

Understanding and reporting on Modern Slavery – an interactive workshop

10 March 2016

London

Ergon Associates
Seafish



Modern Slavery Act
2015



Your expectations

- What do you know so far?
- Where are you with regard to your MSA statement?
- Key issues you need to understand
- Challenges and barriers
- Outcomes and objectives that you want from today

Objectives

Build awareness of modern slavery risks

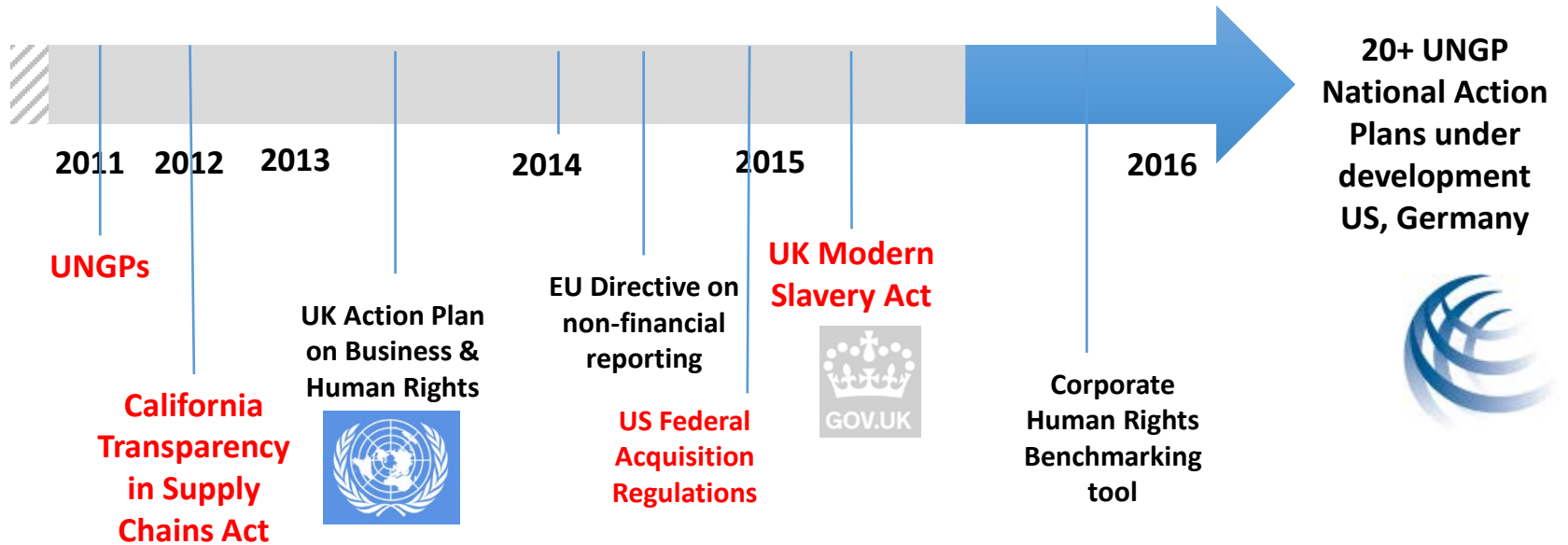
Understanding the Modern Slavery Act (MSA)

What you need for your MSA statement and supporting due diligence

Identifying next steps, timelines and responsibilities

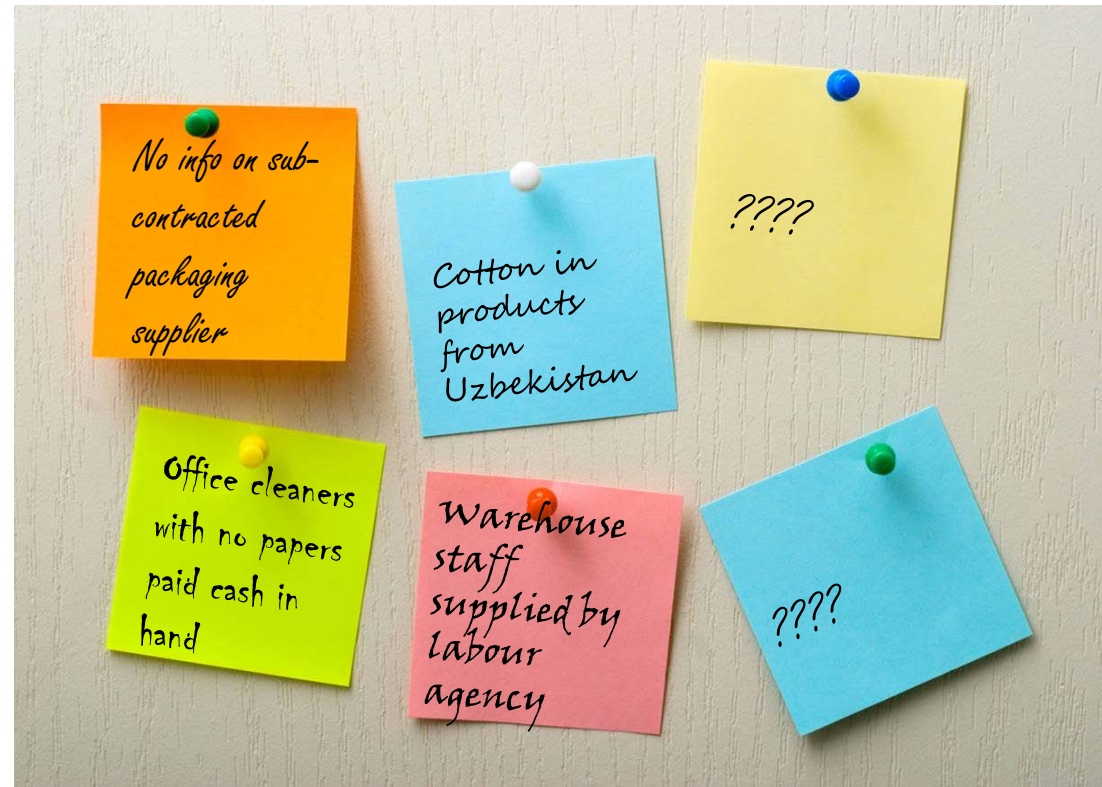
Develop ideas for an outline MSA statement

Human rights and business timeline



Exercise

- Think of a scenario where you think there **could be a risk** of modern slavery in your business – or someone else's business - supply chain, contractors, franchisees, etc
- Stick it on the wall
- Think of some more!



Up to 13,000 victims of modern slavery are trapped in the UK

The Home Office analysis suggests the problem is worse than previously thought

10:28 AM | Saturday 24 November 2018 10:28 AM | 10:28 AM



Modern incidence of slavery

Data from the Walk Free Foundation (2013)

Percentage of the population in slavery, by country

0.0 0.05 0.1 0.2 0.3 0.5 0.75 1.0 2.0 3.0 4.0

What is modern slavery?

29.8 MILLION
ARE IN SLAVERY
IN THE WORLD TODAY

- source: Global Slavery Index



UK world sport football opinion culture business lifestyle fashion environment tech travel

home > world > europe US americas asia australia africa middle east cities development

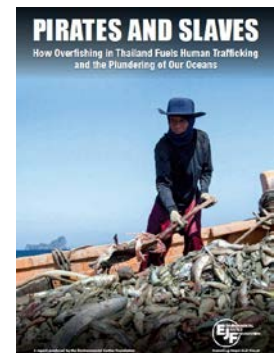
Migration and development
Modern-day slavery in focus

Revealed: trafficked migrant workers abused in Irish fishing industry

Exclusive: Sleep deprivation, inhuman hours and low pay revealed in Guardian investigation of undocumented migrants working on prawn and whitefish trawlers operating from Ireland

Modern-day slavery in focus is supported by:

HUMANITY UNITED
About this content





Technical definitions

Modern Slavery Act
2015

Slavery and forced labour

- Holding another person in slavery or servitude
- Requiring another person to perform forced or compulsory labour (key issues: **menace, threat, involuntary**)

(defined in ILO conventions & European Convention on Human Rights)

Aggravating circumstances

- Vulnerability (such as the person being a child, the person's family relationships, and any mental or physical illness)
- Type of work being performed (exploitation)

Trafficking

- Arranging or facilitating the **travel** of another person with a view to being **exploited**.

(defined in UN Palermo Convention on Organised Crime 2004)

Exploitation covers

- Slavery
- Forced labour
- Sexual exploitation including sexual exploitation of children of children
- Removal of organs



Modern Slavery Act
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- **Commencement:**

- y/e 31 March 2016 first statutory reporters

- **Coverage:**

- Carry on business in UK
- £36m is global turnover
- Can include non-profits
- Non-UK parents and subsidiaries
- Supply chains and own operations

- **Publishing**

- Approved by board, signed by a director
- On website with link from homepage

What could go is in the statement:

a) The organisation's **structure**, its **business** and its **supply chains**

b) Its **policies** in relation to slavery and human trafficking

c) Its **due diligence processes** in relation to slavery and human trafficking in its business and supply chains

d) The parts of its business and supply chains **where there is a risk** of slavery and human trafficking taking place, and the **steps it has taken** to assess and manage that risk

e) Its **effectiveness** in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such **performance indicators** as it considers appropriate

f) The **training** and capacity building about slavery and human trafficking available to its staff

- *Not a compliance statement*
- *"Common sense approach"*



Some questions



- **Who** reports? – UK business only or global group

“Having a UK subsidiary will not, in itself, mean that a parent company is carrying on a business in the UK, since a subsidiary may act completely independently of its parent or other group companies” (Govt guidance)

- **Scope:** how far do you go? – direct workforce, supply chain, contractors, business partners
- Who (and where) is your **audience**?
- How much **transparency**? What are you not happy disclosing?
- How much **detail** do you want to go into? How long?

Key elements of statement



b) **policies** in relation to slavery and human trafficking

- What policies do you have?
- Are they adequate?

c) **due diligence processes** in relation to slavery and human trafficking in its business and supply chains

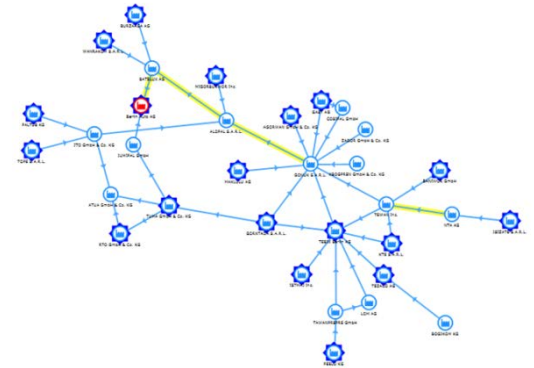
- What processes do you have now?
- Are any issues not covered?
- What extra processes or information might you need?

d) The parts of its business and supply chains **where there is a risk** of slavery and human trafficking taking place, and the **steps it has taken** to assess and manage that risk

- Can you identify these risks?
- Can you identify steps?

Mapping against operations and supply chain

- Where operationally in the business?
- Geography?
- Employment relationships
- Supply chain tier?
- Contractors?
- Do you have enough information to go on?



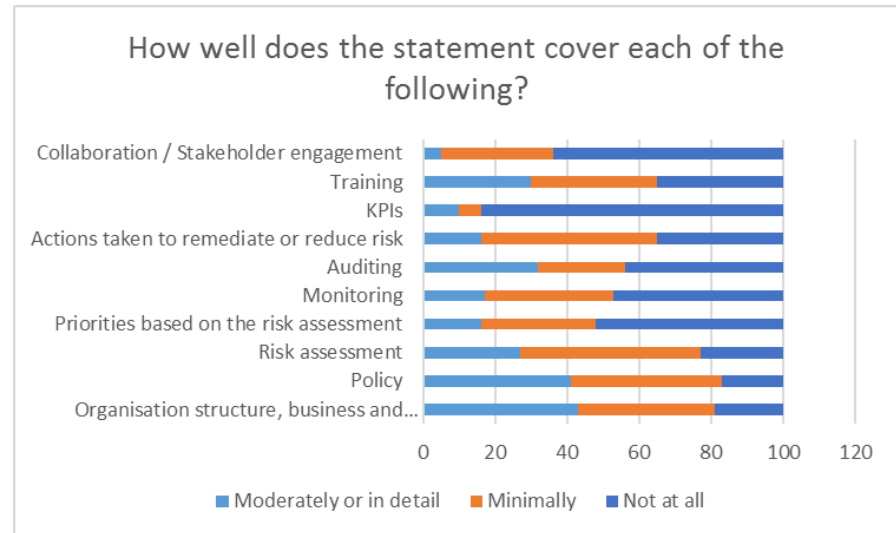
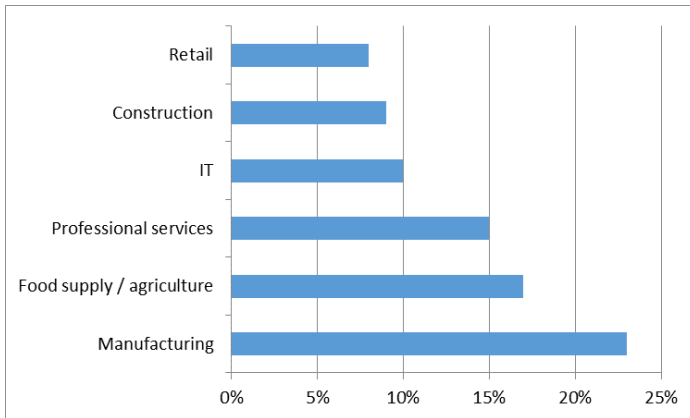
Responding to risk, identifying priorities

For your **high** and **medium** risks:

- Identify common situations/business relationships that contribute to or are associated with the risk
- Identify actions you could take which a) may reduce risk or b) provide you with more information
- Identify who is responsible for taking the action forward
- Identify a timescale and likely resource implications



100 statements analysed



- Most statements are brief (nearly all are under 1000 words and half are under 500 words)
- A significant number refer to the fact that auditing of suppliers takes place, and also report on training for their staff
- However, fewer statements describe the process of risk assessment they use related to modern slavery and fewer still mention outcomes, including identifying high-risk supply chains or geographies
- While there are some good examples of relatively detailed statements, the majority do not go much beyond setting out broad commitments to ensure that there is no modern slavery in the relevant company's supply chains and descriptions of policies to support these commitments.

2. Policies relating to modern slavery

Information needed	Who has it	Timeframe	New action needed?

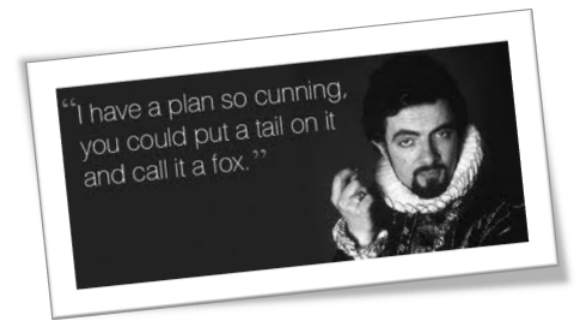
3. Training available and provided

Information needed	Who has it	Timeframe	New action needed?

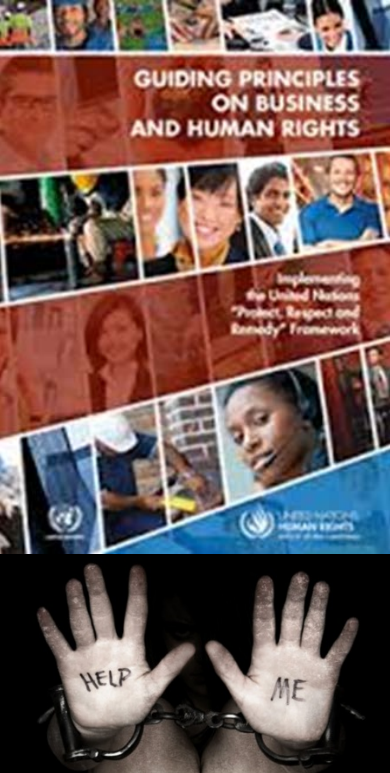
4. Due diligence - principal risks and responses

Information needed	Who has it	Timeframe	New action needed?

We have a plan!



Business area	Specific MS risk	More info needed ?	Actions that are / can be taken to reduce risk	Responsible / by when / KPIs	MSA statement ref.



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