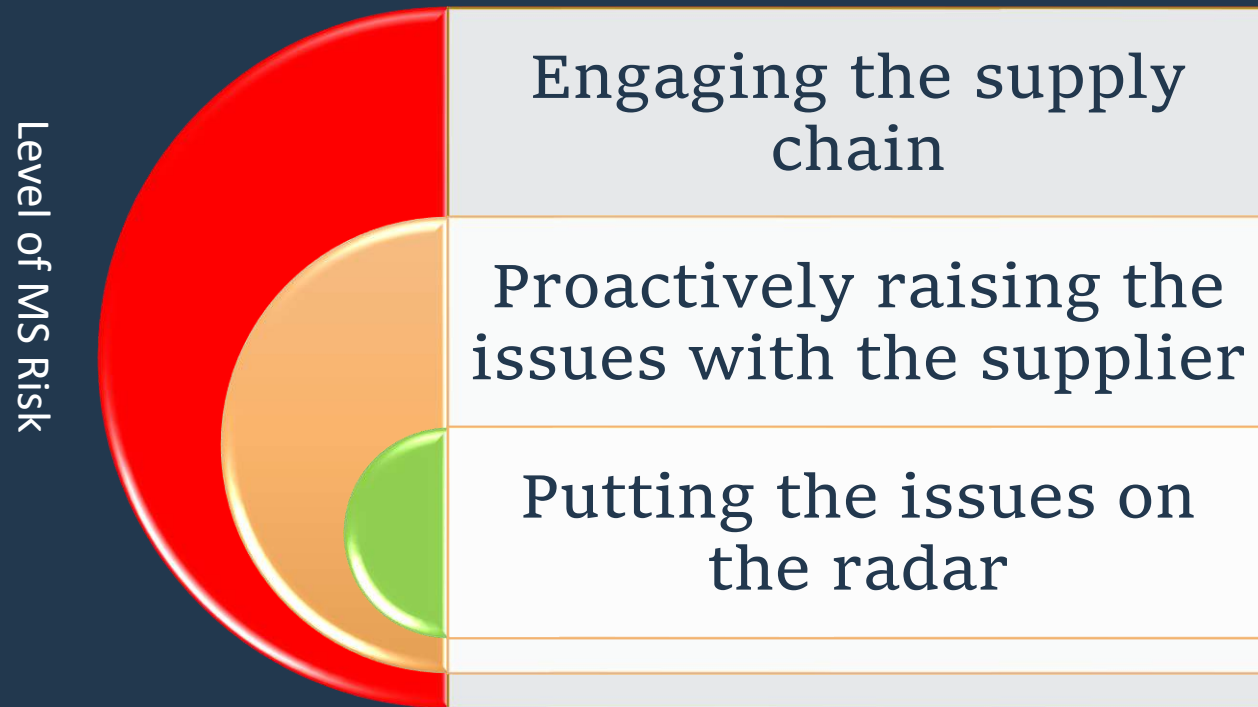
## AFRICA



## SOUTHEAST ASIA



# Supply chain strategies



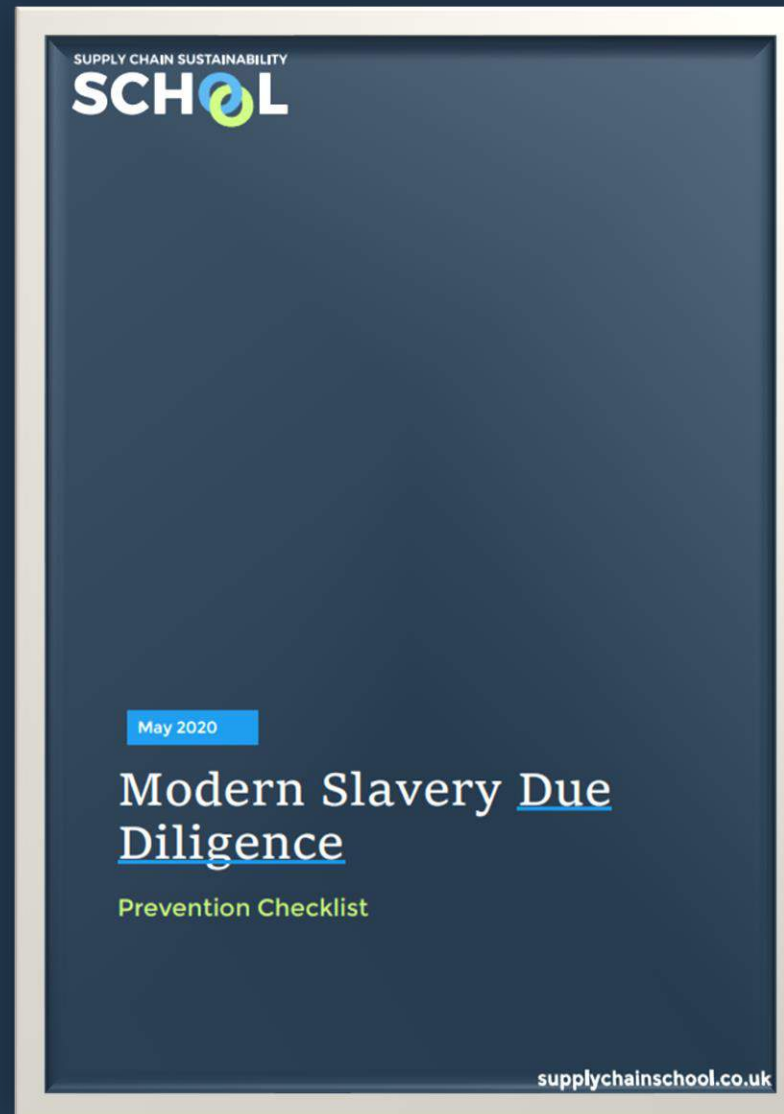
- ✓ Supply chain mapping/Social Audits
- ✓ Supplier Development
- ✓ Strategic Supplier Relationships
- ✓ Training Programs & On Site Compliance

- ✓ Pre-qualifications
- ✓ Clarifications & negotiations
- ✓ Normal supplier meetings

- ✓ Contractual terms
- ✓ Comms and standard website awareness

# Due diligence checklist

[Download checklist here](#)





# Supply Chain Sustainability School resources



MODERN SLAVERY

## Modern Slavery

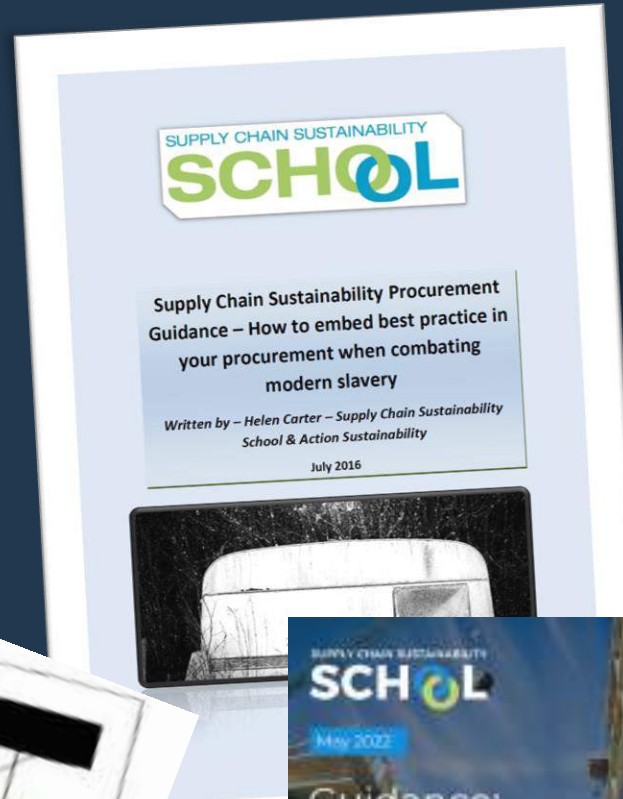
E-LEARNING MODULE

★★★★★ [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 >](#)

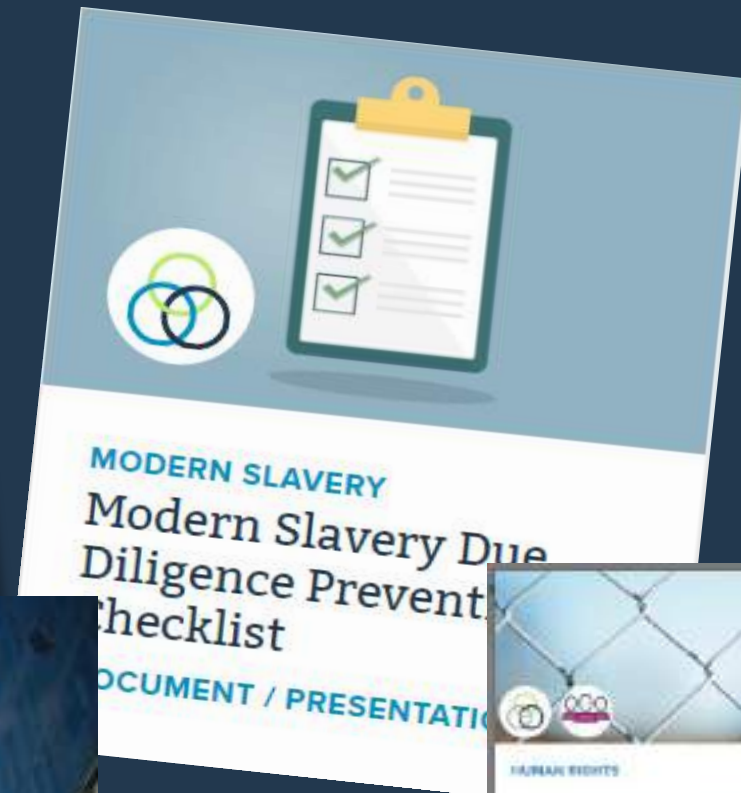



SUPPLY CHAIN SUSTAINABILITY  
**SCHOOL**

### 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

DOCUMENT / PRESENTATION



SUPPLY CHAIN SUSTAINABILITY  
**SCHOOL**

May 2022

## Guidance: Right to Work

Emma-Jane Allen



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 >](#)

4 simple things.....

SUPPLY CHAIN SUSTAINABILITY

**SCHOOL**

Construction against  
slavery group

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.

Have you calculated your Carbon Footprint?  
Do you know your slavery footprint?  
[www.slaveryfootprint.org](http://www.slaveryfootprint.org)

unseen

# unseen app

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

report concerns online

Slavery exists...

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

- Building
- Mobile phone
- Coffee cup



# QUESTIONS



Please share your  
feedback



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



Emma-jane@actionsustainability.com

action sustainability 

[www.actionsustainability.com](http://www.actionsustainability.com)

SUPPLY CHAIN SUSTAINABILITY

**SCHOL** 

[www.supplychainschool.co.uk](http://www.supplychainschool.co.uk)



[www.sustainabilitytool.com](http://www.sustainabilitytool.com)



Emma-Jane  
Allen (EJ)