



Home Office

# Tackling Modern Slavery in Supply Chains

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# What makes a good transparency statement?

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- Legally compliant and...
- demonstrates high quality action, not just words
- Covers the following six areas:
  1. Organisational structure and supply chains
  2. Organisational policies
  3. Assessing and managing risk
  4. Due Diligence
  5. Performance Indicators
  6. Training
- Uses simple and easily to understand language.
- Hyper-links to relevant policies and publications; previous statements available; searchable i.e. not a scanned PDF

# Good practice example

<b>MODERN SLAVERY RISK</b>	<b>WHAT'S THE ISSUE?</b>	<b>STEPS TAKEN 2015-16</b>	<b>COMMITMENTS 2016-17</b>
<p><b>MIGRANT LABOUR</b></p>	<ul style="list-style-type: none"> <li>• Migrant workers paying recruitment fees may be trapped in bonded labour and be subjected to inferior employment terms</li> <li>• Labour recruiters create an additional layer between employers and workers, leaving workers exposed to deceptive or coercive recruitment practices</li> <li>• Migrant workers often do not understand their rights in the destination country and the terms of their employment</li> <li>• Countries of highest risk: Mauritius, China</li> </ul>	<ul style="list-style-type: none"> <li>• Developed Migrant and Contract Labour Policy</li> <li>• Conducted in-depth migrant worker assessments in Mauritian factories</li> <li>• Delivered two-supplier meetings in Mauritius on migrant labour recruitment</li> <li>• Initiated ETI Mauritius Migrant Labour working group</li> <li>• Met with Mauritian Government Minister for Labour in May 2016 to raise concerns about risks faced by migrant workers in Mauritian factories and explain the requirements of UK Modern Slavery legislation</li> <li>• Met with British High Commissioner in Mauritius in July 2016 to discuss migrant labour issues within context of Modern Slavery Act</li> </ul>	<ul style="list-style-type: none"> <li>• Map and carry out risk assessment of migrant labour across ASOS brand supply chain</li> <li>• Identify and engage with key NGO and Trade Union stakeholders on our migrant labour programme in Mauritius</li> <li>• Implement Mauritius factory improvement plans</li> <li>• Develop an action plan and pre-departure training to address the root cause of worker exploitation through the migrant worker recruitment process</li> </ul>

# What makes a bad transparency statement?

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- Vague: doesn't specify what the company is doing in any real detail
- Reactive not proactive: only concerned with responding when cases are found
- Doesn't specify priority areas of risk and future plans
- Drafted by risk averse legal teams rather than experts

# Bad practice example

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UK Modern Slavery Act Statement

## ██████████ Slavery and Human Trafficking Statement 2017

██████████ is a global technology company committed to conducting ethical and environmentally responsible business. ██████████ is headquartered in the UK and manufactures in Singapore, Malaysia and the Philippines.

██████████ and its suppliers work to an ethical and environmental code of conduct which sets out ██████████'s requirements in relation to labour practices, health and safety, responsible sourcing and environmental standards. ██████████ is clear that forced labour in any form is unacceptable.

██████████ has a dedicated Corporate Social Responsibility (CSR) team that works with suppliers through a combination of assessments using ethical database Sedex, supplier training and audits. ██████████ uses information from Sedex risk assessments to help prioritise suppliers for audit. In addition to audits, ██████████ operates a third party hotline for workers to make contact and raise any issues relating to working conditions.

Audits are conducted by ██████████ auditors or by independent CSR auditors. In order to fully understand the working environment in a supplier facility, the auditors interview a cross-section of the workforce without management present.

Signed by:

# New developments

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- Increased focus on quality and compliance
- Using power of public procurement
- Moving towards international standards

# Government guidance and resources

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Just search for:

- “TISC Practical Guidance” for detailed Government guidance on complying with TISC.
- “Modern slavery resources for industry” for factsheets and posters for your industry.
- “Stopping modern slavery in business” to find social media graphics like this:



We have published our  
**SLAVERY AND  
HUMAN TRAFFICKING  
STATEMENT**

HELP FREE THE UK FROM  
**MODERN  
SLAVERY**



Find out how we are tackling this  
crime on our website

# NGO guidance and resources

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## Guidance

- CORE Coalition, Recommended Content for a Modern Slavery Statement (*Short guidance*)
- CORE Coalition, Beyond Compliance: Effective Reporting under the Modern Slavery Act (*Detailed guidance*)

## Resources

- Ethical Trade Initiative
- Stronger Together
- Business & Human Rights Resource Centre
- TISC Report & Modern Slavery Registry