

# stronger together

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**Tackling modern slavery in businesses**  
**A toolkit for UK employers and labour providers**



[stronger2gether.org](https://stronger2gether.org)

September 2020

# WE ARE STRONGER TOGETHER

Stronger Together ([www.stronger2gether.org](http://www.stronger2gether.org)) is a multi-stakeholder collaborative initiative supporting organisations in all sectors to address modern slavery risks within their business and supply chains.

We develop and deliver expert guidance, training, resources and tools that equip and support businesses to deter, detect and deal with the risks of forced labour, labour trafficking and other hidden labour exploitation. We enable collaboration to achieve this at scale on a country-by-country, sector-by-sector basis.

**Our Vision** is for supply chains free from modern slavery.

**Our Mission** is to work together to reduce forced labour, labour trafficking and other hidden third-party labour exploitation of workers in supply chains.

**We are** a not-for-profit social enterprise.

**We use** an internationally proven collaborative methodology, engaging stakeholders at an industry-wide level based on the corporate responsibility to respect human rights within the framework of the UN Guiding Principles on Business and Human Rights.

## OUR ESCAPE GUIDING PRINCIPLES:

1. **Enabling** – removing barriers, engaging leaders and combining local expertise with high-level influence to enable positive behaviour change at scale in supply chains.
2. **Supportive** – a safe platform and support network for businesses to share experience and drive good practice.
3. **Collaborative** – working collaboratively and pre-competitively with businesses and stakeholders in all sectors across domestic and global supply chains.
4. **Accessible** – providing high-quality, relevant, free-to-download, open source resources and cost-effective interactive expert training and e-learning for business.
5. **Practical** – step-by-step, pioneering, solutions-focused guidance and resources for businesses, tailored by country and sector.
6. **Evolving** – continuously improving and developing best-practice tools, materials and programmes to support businesses.

## STRONGER TOGETHER PARTNERS AND SPONSORS



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# HOW TO USE THIS TOOLKIT

This toolkit provides pragmatic guidance, good practice and tools to support responsible UK employers and labour providers to deter, detect and deal with risks of modern slavery and hidden labour exploitation within their own business.

This toolkit will support businesses to implement steps to ensure that slavery and human trafficking is not taking place within “any part of its own business” and to report these, where required, under the Modern Slavery Act 2015 Transparency in Supply Chains etc. reporting provisions S54 (4) (a) (ii).

## SCOPE

This toolkit supports businesses to address risks to its:

- Own workforce
- Agency workers supplied by labour providers to work on its own sites
- On-site contractors working for contracted-out service organisations.

## STRUCTURE

Our Tackling Modern Slavery in Businesses Toolkit is split into three sections:

- **Section A** provides the knowledge required to understand what modern slavery and hidden labour exploitation are and how they impact your business
- **Section B** provides pragmatic guidance detailing the actions and processes you should put in place to tackle these issues. It is centred around our Tackling Modern Slavery Framework and Good Practice Implementation Checklists. The checklists provide a comprehensive list of steps you should take to deter, detect and deal with modern slavery and hidden labour exploitation
- **Section C** provides useful resources and templates that can be adapted to suit your business’s needs to support enhancements to existing labour management systems.

ONE

# SECTION A

## INTRODUCTION AND BACKGROUND CONTEXT



# THE SCALE OF MODERN SLAVERY

Slavery was abolished but never eradicated – no country or supply chain is exempt from the crime of modern slavery.<sup>1</sup>

It is estimated that 40.3 million men, women and children around the world are trapped in modern slavery, whether through human trafficking, forced labour, debt bondage, forced or servile marriage, or commercial sexual exploitation.

Human trafficking is the fastest growing criminal industry in the world, second in profitability only to the drugs trade. The International Labour Organization (ILO) reports that trafficking in persons has an annual trade value of around US\$150 billion.<sup>2</sup>

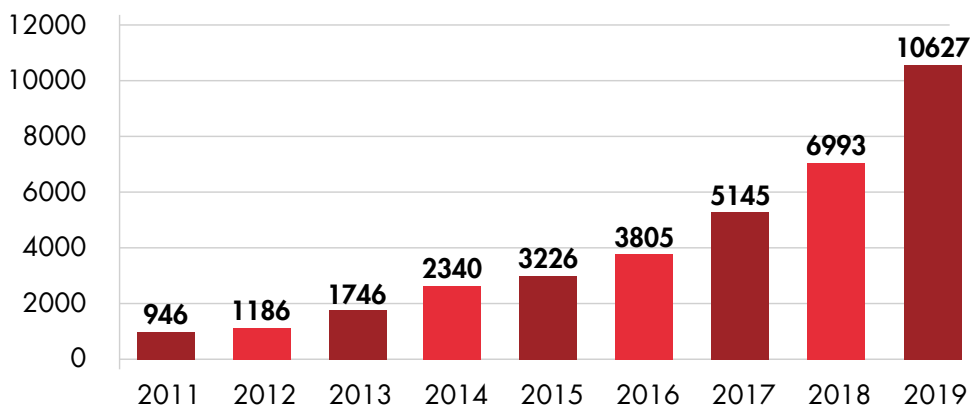
Modern slavery offences permeate the supply chains of global brands and retailers. Organised criminality has identified that the exploitation of workers provides a lucrative business opportunity. Exploiters target labour-intensive and/or unique industry sectors characterised by a high proportion of migrant workers undertaking unskilled and irregular work, who are often supplied through recruitment intermediaries.

## UK FIGURES

Analysis by the Home Office Chief Scientific Adviser in November 2014 estimates that between 10,000 and 13,000 potential victims are held in slavery in the UK.<sup>3</sup> The UK National Crime Agency (NCA) has found this to be only the “tip of the iceberg”<sup>4</sup> and that the true numbers are likely to be substantially higher – in the tens of thousands – as many victims are unable or reluctant to report to authorities or may not be recognised as victims of modern slavery even if they do report.<sup>5</sup>

The Modern Slavery Policy Unit estimate there are at least 100,000 victims in the UK, with the actual number likely to be even greater.<sup>6</sup>

### No. of referrals made to the NRM (by year)



1. [ilo.org/wcmsp5/groups/public/-ed\\_norm/-ipec/documents/publication/wcms\\_586127.pdf](http://ilo.org/wcmsp5/groups/public/-ed_norm/-ipec/documents/publication/wcms_586127.pdf)

2. [http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_243201/lang-en/index.htm](http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_243201/lang-en/index.htm)

3. [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/386841/Modern\\_Slavery\\_an\\_application\\_of\\_MSE\\_revised.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/386841/Modern_Slavery_an_application_of_MSE_revised.pdf)

4. [bbc.co.uk/news/uk-40885353](http://bbc.co.uk/news/uk-40885353)

5. [justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/stolen-freedom-the-policing-response-to-modern-slavery-and-human-trafficking.pdf](https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/stolen-freedom-the-policing-response-to-modern-slavery-and-human-trafficking.pdf)

6. <https://www.centreforsocialjustice.org.uk/library/itstillhappens-here-fighting-uk-slavery-in-the-2020s>

# WHAT IS MODERN SLAVERY?

Modern slavery is a broad term used to encompass the offences of slavery, servitude and forced or compulsory labour and human trafficking.<sup>7</sup> The term extends to slavery-like practices such as debt bondage, the sale or exploitation of children, and forced or servile marriage. While varied in nature, all involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.<sup>8</sup>

Within responsible employers in the UK, such exploitation is predominantly conducted without the business's explicit knowledge and is undertaken by individual exploiters or organised criminal gangs working internally or externally and controlling their victims' work and lives for financial gain using physical and psychological coercive methods.

Below are examples of modern slavery offences and practices that could present within your own business or supply chain.

**Forced labour** is "all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily".<sup>9</sup> It refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.

**Debt bondage** accounts for 50% of forced labour in the private economy.<sup>10</sup> A person becomes a debt-bonded labourer when their labour is demanded as a means of repayment for a loan – often the loan provided to cover the recruitment fee and travel to take up the role. The person is then tricked or trapped into working for very little or no pay, forced to work to repay debts that their employer says they owe, and not allowed to work for anyone else. Debts may be passed onto the next generation.

**Human Trafficking** is the ACT of "recruitment, transportation, transfer, harbouring or receipt of persons, by MEANS of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the PURPOSE of exploitation.

Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs".<sup>11</sup>

In cases of labour trafficking, people are coerced and deceived into travelling across and within country borders to a job that either never existed or is not as stated. The victim may consent to the travel in the search for a better life or the promise of a job to support their families, or where a child is influenced to travel by an adult. The exploitation of the potential victim does not need to have taken place, simply that the movement of the individual was with a view to exploiting them.

**People Smuggling** is the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident.

In people smuggling, the defining feature is helping another person to irregularly enter a country, when this is done for profit. A person can start out as a smuggled migrant, only to find they have been moved into a situation that is inherently exploitative.

7. For a model definition of terms see Article 5. UNODC Model Law against Trafficking in Persons.

8. For a model definition of terms see Article 5. UNODC Model Law against Trafficking in Persons.

9. Defined in 1930 by Article 2 of the International Labour Organization Convention No. 29, and subsequently embedded in the UK-ratified European Convention on Human Rights.

10. [https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms\\_575479.pdf](https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf)

11. Defined in the United Nations Convention against Transnational Organized Crime Protocol to Prevent, Suppress and Punish Trafficking in Persons Article 3, paragraph (a).



# UK BUSINESSES' RESPONSIBILITY TO TACKLE MODERN SLAVERY

Responsible businesses rightly place addressing modern slavery risks in their own organisation and supply chain as a cornerstone of their business and human rights strategy in order to:

- Protect workers and meet moral, ethical and human rights obligations
- Meet legal and transparency reporting obligations
- Demonstrate due diligence in protecting the business's reputation with investors, shareholders, clients and other stakeholders
- Work collaboratively and transparently to lead in bringing an end to modern slavery in supply chains.

In September 2015, all UN member states agreed a set of global goals, the Sustainable Development Goals,<sup>12</sup> to guide development policy worldwide until 2030. Goal 8.7 challenges each and every state and business to "Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms".

## UK MODERN SLAVERY ACT 2015

The Modern Slavery Act 2015, Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 and Human Trafficking and Exploitation (Scotland) Bill Section 1(1) (b) all define that:

**“ a person commits an offence if — the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour. ”**

Importantly, the legal obligation on businesses is that they **“ought to know”**.

The Act requires that, under the Transparency in Supply Chains provisions, all businesses with an annual turnover of over £36 million publish on their website a board approved annual statement detailing the steps taken during the past year to ensure that their business and supply chains are free from slavery and human trafficking. The UK Government has published “Transparency in Supply Chains etc. – A practical guide” to support businesses in these requirements both in law and spirit.<sup>13</sup>

The UK High Court has ruled in a case related to worker exploitation that officers of companies may be personally liable to pay damages if they cause their company to operate in breach of contractual and regulatory requirements, particularly if such breaches seriously harm the reputation or financial viability of their company.<sup>14</sup>

**Addressing the risks of modern slavery in supply chains requires commitment, risk assessment, action, continuous vigilance, monitoring and review. It is neither an easy nor quick endeavour. Stronger Together's purpose is to support businesses in this endeavour.**

12. <https://sustainabledevelopment.un.org/>

13. <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

14. <https://www.business-humanrights.org/en/uk-gangmaster-found-liable-for-first-time-for-victims-of-modern-slavery-in-landmark-high-court-judgment>



# FORCED LABOUR MODELS IN BUSINESS AND SUPPLY CHAINS

The Global Slavery Index estimates that there are 24.9 million persons in forced labour globally,<sup>15</sup> which includes 16 million in private economy sectors<sup>16</sup> including: agriculture and forestry; fishing and maritime; food, garment and general merchandise manufacturing; mining, utilities and construction; domestic servitude; cleaning, catering and hospitality services in hotels, restaurants and bars.

There are four overarching models of forced labour in business and supply chains. Understanding how these models may occur is key to addressing the risk of modern slavery within your business. The Good Practice Implementation Checklists will support the development and implementation of processes and due diligence necessary to identify and deter forced labour within your own operations.

It is important to note that there is often crossover between these models.

## MODEL 1 – STATE CONTROLLED OR SANCTIONED

The State knowingly and deliberately holds or puts workers in a forced labour situation.

For example:

- Forced conscription/prison/work camp labour
- Annual mobilisation of children, public employees, elderly and others to harvest agricultural crops
- Visa systems which have the effect of placing workers into a condition of bonded labour.

## MODEL 2 – EMPLOYER CONTROLLED OR COMPLICIT

The Employer knowingly and deliberately holds workers in a forced labour situation or reasonably ought to know that workers are in these conditions.

For example:

- The employer may work with human traffickers and people smugglers to use workers with no legal right to work in that country or job
- The employer applies conditions to workers such as recruitment fees, debt bondage, wage retention and penalties, contract switching, exceptionally low wages, excessive hours, collusion with undocumented workers and benefit fraud, all of which have the effect of creating a forced labour situation
- The employer outsources its work to illegal or uncontrolled sub-contractors at a price which can only be achieved through criminality and gross worker exploitation
- The employer colludes with a recruiter to be supplied with workers at a cost that can reasonably only have been achieved through workers paying recruitment fees that have the effect of creating debt bondage
- The employer pays a labour provider a charge rate for the supply of workers that can only be achieved through criminality and gross worker exploitation.

<sup>15</sup> [globalslaveryindex.org/2018/findings/highlights/](https://www.global-slavery.com/2018-findings-highlights/)

<sup>16</sup> [globalslaveryindex.org/2019/findings/executive-summary/](https://www.global-slavery.com/2019-findings/executive-summary/)

## MODEL 3 – LABOUR SUPPLY CHAIN CONTROLLED OR COMPLICIT

One or more actors in the labour supply chain knowingly and deliberately holds workers in a forced labour situation or reasonably ought to know that workers are in these conditions.

These can include:

- Labour provider
- Recruiter
- Labour provider sub-agent
- Recruitment sub-agent
- Labour broker.

For example:

- The labour broker/sub-agent may work with human traffickers and people smugglers to source workers with no legal right to work in that country or job
- The labour provider, either through end-user employer complicity or lack of due diligence, is able to apply conditions to workers such as recruitment fees, debt bondage, wage retention and penalties, contract switching, exceptionally low wages, excessive hours, collusion with undocumented workers and benefit fraud, all of which have the effect of creating a forced labour situation
- The recruiter outsources its work to illegal or uncontrolled sub-contractors at a price which can only be achieved through criminality and gross worker exploitation
- The labour provider colludes with a sub-agent to be supplied with workers at a cost that, reasonably, can only have been achieved through workers paying recruitment fees, which has the effect of creating debt bondage
- The recruiter pays a sub-contractor a charge rate for the supply of workers that can only be achieved through criminality and gross worker exploitation.

## MODEL 4 – ORGANISED CRIME GANG/THIRD-PARTY EXPLOITER CONTROLLED

An organised criminal gang or third-party exploiter knowingly and deliberately holds workers in a forced labour situation without the employer's knowledge.

Third parties can include:

- Organised criminal gangs or human trafficking rings
- Individual external exploiters
- Rogue managers or supervisors
- Peers and fellow workers
- Friends and family members.

For example:

- An organised criminal gang recruits and controls vulnerable individuals and forces them to work for legitimate and unknowing employers and recruitment intermediaries
- A rogue supervisor, consultant or worker working for a responsible and legitimate employer or recruitment intermediary controls workers without that business's knowledge
- The third party provides unofficial recruitment services and can apply recruitment fees including charges for transportation, job finding or referral, accommodation or visa administration, all of which have the effect of creating debt bondage
- The third party controls the right-to-work documentation of another individual, preventing them from finding work elsewhere and restricting that person's movements
- The third party controls the bank account of another individual, enabling them to make deductions from their wages, which has the effect of creating debt bondage.

The Organised Crime Gang/Third-Party Exploiter model presents the most significant modern slavery risk to responsible businesses. It is particularly prevalent within the UK and occurs within all types of business.

In this model, the conditions of forced labour are **hidden**. The gang or third party is acting in their own interests, not on behalf of the business.



# WHAT IS HIDDEN LABOUR EXPLOITATION?



Hidden labour exploitation can be defined as the mistreatment of a worker for personal gain, perpetrated by a third party (e.g. fellow workers, rogue labour provider consultants or employer supervisors, individual exploiters or organised criminal gangs).

The exploitation is “hidden” – these practices are not visible to the infiltrated business. There is rarely a paper trail and if there is, it is falsified. There may be indicators or suspicions only and it is difficult to prove on the balance of probability or beyond reasonable doubt.

Hidden third-party labour exploitation occurs within all types of businesses.

Employers and labour providers are often not alert to or are unaware of the signs that this is occurring within their business. Regularly, businesses unwittingly allow recruitment, labour supply and supervisory models that permit such exploitation to flourish. As such, businesses may be vicariously liable for the actions of their staff where the business is shown to be complicit, negligent or naïve.

Examples of hidden labour exploitation include:

- A third party charges the worker a fee for a job referral to an employer or legitimate recruitment intermediary
- A recruitment intermediary makes illegal deductions from a worker’s wages
- A rogue supervisor requires bribes in exchange for guaranteed work
- A rogue supervisor guarantees work for those who use their sub let accommodation
- A recruitment intermediary requires workers to live in substandard or unsafe accommodation and profits from the rental charges.

## HIDDEN LABOUR EXPLOITATION OR MODERN SLAVERY?

It is often difficult to distinguish which practices are a worthwhile economic service, which may be considered hidden labour exploitation, and which are modern slavery. Often, the methods used to manipulate the victim are similar.

To help determine whether a practice constitutes forced labour over hidden labour exploitation, it is helpful to ask two questions:

1. Is the work being performed under the menace of a penalty or threat?
2. Can the person voluntarily choose whether or not to work?



See an example below:

### **HIDDEN LABOUR EXPLOITATION**

A third party charges a fee, in a one-off transaction, to translate a migrant worker's CV and refer them for a job.

In this scenario, the third party is providing an unofficial recruitment service. Individuals should not bear the cost of any charges associated with the recruitment process or pay for access to work. However, the individual in this example has voluntarily requested this service.

### **FORCED LABOUR**

A labour broker charges a large fee for recruitment services and applies interest for every week that it is not paid off. They withhold a worker's right to work documentation as a deposit until the debt is paid.

In this scenario the worker is not able to change jobs and remove themselves from this situation. Without their right to work documentation, they cannot legally find another job. As before, a worker should not cover the cost of recruitment themselves, but in this example they are being held under penalty due to the interest applied and therefore forced to work to resolve their debt.

It is important to understand the difference between modern slavery and hidden labour exploitation, because your response and escalation routes will differ depending on the type of exploitation that has been identified (see [Chapter 15](#) for guidance on creating a response plan for your business).

Regardless of the type of exploitation, it is crucial that your business can identify where a worker is being mistreated. The following chapters will provide insight into who is at risk and what these offences look like in practice.

# WHO IS AT RISK IN THE UK?

## Vulnerable individuals are targeted by exploiters.

Not having the correct immigration status to work legally in the UK puts individuals at heightened risk, however victims rescued within the UK commonly have the legal right to work.

Whilst there are cases of vulnerable UK nationals being exploited, it is predominantly migrant workers who are the victims of forced labour because:

- Their life situation may be such that they must accept any work just to eat and survive
- Their work options are more limited, particularly where they have limited English language skills
- They may expect to pay for work in the UK if it is common practice in their own country
- They are lured by “package deals” – transport to the UK, accommodation and work
- They trust fellow countrymen who make convincing but false promises of being able to arrange regular work and good pay in the UK
- They are targeted by exploiters and criminal gangs who know how to spot “easy victims” who are easier to control.

Very quickly, workers find that the reality of the work and accommodation is not what they were promised, they are trapped at the mercy of their exploiters and control of their life is no longer their own. At worst, they are living in constant terror of thugs or criminal gangs who are threatening their safety and the safety of their families in the UK or abroad.

Victims are inhibited from escape, making a formal complaint and acting as a witness against their exploiters due to:

- Fear of retribution
- Being psychologically damaged by their abuser
- Being managed into debt
- Being trapped through alcohol or drug dependency
- A lack of knowledge of their rights or how to enforce them
- A belief that no-one can or will do anything about it
- The abuse being diffuse and therefore difficult to identify and attribute
- Distrust or fear of state authority
- Fear of deportation
- Self-blame and shame regarding the situation they have got themselves into
- Being used to poor living and working conditions
- Acceptance of the situation as better than nothing
- A belief that the situation is not permanent and a stepping-stone to a better life
- Hope that things will get better
- No access to family or community support.

**In many cases victims are unable to escape or complain and need to be rescued.**

# HOW DO EXPLOITERS CONTROL AND EXPLOIT THEIR VICTIMS?

Organised criminal gangs and exploiters are well versed in the “tricks of the trade” to find, subdue, hold, break, control and maximise the economic return from the “workers” they hold in modern slavery, and make it extremely difficult for victims to escape.

They control their victims and exploit them through a variety of established means, including:

- Identifying and recruiting vulnerable individuals and selling them the dream of a better future, financial security, accommodation and stability
- Providing forged identity documents
- Quickly managing them into financial indebtedness so that they have to work to pay off monies owed for such items as transport, rent and food. Services are provided on the basis of “pay me when you can or when you are working”. This arrangement will immediately put the worker into debt and allow the controller to apply prohibitive “interest” rates that trap the victims into debt bondage.
- Withholding the person’s passport and other identification documents and using their identity to commit benefit and financial fraud
- Isolating individuals by removing mobile phones, money and personal possessions; controlling and monitoring their movement and ability to communicate with others
- Opening bank accounts in their victims’ names. Holding the bank cards to take the victim’s wages and controlling the accounts to go into overdraft; taking out loans, taking items on hire purchase and other such arrangements in their victims’ names
- Forcing victims to apply and work for employers and labour providers without these organisations knowing that the workers are being controlled
- Retaining victims’ wages and exploiting whatever other opportunities there are to maximise revenue from these workers, such as fraudulent claims for benefits and tax credits, bank loans and credit cards
- Maintaining and escalating the debt-bonded relationship, potentially charging for accommodation at levels higher than the amount earned and applying penalties and interest that are never disclosed
- Actual and threatened psychological and physical violence, harassment and intimidation to repay money owed
- Threats of violence against the worker’s closest family if the worker were to leave
- Holding victims in abject poverty and giving them only the bare minimum amounts of food and money to survive



- Threatening to expose the worker to the authorities, e.g. for crimes that they may have forced the victim to commit; because of some alleged immigration status breach or because of the benefit or financial fraud conducted in their name
- Ongoing isolating of victims from contact with others and the local community by transporting them, restricting them to their accommodation, appointing “supervisors” to oversee them and speak on their behalf
- Engendering psychological, social and physical dependency in their victims
- Establishing surveillance and monitoring systems to highlight where their activities may be exposed and rapidly moving workers when there is the potential of exposure.



## CASE STUDY: DANIEL'S STORY

I responded to an advertisement in a newspaper and was brought to the UK by another Polish person who promised me work as a builder as soon as we arrived in the UK.

I was very optimistic and full of hope that I would find a good job with a good wage to be able to support myself. I had nothing back in my country with no family and only a few friends. I had lost my job so was in a desperate state to be able to support myself, and this offer seemed to be a chance of a new life.

The trafficker paid for my transport to the UK but I had to pay the money back. Myself and several other countrymen were picked up outside a supermarket and transported to the UK by minibus and then via the Channel Tunnel.

The trafficker forced me to buy a mobile phone which was taken away from me straight away. I was ordered by the trafficker to have all of my correspondence sent to the trafficker's address and not the address I was living at.

The promised employment never materialised. I was not given any work for two months. I was living with no money to feed myself. I was completely dependent on the trafficker. We were all then forced to work for nothing, being told that we had to first pay back the cost of the travel and accommodation.

I was employed to pack salads at a factory. The trafficker took my ID card away from me when I arrived in the UK and only gave it back to me because the trafficker wanted me to open a bank account so that he could take money out of my account. The trafficker took £50 per week for accommodation, £30 for food and £20 for fuel.

I was assaulted by the trafficker. He punched me on the left side of my face and gave me a black eye.

I was forced to move from the accommodation when the trafficker needed it for other things, and then brought back again. I was entirely dependent on the trafficker for accommodation, food and employment. I had to live where the trafficker told me to because I was told it would be impossible to get anywhere else to live. The house where I lived also housed 6 other people in the same situation as me. It was very overcrowded with no private space. The house was very dirty and unsafe.

**After 3 years of working and living like this, I was rescued by the Police and GLAA and taken to a place where I could recover and be helped to find a good job and support myself, as this is all I ever wanted to do.**



# FORCED LABOUR AND HIDDEN LABOUR EXPLOITATION IN PRACTICE

Understanding how hidden labour exploitation and modern slavery can manifest in your business is a key step to effectively address these risks.

The following are identified ways that exploitative practices occur within businesses, ranging from relatively benign hidden labour exploitation to the most extreme forms of modern slavery. These risks can be addressed by implementing the due diligence contained in the Good Practice Implementation Checklists contained in the next section of this toolkit.

## EXPLOITATION IN THE RECRUITMENT PROCESS

The recruitment process of any business is vulnerable to infiltration by a third party or organised gang, and presents the earliest opportunity to identify any individuals who are being exploited and ensure that they receive support.

- **The Application service**

An individual who has worked in the UK previously, understands the local job market and with good English skills may use social networks to advertise their CV and email introduction service. This service includes writing application emails, completing job application forms and making job referrals on behalf of migrant workers in exchange for a fee. This service is intended to be a fair economic exchange, not for exploitation purposes.

- **Recruitment “cloning” scams**

An exploiter copies an employer’s or labour provider’s logo from their website and fraudulently mocks up job adverts and offer letters, passing themselves off as acting on behalf of that business. At its most extreme, genuine employers’ websites are cloned but with the addition of an online payment portal through which job applicants are required to pay a processing fee.

The fraudster posts these adverts on classified advertisements websites and elsewhere. Jobseekers are dealt with remotely by phone and email but do not actually meet the scammer. Jobseekers pay upfront fees for fraudulent work finding services, transport and related costs.

Jobseekers are informed to report to the employer or labour provider on behalf of whom the scammer is purporting to act at a particular date and time. On arrival, the workers discover that there is no work, and the company has no knowledge of them or the person the workers have dealt with.

- **“Free” workers**

An overseas labour agency sends emails offering to supply workers, legally entitled to work in the UK, free of charge.

If a labour provider or employer does not pay a reasonable economic fee to a labour-sourcing agency to enable there to be a sustainable business model, then it will mean that workers are having to pay to cover their recruitment costs.

- **Recruitment fees**

Exploiters charge recruitment fees to place jobseekers into conditions of debt bondage and extract extortionate sums of money from them. They may provide a loan to cover the cost of the fees and apply interest, forcing their victims to work to pay off their debts.

Debt bondage caused through the charging of recruitment fees and related costs puts more workers into forced labour than any other practice.

In the UK it is unlawful to charge a fee to a worker for any work-finding services or make providing work-finding services conditional on the worker using other services of hiring or purchasing goods.

In many countries, though, it is still legal to charge job applicants for work-finding services. As a result, migrant workers may be unaware that they are not required to pay any recruitment-associated costs. Third parties utilise this lack of knowledge to make easy money.

For additional guidance on eliminating recruitment fees, see <https://responsiblerecruitmenttoolkit.org/>.

- **Charging jobseekers**

As well as charging UK labour providers/employers recruitment fees for the supply of workers, a profiteering agency also charges jobseekers for services for which there is no real choice, that may not be required, that may be overpriced or which may be entirely false. These chargeable services may be stated as being optional, but they are so integral to the work-finding process that they are in fact a work-finding charge.

These may include:

- Providing information, advice and guidance on job vacancies
- Checking documents required as part of the recruitment process, interview and assessment fees
- Completing documents required as part of the recruitment process
- Charging for translation of standard documents
- Sending documents to the hiring employer or fees associated with guaranteeing a placement or work for the following season.

Where additional goods or services are offered to jobseekers by labour sourcing agencies and labour providers, they must be:

- Genuinely optional, meaningful and distinct from activities necessary for finding a person work
- Properly explained so that jobseekers understand that goods or services offered to them are optional
- Structured so that jobseekers who take them up are not favoured or receive preferential treatment compared to those who do not take up the offer.

- **Recruitment kickbacks and bribes**

A manager with the authority to decide which workers obtain work enters a bribery arrangement with a labour provider or labour sourcing agent. There may be no visible or contractual arrangement. As a simple example, the agent may charge workers £500 for a job with the labour provider or employer. The corrupt manager receives £250 for each worker that s/he places.

- **The Introduction Service**

Refer a friend schemes are an effective means of sourcing new job applicants. However, businesses need to be alert to the risks of how these schemes may be exploited by third parties or rogue colleagues and to relying on informal recruitment and referral mechanisms.

This person may have worked in your business for a number of years. They will usually speak good English and are well connected in a local community of migrant workers. They may position themselves as the migrant workers' friend or good Samaritan. They may escort workers to the labour provider and/or employer's place of work, describing him/herself as a friend or relative, often acting as a useful interpreter looking to help his fellow countrymen find work.

Initially these services may be offered as a genuine interest or as a favour. Over time, however, this individual may see this as an opportunity to earn increasing sums of money from jobseekers and workers. There may be varying levels of coercion, force and intimidation used, evolving from hidden labour exploitation to modern slavery offences.

This individual, when introducing workers, may actually be operating in the capacity of employment agent or gangmaster and is consequently subject to the relevant UK legislation. Where this individual is acting in this capacity with the knowledge of the labour provider they work for or the end user employer, they too are subject to the relevant legislation.

- **The “all-inclusive service”**

The “all-inclusive service” covers all the needs of documented and undocumented migrant workers to enter and settle in the destination country, providing door-to-door transport, accommodation, NI card, bank account and health registration. This may include a people-smuggling service, enabling the illegal and/or irregular entry of persons into a state that they do not have the legal right to enter, remain or work. They may provide high-quality forged or fake identity documents. This service also covers obtaining work, managing job offers, providing imposters to sit entrance exams and providing fake or facilitated work documents such as Construction Skills Certification Scheme cards and forklift truck licences.

As with any business done for profit, the more money paid, the increased quality and range of services that can be purchased. However, this is a criminal industry and a smuggled migrant’s journey may end in exploitation or tragedy.

## IN-WORK EXPLOITATION

There are many opportunities to enact exploitative practices throughout the day-to-day operational activities of a business (see Association of Labour Provider’s report ‘How unfair procurement practice is driving agency labour exploitation’<sup>17</sup> for a comprehensive list of such practices). Operating without the explicit knowledge of their managers, a rogue employer supervisor, worker or labour provider consultant may be working alone, colluding with others or in association with an external gang to exploit workers for personal gain.

- **Wage theft**

The labour provider, contractor or employer may:

- Not pay for all hours worked
- Not pay the agency worker at the rate charged to the client
- Underpay or not pay holiday pay
- Not pay statutory sick pay
- Charge for workwear, accommodation or transport that takes pay below minimum wage.

Services may be provided to workers but are made compulsory, are misleading or are charged for at inflated rates where the labour provider or employer seeks to profit at the expense of its workers. Such services may include personal accident insurance or prepaid cards where the business receives a kickback from the service provider.

Wage theft may also be conducted without the employer’s knowledge.

An individual with good English language skills may be seen as an asset and used as an unofficial translator and organiser. This individual may claim special connection with the labour provider or employer managers and claims to, or actually has, the authority to organise work for fellow workers. S/he may be the minibuss driver who has the power to choose who gets on the bus to work and who does not. The individual may require payment or other favours for services provided. They may take a fee for organising work/transport etc. either directly or through a third-party contact.

17. <https://labourproviders.org.uk/resources/how-unfair-procurement-practice-is-driving-agency-labour-exploitation-toolkit/#:~:text=%20How%20Unfair%20Procurement%20Practice%20is%20Driving%20Agency,will%20also%20enable%20you%20to%20receive...%20More%20>

- **Work allocation kickbacks and bribes**

Specific individuals within a business have the power to decide who works and who does not. They may also determine what role or activity they perform, how regularly they work and whether their application for extra hours or a permanent role is accepted. These positions of power can enable opportunities for exploitation, for example requiring favours or cash payments to guarantee favourable outcomes.

A rogue employer supervisor may be responsible for which agency or casual workers get work, overtime or get transferred from temporary to permanent status. Agency or casual workers can be required to pay cash bribes or kickbacks from wages and/or a placement fee before each shift. The supervisor ensures that he remains close to these workers if anyone in authority attempts to speak to them.

A rogue labour provider consultant may be responsible for which agency workers get work each shift, get side-lined or terminated, get the better paid or more regular jobs. They may be able to fraudulently amend timesheets to add hours or ghost workers. They may implement a regular turnover of workers where an upfront bribe for work is used. They may require a bribe for guaranteeing work next season.

*“ The big issue is not with agencies but within agencies. There’s a natural tendency to get somebody that’s been there quite long-established, and they put them in as a supervisor, same nationality... but they’re in a very powerful position because they’re the conduit through which the workers, if their English is poor, have to access anything. And those people may be taking money off people, may be bullying people, and it’s at the level below the formal agency. ”*

Gangmasters and Labour Abuse Authority

## **ACCOMMODATION-BASED EXPLOITATION**

The provision of accommodation as part of a job placement can also be manipulated to enable the exploitation of workers.

Accommodation may be unhygienic, unsafe, unlicensed and overcrowded. There may be no licence or tenancy agreement in place. Workers may be charged at an inflated rate for the accommodation with minimal reinvestment into maintenance of the facilities provided.

Access to work with the labour provider or employer may be dependent on using a connected person’s accommodation, with threats of no work if the worker leaves the accommodation and eviction if the worker leaves the job.



# SPOTTING THE SIGNS OF EXPLOITATION IN VICTIMS

There is no set number of signs that will indicate that a person is a victim of modern slavery offences or labour exploitation. Some may be more prevalent than others, and each case should be considered on an individual basis.

The following are indicators of exploitation and should be considered within the context of the other evidence.<sup>18</sup> Chapters 15 and 16 provide guidance on what action to take when such signs have been identified.

## PHYSICAL APPEARANCE

Exploited applicants and workers may show signs of physical or psychological abuse and/or appear:

- Malnourished
- Dirty, due to lack of access to basic washing facilities at their imposed accommodation
- Frightened, anxious, withdrawn, confused
- To have injuries that seem to be the result of an assault.

## FEW OR NO PERSONAL EFFECTS

Exploited workers may have:

- No money
- No personal items, e.g. purse, wallet, jewellery
- With limited or no money to buy clothes, they may wear the same items all the time, or wear clothes that are unsuitable for work
- Little or no food.

## ISOLATION AND CONTROL

Exploited workers are rarely left to be on their own and may seem under the control and influence of others, for example:

- Others present their identification documents and speak for them at recruitment
- Others try to book them onto shifts or speak on their behalf when answering calls, whether they are available to work or not
- One person speaks on behalf of a number of workers and the victims look to him/her for support or permission
- They are taken to work and back, e.g. a driver may drop them off and collect them.

## RELUCTANT TO SEEK HELP

Exploited workers may be reluctant to seek help and may:

- Avoid eye contact and appear frightened
- Be afraid to talk and reject help when offered – this is often because they do not know who to trust or fear retribution.

18. See also Gangmasters and Labour Abuse Authority "Labour Exploitation – Spot the signs" <https://www.gla.gov.uk/media/3178/spot-the-signs-glaa.pdf>.

18. A toolkit for UK employers and labour providers

# THE NATIONAL REFERRAL MECHANISM: THE UK FRAMEWORK FOR VICTIM SUPPORT

The National Referral Mechanism (NRM) is the UK's framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support.

Potential victims of trafficking or modern slavery are referred to the Home Office Single Competent Authority (SCA), which is responsible for all NRM decisions. Referrals are made by an authorised 'first responder' agency such as a police force, the NCA, the UK Border Force, UKVI, the Gangmasters and Labour Abuse Authority, Social Services Local Authorities and specified NGOs.

Engagement with the UK criminal justice system is not a pre-requisite for a potential victim to be referred to the NRM.

## OVERVIEW OF THE NRM

### STAGE ONE – “REASONABLE GROUNDS”

The SCA has a target date of 5 working days from receipt of referral in which to decide whether there are reasonable grounds to believe that the individual is a potential victim of human trafficking or modern slavery. The threshold is “from the information available so far I believe but cannot prove” that the individual is a potential victim of trafficking or modern slavery.

If the decision is affirmative then the potential victim will be allocated a place within Government-funded safe house accommodation if required, with a reflection and recovery period of 45 calendar days. This allows the victim to begin to recover from their ordeal and to reflect on what they want to do next, for example, co-operate with police or return home.

# STAGE 1



# STAGE 2

## STAGE TWO – “CONCLUSIVE DECISION”

During the 45-day reflection and recovery period, the SCA gathers further information to make a conclusive decision on whether the referred person is a victim of human trafficking or modern slavery. The timescale for making a conclusive grounds decision is not guaranteed and the threshold is that, on the balance of probability, “it is more likely than not” that the individual is a victim of human trafficking or modern slavery.

The first responder and the potential victim will both be notified of the decision. If the potential victim is conclusively identified as a victim of trafficking or modern slavery, what happens next depends on their wishes.

**Co-operating with police enquiries** – The victim may be granted one year’s discretionary leave to remain in the UK to co-operate fully in any police investigation and subsequent prosecution. The period of discretionary leave can be extended if required.

**Other circumstances** – If not involved in the criminal justice process, the Home Office may consider a grant of discretionary leave to remain in the UK, dependent on the victim’s personal circumstances.

**Returning home** – If from outside the EEA, the victim can receive help and financial assistance to return home through the Assisted Voluntary Return of Irregular Migrants (AVRIM) process. If they are an EEA national, support organisations will put them in touch with their embassy and any relevant NGOs who may be able to help.

**If the referred person is not found to be a victim** – Dependent on the circumstances, the individual may be referred to the relevant police force or Home Office. If there are no other circumstances that would give them a right to live in the UK, they will be offered support to voluntarily return to their country of origin.

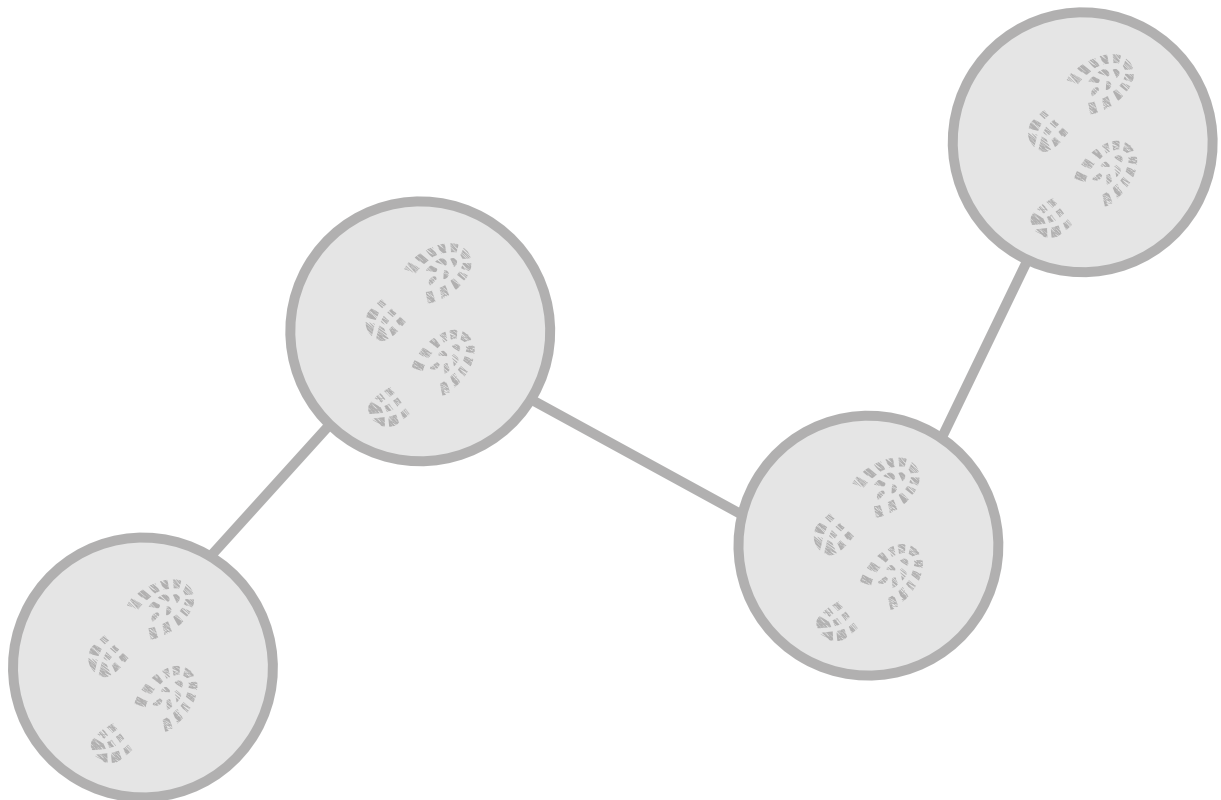
It should also be noted that a person can be identified as a potential victim of trafficking under the National Referral Mechanism without any further criminal investigation being undertaken. The primary concern is the safety and welfare of the potential victim. The decision on any investigation is taken separately.

To gain an overview of the National Referral Mechanism (NRM), the UK framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support, please visit:

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>.

# SECTION B

## PRACTICAL STEPS TO ADDRESS MODERN SLAVERY RISKS





# HOW TO GET YOUR BUSINESS STARTED IN ADDRESSING MODERN SLAVERY RISKS

To get started in addressing the risks within your business:

1. Read this Stronger Together toolkit.
2. Register on [stronger2gether.org](https://stronger2gether.org) and download free posters, leaflets, induction presentation, training videos, surveys, questionnaires, policies etc.
3. Complete the relevant “Good Practice Implementation Checklist”. Use this to identify what due diligence is currently in place and what additional activity is required.
4. Determine your organisational training needs – see [stronger2gether.org/workshops/](https://stronger2gether.org/workshops/) for a range of face-to-face and online training opportunities for different sectors and roles.
5. Implement the actions in the “Good Practice Implementation Checklist” and regularly review your actions against toolkit guidance.
6. Demonstrate your organisation’s commitment to addressing the risks of modern slavery by becoming a Stronger Together Business Partner – see [stronger2gether.org/business-partners/](https://stronger2gether.org/business-partners/).
7. Monitor overall strategic progress made in addressing modern slavery risks within your business and supply chain using the Stronger Together Progress Reporting Tool – see [stronger2gether.org/prt/](https://stronger2gether.org/prt/).

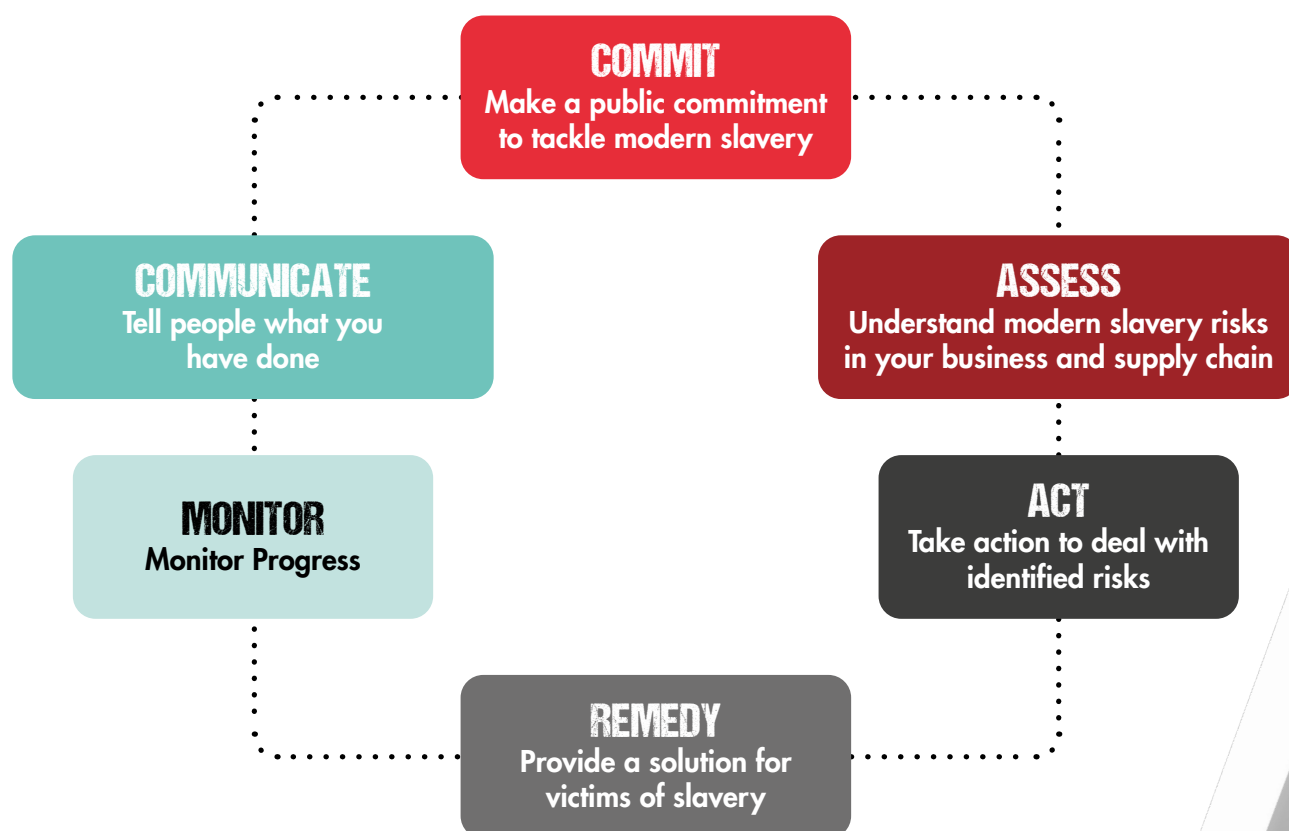
**If you have any suspicions about potential human trafficking, forced labour or any other hidden labour exploitation, please notify the Gangmasters and Labour Abuse Authority on 0800 432 0804 or the police (999 only in an emergency).**

**Alternatively, contact the Modern Slavery Helpline on 08000 121 700.**

TWELVE

# A STRATEGIC FRAMEWORK TO TACKLE MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION

The recommended due diligence approach that businesses should adopt to address modern slavery risks is detailed below:



Make a commitment to tackle modern slavery. Assess the risk in your business and supply chain. Take the action required to address these risks. Provide remedy for any victims identified. Monitor the progress made by your business and communicate with others to demonstrate what and how you are doing.

Adopting this framework enables businesses to maintain an effective ongoing risk management process.

## THIRTEEN

# GOOD PRACTICE IMPLEMENTATION CHECKLISTS

The following Good Practice Implementation Checklists provide a list of operational and management processes that may be implemented by businesses to deter and/or identify modern slavery and hidden labour exploitation.

These checklists enable you to assess how prepared your business is and provide an action plan for processes still required to be put in place.

They form a number of the actions that a business may report under the Modern Slavery Act 2015 S54 Transparency in Supply Chains etc. provisions as steps taken to ensure that slavery and human trafficking are not taking place in its own business or labour supply chain.

Addressing modern slavery and hidden labour exploitation risks in your business is an ongoing process. The actions captured in these checklists should be revisited regularly to ensure that due diligence is maintained and remains effective.

## HOW TO USE THE CHECKLISTS

There are two checklists available: 1 for labour providers or recruitment businesses and 1 for employers.

An interactive PDF version of both checklists is available from the Stronger Together website [www.stronger2gether.org/resources](http://www.stronger2gether.org/resources).

- Appoint a team to complete the relevant checklist. You should consult colleagues from a variety of functions or departments across your business / site.
- Employers should complete a checklist for **each operational site** in the business. Appoint an owner for this document and maintain 1 official copy per site.
- Read through the checklist and determine which of the steps are relevant for your business / site. Assign a score against each of the actions to reflect the level of implementation. **Where an action is not applicable to your business, note this as N/A.**
  - Where a site is aware these actions have been completed at an organisational level, they should provide a score to reflect implementation.
- Review the scoring regularly and track progress made over time.

SCORE	EXAMPLE
0 = not implemented/don't know	No members of the site management team have attended an awareness training session
1 = partially implemented	Some members of the site management team have attended an awareness training session
2 = fully implemented	All members of the site management team have attended an awareness training session

**For every N/A, deduct 2 points from the total maximum score to scale your completion %.**

Divide the score you have assigned by the total maximum score to get your percentage completion rate.

**Scored 60 out of 116 total maximum points. (60 divided by 116) x 100 = 52%**

# LABOUR PROVIDER/RECRUITMENT BUSINESS GOOD PRACTICE IMPLEMENTATION CHECKLIST

N.B. Download this checklist as an interactive PDF form at [stronger2gether.org/resources/](https://stronger2gether.org/resources/).

Company Name ..... Site .....

Computer Name ..... Email .....

Date: .....

## SCORING SYSTEM

N/A = if not applicable

0 = if not implemented/don't know

1 = partially implemented

2 = fully implemented

## COMMIT TO TACKLE MODERN SLAVERY RISKS IN YOUR BUSINESS

## SCORE

### Team appointment and role definition

- |   |  |  |
|---|--|--|
| 1 | A member of the most senior management level within your business has been made explicitly accountable for ensuring that ethical labour standards are applied and for protecting the human rights of those working in the business. This includes a specific responsibility for preventing and addressing modern slavery risks.                      |  |
| 2 | A senior manager has been appointed as the business "Modern Slavery Lead", to lead the implementation of operational due diligence steps to reduce and address the risks of modern slavery and hidden labour exploitation throughout your business.  |  |
| 3 | A multi-departmental team has been appointed to co-ordinate and oversee the implementation of operational due diligence steps across your business to address the risks of exploitation.   |  |
| 4 | Managers at each branch and site where agency workers are deployed have been appointed to lead the implementation of operational due diligence steps to address the risks of exploitation.   |  |
| 5 | A "Workforce Incident Management Team" has been appointed, including "Investigating Managers", that is ready to respond to serious workforce issues during any hours when agency workers are deployed.   |  |
| 6 | A remediation team has been appointed to deliver the remediation programme for your business. The team should include representatives from the workforce, managers, trade unions (if active in the workplace), specialists and local NGOs with expertise in modern slavery where available.  |  |
| 7 | A "Modern Slavery Champion(s)" has been appointed to maintain peer engagement and raise awareness of modern slavery and hidden labour exploitation within the general workforce.   |  |
| 8 | The individual roles and responsibilities of HR and payroll, Department/Functional Heads, Workforce Incident Management Team members, Investigating Managers, Trade Union/Employee Reps and Welfare Officers to support operational due diligence steps addressing exploitation risks have been defined and communicated to the relevant colleagues. |  |
| 9 | The roles and responsibilities of recruiters and consultants in spotting the signs of exploitation and how to handle and report suspected cases have been explicitly defined and communicated to them.   |  |

## Establish effective management systems

- 10 Your business has developed and implemented a "Tackling Modern Slavery and Hidden Labour Exploitation" policy, which details the processes it will take to prevent these practices, and the steps it will take where they are identified (see [Appendix 1](#)).
- 11 Your business has developed and implemented a Code of Practice for the Responsible Sourcing and Supply of Workers (see [Responsible Recruitment Toolkit](#)).
- 12 Your business can demonstrate that its anti-bribery and corruption policies are agreed, applied and complied with.
- 13 Your business charges clients a sufficient rate to cover statutory wage factors, overhead costs and account servicing costs plus a sustainable net margin that allows your business to meet its obligations with regards to achieving ethical labour standards practices and for reducing and addressing modern slavery and hidden worker exploitation risks.
- 14 Your business can demonstrate that it has issued its managers, supervisors and recruiters with written notification that accepting bribes or inducements to recruit or favour workers or to commit any form of physical or mental worker mistreatment, coercion, bullying or harassment is prohibited and will be investigated as a potential gross misconduct offence (see [Appendix 2](#)).
- 15 Your business has developed and implemented a "Workforce Incident Procedure" to ensure proper handling of serious issues at work. This includes issues such as violence, abusive behaviour, bullying, bribery, corruption, discrimination, harassment, victimisation, modern slavery and hidden labour exploitation. Your business can demonstrate that colleagues are aware of and use this process, and that management record and deal with reports appropriately.
- 16 Your business has an established system to be able to rapidly conduct background worker HR and payroll records checks.
- 17 Your business has developed a "Modern Slavery Response Plan" that details how supervisors and managers will respond immediately on being alerted to potential indicators that an individual or group of workers on site may be subject to exploitation or unfair treatment (see [Chapter 15](#)).
- 18 Your business has an established process for using trusted interpreters, a telephone translating line or digital translation devices at immediate notice to have conversations with workers who speak little English.
- 19 Your business has formalised how investigations into suspected cases of modern slavery and hidden labour exploitation will be conducted in collaboration with all clients, incorporating the steps within the "Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain" where relevant (see [Appendix 9](#)).
- 20 Your business has established relationships with local GLAA Officers and Police, knows which modern slavery charities, care providers and safe homes work in your area, understands the role of the NRM, Modern Slavery Helpline, Salvation Army and Migrant Help with regards to victim protection and support, and understands how to interact with these, should you uncover suspected hidden labour exploitation or forced labour. (See <https://www.humantraffickingfoundation.org/support-services>)
- 21 Your business has developed and implemented a specific "Remediation Policy" that details the provision of remedy to any identified victims. This policy has been developed in accordance with the principles of good remediation practice (see [Chapter 16](#)).

## Training to build capacity and capability (see [Appendix 3](#))

- 22 Your most senior management team has attended an awareness session to ensure that they understand their accountabilities for protecting the human rights of those working in their business, including for preventing and addressing modern slavery and hidden labour exploitation risks.



23	Each appointed Site Lead and branch/site management team has attended appropriate training to be competent and capable of implementing steps to reduce and address the risks of modern slavery and hidden labour exploitation.	
24	The HR and payroll team, Department/Functional Heads, Workforce Incident Management Team members, Trade Union/Employee Reps and Welfare Officers have received appropriate training to ensure that they understand and can fulfil their roles to reduce and address the risks of modern slavery and hidden labour exploitation.	
25	Recruiters and consultants have received appropriate training so that they are clear how to spot the signs of exploitation and how to immediately handle and properly report suspected cases.	

## ASSESS – UNDERSTAND THE RISKS OF MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION WITHIN YOUR BUSINESS

SCORE

### Map operations and the labour recruitment process

26	Your business has listed all the offices, branches, on-site operations and client sites to which agency workers are deployed.	
27	For each of these sites, you have mapped and identified the risks in your labour recruitment process. This should include: <ul style="list-style-type: none"> <li>• How workers are sourced</li> <li>• Whether second-tier labour providers are used</li> <li>• Whether labour sourcing agents are used</li> <li>• Whether other workers introduce job applicants.</li> </ul>	
28	If second-tier labour providers or sourcing agents are used, your business has listed the names, organisational details and key management contacts of all of these businesses. You have categorised these by risk depending on the types and vulnerabilities of worker supplied.	
29	Your business has mapped and identified any contracting companies used, for example construction, transport, catering, cleaning, security, facilities or waste processing. You have captured the labour sourcing process for each of these contractors and categorised these by risk depending on the types and vulnerabilities of workers.	

### Identify risk and prioritise action

30	You have performed a risk assessment for all sites, second-tier labour providers and contractors identified in steps 26-29 (see <a href="#">Appendix 4</a> ). You have considered where you have the greatest presence of vulnerable workers (see <a href="#">Chapter 7</a> ) and recruitment models that could be infiltrated by third parties (see <a href="#">Chapter 9</a> ).	
31	Using the risk assessment, you have identified priority areas to implement operational due diligence measures and developed an action plan based on the steps in this Good Practice Implementation Checklist.	

## ACT – TAKE ACTION TO PREVENT AND DEAL WITH IDENTIFIED RISKS

SCORE

### Workforce engagement

32	Your business has issued all workers with a “Stronger Together” multi language leaflet to raise awareness of how to recognise and report hidden exploitation.	
33	Your business utilises the “Stronger Together” posters, displaying them on notice boards and other places where they may be viewed by all workers.	
34	Induction training for new workers is paid and includes a section on how to recognise and report the indicators of forced labour and hidden worker exploitation.	

35	All existing workers have been trained on how to recognise and report the indicators of forced labour and hidden worker exploitation.	
36	Recruiters and consultants are trained to spot the signs that may indicate potential worker exploitation and how to report any concerns to appropriate managers. Indicators include: <ul style="list-style-type: none"> <li>• Workers delivered and collected from work where transport and drivers raise cause for suspicion</li> <li>• Unusual and abnormal behaviour of workers</li> <li>• Workers appear frightened, agitated, secretive</li> <li>• Workers appear to be instructed by another</li> <li>• An individual speaks on behalf of others regularly</li> <li>• Workers show signs of injury and/or malnourishment</li> <li>• Workers have few personal effects, little money or food</li> <li>• A group of workers who may live, work and travel together stop coming to work for no particular reason.</li> </ul>	
37	Regular briefings and a variety of engagement activities are conducted with your workforce to ensure that the risks and responses to hidden labour exploitation and modern slavery are kept current and live. (See <a href="#">Stronger Together Resources</a> and <a href="#">Just Good Work</a> )	
38	Your business engages with recruiters and consultants to ensure that they are confident in identifying, deterring and reporting forced labour and hidden labour exploitation, and that they are trained and instructed to whistleblow where they have a concern over another manager, colleague or client supervisor, and to facilitate two-way collaborative discussions about how arrangements and activities to address exploitation risks may be improved.	
39	Modern slavery and hidden labour exploitation are agenda items during regular progress/health and safety meetings with trade union and/or employee representatives to collaboratively review and improve your informal and formal approaches to identifying, deterring and reporting these issues.	
40	Where formal worker representation arrangements exist, your business engages with worker representatives (and where these do not formally exist, speaks with groups of workers) to work collaboratively to determine if there may be any issues of exploitation and to discuss whether there are any ways that the business can improve its processes or better engage with workers in its activities to address these risks.	
41	Your business engages with local NGOs, migrant worker support groups or other worker welfare organisations to speak to workers in their native language in a supportive manner to identify if there are any issues.	

### Recruitment good practice

42	Your recruitment process establishes all of the following: <ul style="list-style-type: none"> <li>• Right to work and the statutory excuse</li> <li>• The person presenting is the person in the identity documents</li> <li>• Applicants have control over their own identity documents</li> <li>• How the applicant found out about the job</li> <li>• Applicants have not paid anyone, or will not have to pay anyone, to obtain the job</li> <li>• Applicants have not paid anyone, or will not have to pay anyone, to get to the UK (if newly arrived)</li> <li>• The person arriving for work is the person recruited.</li> </ul>	
43	Your recruitment process establishes the mobile phone number of the job applicant, that they have their mobile phone at interview, tests the number provided and checks that this is their genuine mobile phone and not a burner phone provided for the interview.	

44	Your recruitment/induction process establishes that next of kin details provided are genuine and can be contacted.	
45	Your recruitment/induction process records a landlord's name and verifies the worker's address by asking to see a rent book or contract. Recruiters are trained and instructed to report where a worker rents from a landlord who works for the employer or labour provider.	
46	Your business can demonstrate that worker application documents may not be removed from the recruiting office and must be completed in sight of the recruiter. Where an applicant is unable to complete this on their own, then the recruiter will help them, and by doing so establish their language capability.	
47	All recruiters have been trained to recognise and report indicators of exploitation throughout the recruitment and induction process. All recruiters conduct the required checks and report concerns, even in peak periods, including where: <ul style="list-style-type: none"> <li>• Registration documents appear to have been removed from the office and completed externally</li> <li>• Applicants are introduced by a 'representative', often of the same nationality</li> <li>• An individual speaks on behalf of others, controls the conversation and waits while individuals are being interviewed</li> <li>• Application documents are brought in by one individual on behalf of friends and family</li> <li>• Application documents are in a better standard of English than the job applicant possesses</li> <li>• Multiple application documents have been completed in the same handwriting.</li> </ul>	
48	Your business has processes in place to prevent individuals, however seemingly well-intentioned, to introduce significant numbers of workers for work (accepting that occasional word of mouth "Refer a Friend" introductions to close friends and family are likely to be harmless).	
49	Your business can demonstrate that any literacy, numeracy or other testing is conducted in a controlled environment to prevent manipulation with a format that is regularly changed to prevent coaching of individuals.	
50	Your business can demonstrate that increases in labour demands from clients, such as during seasonal peak periods, do not impact on the delivery of good practice during recruitment as described in this checklist.	

### Labour sourcing good practice

51	Your business is clear about its labour sourcing supply chain and has notified and agreed the labour sourcing methods, channels, labour sourcing agents and second-tier labour providers used with your clients.	
52	Your business applies appropriate due diligence in the appointment of labour sourcing agents and other sourcing channels, to establish their credibility and legitimacy, including where appropriate audit and certification (see " <a href="#">7 steps to embed Labour Provider Due Diligence and Responsible Recruitment</a> " and " <a href="#">Good Practice Checklist for using UK Labour Providers</a> ").	
53	Your business has implemented an effective system to prevent the unauthorised appointment of second-tier labour providers or labour sourcing agents.	
54	Your business has implemented an effective system throughout your labour supply chain to ensure that no fee or cost for recruitment will be charged to workers (see Responsible Recruitment Toolkit " <a href="#">Guide to Eliminating Worker Paid Recruitment Fees and Related Costs</a> ").	
55	Your business requires labour sourcing agents and second-tier labour providers' relevant staff to attend the <a href="#">Stronger Together Tackling Modern Slavery in Business training workshop</a> .	

- 56 Your business holds progress updates with labour sourcing agents and second tier labour providers where you jointly review their completion of the Labour Provider Good Practice Implementation Checklist and use this as a basis for collaboratively identifying and addressing risks of modern slavery and hidden labour exploitation.

### Operational good practice

- 57 Your business has a written procedure to ensure that the allocation of work on particular shifts/overtime to your pool of agency workers is done in a fair and objective, transparent and non-discriminatory way and that this is communicated and understood by workers and your clients.
- 58 Your business has agreed with all clients the appropriate documentation that will apply to agency workers, including:
- Contractual Terms of Business
  - Service-Level Agreement
  - Key Information Document
  - Worker Assignment Details Form
  - Worker Handbook.
- 59 Your business ensures that only nominated and suitably trained client managers have the authority to book agency workers, and that this relies on the labour user specifying the number of skills/roles required and not named individuals. Situations where workers congregate in the hope of work and supervisors pick from this group are avoided.
- 60 Your business ensures that the responsibility for the selection and allocation of which workers can work on each shift on each day is:
- Only undertaken by trained, trusted and supervised consultants
  - Not delegated to a temporary worker, working with the team, who operates with little control or supervision
  - Rotated from time to time.
- 61 Recruiters and consultants are trained and instructed to report and record where:
- An individual appears to be answering phone calls on behalf of others
  - An individual is accepting work shifts on behalf of others and/or is requesting work on behalf of others
  - Registered workers keep turning up to see if work is available and appear to be accompanied by an individual(s) overlooking their behaviour.
- 62 Your business has agreed with all clients the senior manager to whom the labour provider should report and deal confidentially with on matters of potential harassment or discriminatory, unreasonable or suspicious actions by supervisors etc., and where there are indicators of modern slavery or hidden labour exploitation.
- 63 Your business demonstrates that it has agreed with clients a fair, transparent, non-discriminatory and merit-based vacancy notification and selection process to enable agency workers to apply for and obtain directly-employed roles with your clients.

### Proactive checks

64. Your business systematically checks **all** of the following for "Alert Flags" and acts accordingly on the information:
- Addresses of its workers and job applicants for high occupancy of particular houses
  - Bank accounts to identify unrelated workers paid into one account
  - Mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers
  - Documents for the same next of kin name and/or contact details
  - Documents for the same emergency contact name and/or contact details
  - Documents for workers from the same town/region in their home country.

65	Your business systematically checks workers' landlords' names to determine if the landlord works for the employer or where many of the workers rent from one landlord and acts accordingly on the information.	
66	Your business works in partnership with its clients to cross-reference directly employed worker records with agency worker records as detailed above, and acts accordingly on the information.	
67	Recruiters and consultants are encouraged to regularly talk informally to workers to seek to build trust and gently uncover whether there are any experiencing issues such as harassment, coercion, bullying, control or exploitation.	
68	Your business conducts regular worker welfare checks to identify potential worker exploitation using the Stronger Together Template Worker Questionnaire (see <a href="#">Appendix 5</a> ). This can be distributed through a variety of means, for example email, online, post or face to face. This process is conducted in a controlled environment to prevent any outside influence. Face to face welfare checks are conducted in locations where workers are comfortable.	
69	Areas where workers disembark from transport to work are monitored by CCTV, Security Staff and otherwise to identify any potential suspicious activity.	

### Enable workers to report issues

70	Your business has appointed trusted "Worker Welfare Officers" who speak in workers' first languages to gain the trust of fellow workers to come forward with information on workers experiencing difficulties.	
71	Your business has a published whistleblowing procedure communicated to the whole workforce whereby workers, staff, supervisors and managers can confidentially raise issues of concern to a member of the senior team and issues in the public interest externally without fear of retribution.	
72	Your business has implemented and communicated a variety of channels through which issues can be raised confidentially, such as: <ul style="list-style-type: none"> <li>• In writing or verbally to trained and trusted "Worker Welfare Officers"</li> <li>• Via nominated employee representatives, supervisors, senior managers, HR</li> <li>• Through a sealed on-site "Suggestion Box" checked every day</li> <li>• Through worker voice reporting tools</li> <li>• Through an independent specialist multi-language confidential helpline.</li> </ul>	
73	Your business undertakes random checks across shifts and departments which assures that workers understand hidden exploitation and forced labour risks, how to spot the signs and indicators and how to respond and report these.	

### Contractors' good practice

74	Your business has applied appropriate due diligence to ensure that higher risk contracting companies adopt and operate in accordance with established ethical labour standards good practice (see <a href="#">ETI Base Code</a> ).	
75	Your business requires managers from higher risk contracting companies to attend the <a href="#">Stronger Together Tackling Modern Slavery in Business training workshop</a> .	
76	Your business requires higher risk contracting companies to maintain their own version of this good practice implementation checklist and works collaboratively with them to implement the steps contained within.	
77	Your business requires higher risk contracting companies to list labour providers who they use to supply workers, and that they require their labour providers to apply the recruitment good practice steps above (see steps 42-50).	
78	Your business has confirmed that all contractors have a procedure for providing remedy to identified victims within their workforce and is satisfied that they have been developed in accordance with principles of good remediation practice.	



## RESPONSE AND REMEDY – PROTECT AND PROVIDE REMEDY FOR VICTIMS OF EXPLOITATION

SCORE

### Responding appropriately

- 79 Relevant managers and consultants who may be immediately faced with potential victims of exploitation have been trained to respond with a “People Centred Safeguarding” approach when faced with serious workforce issues. They understand the requirement to risk assess and consider their actions very carefully, and are aware that what they say and do may impact directly on people’s lives including their own, and on potential victims’ and other employees’ safety.
- 80 Relevant managers and consultants are aware that, where potential indicators of forced labour have been identified, they are not to engage with the potential exploiters or otherwise act in a way that could damage evidence, alert offenders or undermine a criminal investigation.
- 81 Relevant managers and consultants are trained on how to act and what to say and do to build trust and rapport with potential victims – to remain calm, listen carefully, be empathic, demonstrate understanding and concern. They understand that their key role is to safeguard the health and welfare of the potential victims and others, rather than to conduct an interview or investigation.
- 82 “Investigation Managers” responsible for investigating serious workforce incidents have received appropriate procedural and investigative interviewing skills training to support them to conduct worker interviews professionally and effectively. They understand how to act and what to say and do to build trust and rapport with potential victims – to remain calm, listen carefully, be empathic and demonstrate understanding and concern etc., and understand that their key role is to safeguard the health and welfare of the potential victims and others rather than to conduct an interview or investigation.
- 83 “Investigating Managers” conduct any workforce investigations using an “Investigation Checklist” (see [Appendix 6](#)) and the sample “Worker Interview Questions” (see [Appendix 7](#)). They understand how to and adopt good practice in recording and protecting evidence. They understand that they should not undertake any formal investigations into suspected modern slavery cases without first escalating internally and seeking advice and guidance from the authorities.
- 84 Your business has established a “Workplace Critical Issues Report” (see [Appendix 8](#)) that it uses to assess investigations into serious workforce issues, including modern slavery and hidden labour exploitation.
- 85 Relevant managers and consultants understand who, how and when to contact the GLAA, Modern Slavery Helpline, Crimestoppers and/or the Police (emergency and non-emergency) in situations where there are potential indicators of forced labour, and how to be best prepared to provide the information required during the call and subsequent communications.

### Remediation

- 86 Relevant managers and consultants are trained to understand and how to explain the options available to potential victims through the National Referral Mechanism, the role of the GLAA and Police, and to involve the Modern Slavery Helpline and Salvation Army as appropriate.
- 87 Relevant managers and consultants are trained how to optimise the potential victim’s control over their own situation by being transparent and allowing them to understand the options available to them, seeking to establish their views and wishes and being careful to balance the individual’s rights, any risks and your business’s responsibility.
- 88 Your business has established a “Remediation Record” (see [Appendix 10](#)) that it uses to document the remediation provided to identified victims of modern slavery.

MONITOR – MONITOR AND REVIEW PROGRESS		SCORE
Enable continuous improvement		
89	Your business maintains a version of this Good Practice Implementation Checklist and uses it to review and guide your progress and continuous improvement.	
90	Your “Tackling Modern Slavery and Hidden Labour Exploitation” Policy contains a process for ongoing continuous improvement and formal review of all procedures and arrangements, on at least an annual basis.	
91	Your business has developed and conducts regular Scenario Modelling/Incident Testing exercises to test how effective your “Response Plan” would be in a simulated real-life situation and implements improvements from these.	
92	Your business has commissioned an independent expert verification assessment of its overall strategic approach to addressing modern slavery risks within its business and supply chains through the Stronger Together Organisational Performance Assessment – <a href="https://stronger2gether.org/opa/">stronger2gether.org/opa/</a> .	
COMMUNICATE – TELL PEOPLE WHAT YOU’VE DONE		SCORE
Enable continuous improvement		
93	Your business has appointed a person with responsibility for communicating its efforts and effectiveness to prevent and address modern slavery and hidden labour exploitation risks. This individual should have in-depth knowledge of these issues, having attended Stronger Together training.	
94	Your business has made a public commitment to addressing the risks of modern slavery in becoming a Stronger Together Business Partner by uploading evidence of steps you’ve taken at <a href="https://stronger2gether.org/business-partners">stronger2gether.org/business-partners</a> .	
95	Your business produces an annual statement as per the requirements of the Modern Slavery Act 2015 Section 54 Transparency in Supply Chains This statement details the steps taken each year to ensure that slavery and human trafficking are not taking place. The statement meets all compliance requirements and good practice Home Office guidance. In doing so, it acts in accordance with the intentions of the Act, encouraging businesses to be transparent about what they are doing and increasing competition to drive up standards.	
96	Your business communicates its efforts to prevent and address modern slavery risks and the effectiveness of these in practice to a range of audiences, including affected stakeholders, shareholders and investors, human rights experts to governments and others who are interested in or concerned about the company’s human rights performance.	
% completion = Score ÷ (96 - number of “Not Applicable” steps) x 2) x 100		

# EMPLOYER GOOD PRACTICE IMPLEMENTATION CHECKLIST

N.B. Download this checklist as an interactive PDF form at [stronger2gether.org/resources/](https://stronger2gether.org/resources/).

Company Name ..... Site .....

Computer Name ..... Email .....

Date: .....

## SCORING SYSTEM

N/A = if not applicable

0 = if not implemented/don't know

1 = partially implemented

2 = fully implemented

## COMMIT TO TACKLE MODERN SLAVERY RISKS IN YOUR BUSINESS

SCORE

### Team appointment and role definition

- 1 A member of the most senior management level within your business has been made explicitly accountable for ensuring that ethical labour standards are applied and for protecting the human rights of those working in the business (direct and agency workers). This includes a specific responsibility for preventing and addressing modern slavery risks.
- 2 A multi-departmental team has been appointed to co-ordinate and oversee the implementation of operational due diligence steps to address the risks of modern slavery and hidden labour exploitation.
- 3 A site "Modern Slavery Lead" has been appointed to lead the implementation of operational due diligence steps to address the risks of modern slavery and hidden labour exploitation.
- 4 Your site has established a "Workforce Incident Management Team" including trained "Investigating Managers" who are able to respond to such issues during all operating hours.
- 5 A remediation team has been appointed to deliver the remediation programme for your business. The team should include representatives from the workforce, managers, trade unions (if active in the workplace), specialists and local NGOs with expertise in modern slavery where available.
- 6 A "Modern Slavery Champion(s)" has been appointed to maintain peer engagement and raise awareness of modern slavery and hidden labour exploitation within the general workforce.
- 7 The individual roles and responsibilities of HR and payroll, Department/Functional Heads, Workforce Incident Management Team members, Investigating Managers, Trade Union/Employee Reps and Welfare Officers to support operational due diligence steps addressing exploitation risks have been defined and communicated to the relevant colleagues.
- 8 The roles and responsibilities of supervisors and team managers in spotting the signs of exploitation and how to handle and report suspected cases have been explicitly defined and communicated to them.

### Establish effective management systems

- 9 Your business has developed and implemented a "Tackling Modern Slavery and Hidden Labour Exploitation" policy, which details the processes it will take to prevent these practices, and the steps it will take where they are identified (see Appendix 1).

10	Your business has developed and implemented a "Responsible Recruitment Policy" (see <a href="#">Responsible Recruitment Toolkit</a> ).	
11	Your business can demonstrate that its anti-bribery and corruption policies are agreed, applied and complied with.	
12	Managers, supervisors and recruiters have been issued with written notification that accepting bribes or inducements to recruit or favour workers or to commit any form of physical or mental worker mistreatment, coercion, bullying or harassment is prohibited and will be investigated as a potential gross misconduct offence (see <a href="#">Appendix 2</a> ).	
13	A "Workforce Incident Reporting Procedure" has been developed for supervisors, workers, consultants and recruiters to report suspected cases of exploitation and unfair treatment. This includes issues such as worker violence, abusive behaviour, bullying, bribery, corruption, discrimination, harassment, victimisation, modern slavery and hidden labour exploitation. Your business can demonstrate that colleagues are aware of and use this process, and that management record and deal with reports appropriately.	
14	There is an established system in place to be able to rapidly conduct background worker HR and payroll records checks. For example, checking next of kin or bank account details for duplicate records or verifying hours paid against hours worked.	
15	Your site has developed a "Response Plan" that details how supervisors and managers will respond immediately on being alerted to potential indicators that an individual or group of workers on site may be subject to exploitation or unfair treatment (see <a href="#">Chapter 15</a> ).	
16	Your site has an established process for using trusted interpreters, a telephone translating line or digital translation devices at immediate notice to have conversations with workers who speak little English.	
17	Your site has formalised how investigations into suspected cases of modern slavery and hidden labour exploitation will be conducted where the affected individual(s) are within the labour provider's or contractor's workforce. This should incorporate the steps within the "Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain" where relevant (see <a href="#">Appendix 9</a> ).	
18	Your site has established relationships with local GLAA Officers and Police, knows which modern slavery charities, care providers and safe homes work in your area, understands the role of the NRM, Modern Slavery Helpline, Salvation Army and Migrant Help with regards to victim protection and support, and understands how to interact with these, should you uncover suspected hidden labour exploitation or forced labour. (See <a href="https://www.humantraffickingfoundation.org/support-services">https://www.humantraffickingfoundation.org/support-services</a> )	
19	Your business has developed and implemented a specific "Remediation Policy" that details the provision of remedy to any identified victims. This policy has been developed in accordance with the principles of good remediation practice (see <a href="#">Chapter 16</a> ).	

#### Training to build capacity and capability (see [Appendix 3](#))

20	The most senior management team in your business has attended an awareness session to ensure that they understand their accountabilities for protecting the human rights of those working in their business, including for preventing and addressing modern slavery and hidden labour exploitation risks.	
21	The site "Modern Slavery Lead" has attended appropriate training to be competent and capable of implementing steps throughout the site to reduce and address the risks of modern slavery and hidden labour exploitation.	
22	The site management team has attended an awareness session to ensure that they understand their responsibilities for implementing effective due diligence to prevent and address modern slavery and hidden labour exploitation risks.	

23	The HR and payroll team, Department/Functional Heads, Workforce Incident Management Team members, Trade Union/Employee Reps and Welfare Officers have received appropriate training to ensure that they understand and can fulfil their roles to reduce and address the risks of modern slavery and hidden labour exploitation.	
24	Supervisors and team managers have received appropriate training so that they are clear how to spot the signs of exploitation and how to immediately handle and properly report suspected cases.	

## ASSESS – UNDERSTAND THE RISKS OF MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION WITHIN YOUR BUSINESS

SCORE

### Map operations

25	Your business has listed all operational sites considered to be part of your organisation and detailed these by type, for example production, co-packing operation, distribution warehouse, administration unit etc.	
26	For your site, you have identified and captured the direct labour recruitment process. This should include: <ul style="list-style-type: none"> <li>• How direct workers are sourced</li> <li>• Whether recruitment agents are used</li> <li>• Whether other workers introduce job applicants.</li> </ul>	
27	For your site, you have listed the names, organisational details and key management contacts of the labour providers supplying agency workers. You have captured the labour sourcing process for each of these labour providers.	
28	For your site, you have listed the names, organisational details and key management contacts of on-site contractors, for example catering, cleaning, security, facilities, waste processing etc. You have captured the labour sourcing process for each of these contractors.	

### Identify risk and prioritise action

29	You have performed a risk assessment for all sites, contractors and labour providers identified in steps 25-28 (see <a href="#">Appendix 4</a> ). You have considered where you have the greatest presence of vulnerable workers (see <a href="#">Chapter 7</a> ) and recruitment models that could be infiltrated by third parties (see <a href="#">Chapter 9</a> ).	
30	Using the risk assessment, you have identified priority areas to implement operational controls and developed an action plan based on the steps in this Good Practice Implementation Checklist.	

## ACT – TAKE ACTION TO PREVENT AND DEAL WITH IDENTIFIED RISKS

SCORE

### Workforce engagement

31	All workers have been issued with a “Stronger Together” multi-language leaflet to raise awareness of how to recognise and report hidden exploitation.	
32	Your site utilises the “Stronger Together” posters, displaying them on notice boards and other places where they may be viewed by all workers.	
33	Induction training for new workers includes a section on how to recognise and report the indicators of forced labour and hidden worker exploitation.	
34	All existing workers have been trained on how to recognise and report the indicators of forced labour and hidden worker exploitation.	



35	Supervisors and support staff, for example security, occupational health, cleaning and catering, are trained to spot the signs that may indicate potential worker exploitation and how to report any concerns to appropriate managers. Indicators include: <ul style="list-style-type: none"> <li>• Workers delivered and collected from work where transport and drivers raise cause for suspicion</li> <li>• Unusual and abnormal behaviour of workers</li> <li>• Workers appear frightened, agitated, secretive</li> <li>• Workers appear to be instructed by another</li> <li>• An individual speaks on behalf of others regularly</li> <li>• Workers show signs of injury and/or malnourishment</li> <li>• Workers have few personal effects, little money or food</li> <li>• A group of workers who may live, work and travel together stop coming to work for no particular reason.</li> </ul>	
36	Regular briefings and a variety of engagement activities are conducted with your workforce to ensure that the risks and responses to hidden labour exploitation and modern slavery are kept current and live.	
37	The site "Modern Slavery Lead" engages with supervisors and team leaders to ensure that they are confident in identifying, deterring and reporting forced labour and hidden labour exploitation, and that they are trained and instructed to whistleblow where they have a concern over another manager, supervisor or labour provider consultant, and to facilitate two way collaborative discussions about how arrangements and activities to address exploitation risks may be improved. (See <a href="#">Stronger Together Resources</a> and <a href="#">Just Good Work</a> )	
38	Modern slavery and hidden labour exploitation are agenda items during regular progress/health and safety meetings with trade union and/or employee representatives to collaboratively review and improve your informal and formal approaches to identifying, deterring and reporting these issues.	
39	Where formal worker representation arrangements exist, your business engages with worker representatives (and where these do not formally exist, speaks with groups of workers) to work collaboratively to determine if there may be any issues of exploitation and to discuss whether there are any ways that the site can improve its processes or better engage with workers in its activities to address these risks.	
40	Your site engages with local NGOs, migrant worker support groups or other worker welfare organisations to speak to workers in their native language in a supportive manner to identify if there are any issues.	
<b>Direct recruitment good practice</b>		
41	Your recruitment process establishes all of the following: <ul style="list-style-type: none"> <li>• Right to work and the statutory excuse</li> <li>• The person presenting is the person in the identity documents</li> <li>• Applicants have control over their own identity documents</li> <li>• How the applicant found out about the job</li> <li>• Applicants have not paid anyone, or will not have to pay anyone, to obtain the job</li> <li>• Applicants have not paid anyone, or will not have to pay anyone, to get to the UK (if newly arrived)</li> <li>• The person arriving for work is the person recruited.</li> </ul>	
42	Your recruitment process establishes the mobile phone number of the job applicant, that they have their mobile phone at interview, tests the number provided and checks that this is their genuine mobile phone and not a burner phone provided for the interview.	
43	Your recruitment/induction process establishes that next of kin details provided are genuine and can be contacted.	

44	Your recruitment/induction process records a landlord's name and verifies the worker's address by asking to see a rent book or contract. Recruiters are trained and instructed to report where a worker rents from a landlord who works for the employer or labour provider.
45	All staff involved in the recruitment process have been trained to recognise and report indicators of exploitation throughout recruitment and induction. All recruiters conduct the required checks and report concerns, even in peak periods, including where: <ul style="list-style-type: none"> <li>• Applicants are introduced by a 'representative', often of the same nationality</li> <li>• An individual speaks on behalf of others, controls the conversation and waits while individuals are being interviewed</li> <li>• Application documents are brought in by one individual on behalf of friends and family</li> <li>• Application documents are in a better standard of English than the job applicant possesses</li> <li>• Multiple application documents have been completed in the same handwriting.</li> </ul>
46	Processes are in place to prevent individuals, however seemingly well intentioned, to introduce significant numbers of workers for work (accepting that occasional word of mouth "Refer a Friend" introductions to close friends and family are likely to be harmless).
47	Literacy, numeracy or other testing is conducted in a controlled environment to prevent manipulation with a format that is regularly changed to prevent coaching of individuals.
48	An effective system is in place to ensure that no fee or cost for recruitment will be charged to directly recruited workers (see Responsible Recruitment Toolkit <a href="#">Guide to Eliminating Worker Paid Recruitment Fees and Related Costs</a> ).

### Proactive checks

49	Your site systematically checks all of the following for "Alert Flags" and acts accordingly on the information: <ul style="list-style-type: none"> <li>• Addresses of its workers and job applicants for high occupancy of particular houses</li> <li>• Bank accounts to identify unrelated workers paid into one account</li> <li>• Mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers</li> <li>• Documents for the same next of kin name and/or contact details</li> <li>• Documents for the same emergency contact name and/or contact details</li> <li>• Documents for workers from the same town/region in their home country.</li> </ul>
50	Your site systematically checks workers' landlords' names to determine if the landlord works for the employer or where many of the workers rent from one landlord and acts accordingly on the information.
51	Your site works in partnership with its labour providers to cross-reference directly employed worker records with agency worker records as detailed above, and acts accordingly on the information.
52	Your site conducts formal re-checking of bank accounts, addresses and personal details etc. when agency workers transfer to work directly for your business.
53	Supervisors and managers are encouraged to regularly talk informally to workers to seek to build trust and gently uncover whether there are any experiencing issues such as harassment, coercion, bullying, control or exploitation.
54	Your site conducts regular worker welfare checks to identify potential worker exploitation using the Stronger Together Template Worker Questionnaire (see <a href="#">Appendix 5</a> ). This can be distributed through a variety of means, for example email, online, post or face to face. This process is conducted in a controlled environment to prevent any outside influence. Face to face welfare checks are conducted in locations where workers are comfortable.

55	Areas where workers disembark from transport to work are monitored by CCTV, Security Staff and otherwise to identify any potential suspicious activity.	
<b>Enable workers to report issues</b>		
56	Your site has appointed trusted "Worker Welfare Officers" who speak in workers' first languages to gain the trust of fellow workers to come forward with information on workers experiencing difficulties.	
57	Your site has a published whistleblowing procedure communicated to the whole workforce whereby workers, staff, supervisors and managers can confidentially raise issues of concern to a member of the senior team and issues in the public interest externally without fear of retribution.	
58	<p>Your site has implemented and communicated a variety of channels through which issues can be raised confidentially, such as:</p> <ul style="list-style-type: none"> <li>• In writing or verbally to trained and trusted "Worker Welfare Officers"</li> <li>• Via nominated employee representatives, supervisors, senior managers, HR</li> <li>• Through a sealed on-site "Suggestion Box" checked every day</li> <li>• Through worker voice reporting tools</li> <li>• Through an independent specialist multi-language confidential helpline.</li> </ul>	
59	Your site undertakes random checks across shifts and departments which assures that workers understand hidden exploitation and forced labour risks, how to spot the signs and indicators and how to respond and report these.	
<b>Agency labour supply good practice</b>		
60	Appropriate due diligence is applied in the appointment of labour providers to establish their credibility and legitimacy, including audit and certification where appropriate (see " <a href="#">7 Steps to Embed Labour Provider Due Diligence and Responsible Recruitment</a> " and " <a href="#">Good Practice Checklist for using UK Labour Providers</a> ").	
61	<p>Labour provider(s) are paid a sufficient charge rate to cover:</p> <ul style="list-style-type: none"> <li>• Statutory wage factors</li> <li>• Overhead costs</li> <li>• Account servicing costs.</li> </ul> <p>This should include a sustainable net margin that allows the labour provider to meet their obligations with regards to achieving ethical labour standards (see <a href="#">ETI Base Code</a>) and activity to reduce modern slavery and hidden labour exploitation risks.</p>	
62	<p>A written procedure is in place with the labour provider(s) to ensure that the allocation of work to the pool of agency workers is done in a fair and objective way and that agency workers understand this process. This should include:</p> <ul style="list-style-type: none"> <li>• Nominated and trained site managers only have the authority to book agency workers from the labour provider</li> <li>• The labour user will specify the number of skills/roles required, not named individuals</li> <li>• Situations where workers congregate in the hope of work and employer supervisors select from the group are avoided.</li> </ul>	
63	<p>It has been agreed with the labour provider(s) the documentation that will apply to agency workers, including:</p> <ul style="list-style-type: none"> <li>• Contractual Terms of Business</li> <li>• Service-Level Agreement</li> <li>• Key Information Document</li> <li>• Worker Assignment Details</li> <li>• Worker Handbook.</li> </ul>	

64	Induction training for agency workers is paid and includes a section on how to recognise and report the indicators of modern slavery and hidden worker exploitation.	
65	Your site is clear about the labour sourcing supply chain used by your labour provider(s) and has agreed the labour sourcing methods, channels and agents used. The labour provider(s) has an effective system in place to ensure that no fee or cost for recruitment will be charged to workers (see Responsible Recruitment Toolkit " <a href="#">Guide to Eliminating Worker Paid Recruitment Fees and Related Costs</a> ").	
66	Your site has agreed with the labour provider a fair, transparent, non discriminatory and merit-based vacancy notification and selection process to enable agency workers to apply for and obtain permanent directly employed roles within your business.	
67	Your business requires the labour provider's relevant staff to attend the <a href="#">Stronger Together Tackling Modern Slavery in Business training workshop</a> .	
68	Your site holds regular progress meetings with its labour providers where you jointly review the completion of the Labour Provider Good Practice Implementation Checklist, and uses this as a basis for collaborative informal and formal approaches to identifying and addressing risks of modern slavery and hidden labour exploitation.	
69	Your site has informed the labour provider of the senior manager to whom they should report and deal confidentially with on matters of potential harassment, discriminatory, unreasonable or suspicious actions by the employer's supervisors etc. and where there are indicators of hidden labour exploitation or modern slavery.	
70	Your site has confirmed that all labour providers have a procedure for providing remedy to identified victims within their workforce and is satisfied that they have been developed in accordance with principles of good remediation practice (see <a href="#">Chapter 16</a> ).	

#### On-site contractors' good practice

71	Appropriate due diligence has been applied to ensure that higher risk on-site contracting companies adopt and operate in accordance with established ethical labour standards good practice (see <a href="#">ETI Base Code</a> ).	
72	Your business requires managers from higher risk on-site contracting companies to attend the <a href="#">Stronger Together Tackling Modern Slavery in Business training workshop</a> .	
73	Your site requires higher risk on-site contracting companies to maintain their own version of this good practice implementation checklist and works collaboratively with them to implement the steps contained within.	
74	Your site requires higher risk on-site contracting companies to list labour providers who they use to supply workers into their own business onto your site, and that they require their labour providers to apply the Agency Labour Supply Good Practice steps above (see steps 60-70).	
75	Your site has confirmed that all on-site contractors have a procedure for providing remedy to identified victims within their workforce and is satisfied that they have been developed in accordance with principles of good remediation practice.	

### REMEDY – PROTECT AND PROVIDE REMEDY FOR VICTIMS OF EXPLOITATION

### SCORE

#### Responding appropriately

76	Supervisors and team managers who may be immediately faced with potential victims of exploitation have been trained to respond with a "People Centred Safeguarding" approach when faced with serious workforce issues. They understand the requirement to risk assess and consider their actions very carefully and are aware that what they say and do may impact directly on people's lives including their own, and on potential victims' and other employees' safety.	
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77	Relevant supervisors and managers are aware that, where potential indicators of forced labour have been identified, they are not to engage with the potential exploiters or otherwise act in a way that could damage evidence, alert offenders or undermine a criminal investigation.
78	"Investigating Managers" responsible for investigating serious workforce incidents have received appropriate procedural and investigative interviewing skills training to support them to conduct worker interviews professionally and effectively. They understand how to act and what to say and do to build trust and rapport with potential victims – to remain calm, listen carefully, be empathic and demonstrate understanding and concern etc., and understand that their key role is to safeguard the health and welfare of the potential victims and others rather than to conduct an interview or investigation.
79	"Investigating Managers" conduct any workforce investigations using an "Investigation Checklist" (see <a href="#">Appendix 6</a> ) and the sample "Worker Interview Questions" (see <a href="#">Appendix 7</a> ). They understand how to and adopt good practice in recording and protecting evidence. They understand that they should not undertake any formal investigations into suspected modern slavery cases without first escalating internally and seeking advice and guidance from the authorities.
80	Your site has established a "Workplace Critical Issues Report" (see <a href="#">Appendix 8</a> ) that it uses to assess investigations into serious workforce issues, including modern slavery and hidden labour exploitation.
81	Relevant supervisors and managers understand who, how and when to contact the GLAA, Modern Slavery Helpline, Crimestoppers and/or the Police (emergency and non-emergency) in situations where there are potential indicators of forced labour, and how to be best prepared to provide the information required during the call and subsequent communications.

## Remediation

82	Relevant supervisors and managers are trained to understand and how to explain the options available to potential victims through the National Referral Mechanism, the role of the GLAA and Police, and to involve the Modern Slavery Helpline and Salvation Army as appropriate.
83	Relevant supervisors and managers are trained how to optimise the potential victim's control over their own situation by being transparent and allowing them to understand the options available to them, seeking to establish their views and wishes and being careful to balance the individual's rights, any risks and your business's responsibility.
84	Your site has established a "Remediation Record" (see <a href="#">Appendix 10</a> ) that is used to document the remediation provided to identified victims of modern slavery.

## MONITOR – MONITOR AND REVIEW PROGRESS

## SCORE

### Enable continuous improvement

85	Your site maintains a version of this Good Practice Implementation Checklist and uses it to review and guide your progress and continuous improvement.
86	Your "Tackling Modern Slavery and Hidden Labour Exploitation" Policy contains a process for ongoing continuous improvement and formal review of all procedures and arrangements, on at least an annual basis.
87	Your business assesses its overall strategic progress using the Stronger Together Progress Reporting Tool ( <a href="https://stronger2gether.org/prt/">stronger2gether.org/prt/</a> – a free online tool for suppliers to guide, self-assess and report progress made in their overall strategic approach to addressing modern slavery risks within their business and supply chains using a best practice UN Guiding Principles-aligned framework).



## Verify implementation

- |    |   |  |
|----|---|--|
| 88 | Your site has developed and conducts regular Scenario Modelling/Incident Testing exercises to test how effective your "Response Plan" would be in a simulated real life situation and implements improvements from these.   |  |
| 89 | Your business has commissioned an independent expert verification assessment of its overall strategic approach to addressing modern slavery risks within its business and supply chains through the Stronger Together Organisational Performance Assessment – <a href="https://stronger2gether.org/opa/">stronger2gether.org/opa/</a> . |  |

## COMMUNICATE – TELL PEOPLE WHAT YOU'VE DONE

## SCORE

- |    |   |  |
|----|---|--|
| 90 | Your business has appointed a person with responsibility for communicating its efforts and effectiveness to prevent and address modern slavery and hidden labour exploitation risks. This individual should have in-depth knowledge of these issues, having attended Stronger Together training.  |  |
| 91 | Your site has made a public commitment to addressing the risks of modern slavery in becoming a Stronger Together Business Partner by uploading evidence of steps you've taken at <a href="https://stronger2gether.org/business-partners">stronger2gether.org/business-partners</a> .  |  |
| 92 | Your business produces an annual statement as per the requirements of the Modern Slavery Act 2015 Section 54 Transparency in Supply Chains. This statement details the steps taken each year to ensure that slavery and human trafficking are not taking place. The statement meets all compliance requirements and good practice Home Office guidance. In doing so, it acts in accordance with the intentions of the Act, encouraging businesses to be transparent about what they are doing and increasing competition to drive up standards. |  |
| 93 | Your business communicates its efforts to prevent and address modern slavery risks and the effectiveness of these in practice to a range of audiences, including affected stakeholders, shareholders and investors, human rights experts to governments and others who are interested in or concerned about the company's human rights performance.   |  |

**% completion = Score ÷ (93 - number of "Not Applicable" steps) x 2) x 100**

# RESPONDING APPROPRIATELY TO POTENTIAL INDICATORS OF FORCED LABOUR

All businesses should develop a “Response Plan” that lays out the actions that managers and supervisors should take when potential indicators of forced labour are suspected or discovered. Having a Response Plan in place improves the likelihood of your business acting in accordance with good practice appropriate to the country/region in which you operate.

Your Response Plan can be a standalone procedure that is specific to modern slavery, or an expansion of an existing “Serious Workforce Incident Procedure” for dealing with other incidents such as worker violence, bullying, bribery, corruption or discrimination. Where business continuity or crisis management plans already exist, consider extending these to include forced labour and hidden exploitation cases.

Depending on the size and diversity of your business, you may choose to develop individual procedures for each of your operational sites



## **The Response Plan must prioritise the safeguarding and welfare of any potential victims.**

Adopting a ‘People-Centred Safeguarding Approach’ means to:

- Take account of the particular circumstances that you are faced with, and to adapt your processes and tailor your response to place the needs of the individual at the forefront of any action taken
- Place the safety, welfare and confidentiality of any at-risk persons as the primary and paramount factor, recognising that victims may be in an extremely vulnerable situation and in a highly traumatised state
- Recognise the limitations of your responsibility, your duty to inform the appropriate authorities at your earliest opportunity and to follow their guidance and instruction
- Act non-discriminatorily, whatever the status of the individuals.

# PREPARING TO RESPOND CORRECTLY

Preparation is key to ensure that you respond appropriately, should potential indicators of forced labour be identified within your business. The key stages of preparation are detailed below:

## TEAM APPOINTMENT AND TRAINING

- A “Workforce Incident Management Team” has been established. As a minimum, this should consist of the following roles:
  - Operational Site Lead – leads the implementation of the Response Plan and escalates to Investigation and Enforcement Authorities and senior-level management where required.
  - Welfare Officer – remains with any potential victims that have been identified and provides emotional support where required.
  - First Aider – provides immediate first aid, assesses any injuries and advises if further medical assistance is required.
  - Investigation Manager – conducts initial **fact-finding activity** and records gathered evidence, including background worker record checks and, if required, worker welfare conversations. **The term ‘Investigation’ in this instance only refers to the initial gathering of information.** As soon as indicators of forced labour have been identified, all internal ‘investigation’ activity conducted by the Investigation Manager must be halted and immediate referral made to the authorities.
  - Scribe – supports the investigation manager to record and track information and evidence.
- Competent and trusted managers have been assigned to the Workforce Incident Management Team and have received the training required to fulfil their roles (see [Appendix 3](#) for detail of Stronger Together training courses):
  - All members of the Workforce Incident Management Team have attended modern slavery awareness training and understand the Response Plan.
  - Investigation Managers have been trained in investigative interviewing skills and good practice techniques for handling cases of forced labour.
  - First Aider training is up to date and certifications are valid.
- All managers, supervisors and support staff understand that their key role, where potential indicators of forced labour are identified, is to safeguard the safety, health and welfare of the potential victim and others, **not to conduct an interview or formal investigation.**
- All managers, supervisors, support staff and workers are aware not to engage with suspected exploiters. In all situations, it should be borne in mind that job applicants, workers and their families may be in real and serious danger from violent exploitative individuals or organised criminal gangs. The protection of these at-risk individuals is paramount and must take precedence over all other considerations.
- Investigation Managers who may engage with potential victims understand to risk assess and consider their actions very carefully and be aware that what they say and do may impact directly on people’s lives, including their own, and on potential victims’ and other employees’ safety.
- Investigation Managers are trained how to act and what to say and do to build trust and rapport with potential victims – to remain calm, listen carefully, be empathic and demonstrate understanding and concern etc. Potential victims often do not disclose in the early stages of an inquiry, but this rapport-building will support the ongoing process.
- Investigation Managers understand their role in optimising the potential victim’s control over their own situation by being transparent and allowing them to understand the options and process, seeking to establish their views and wishes and being careful to balance the individual’s rights, any risks and your responsibility.

- The Workforce Incident Management Team is aware that, where potential indicators of forced labour have been identified, they must stop internal investigations and escalate to an external authority. They understand that to continue the internal investigation could increase the risk to the workers, damage evidence, alert offenders and undermine a criminal investigation.
- The Workforce Incident Management Team understands the role of national bodies with regards to enforcement, victim protection and support, and appropriate relationships are established with local GLAA Officers and Police, modern slavery charities, care providers and safe homes in your area (see <https://www.humantraffickingfoundation.org/support-services> for a map of support services for survivors of trafficking in the UK).

## OPERATIONAL INVESTIGATION AND INTELLIGENCE PROCEDURES

- All managers, supervisors, support staff and workers are instructed and understand how to report concerns or suspicions of forced labour or hidden labour exploitation to the Workforce Incident Management Team. This includes reporting indicators of exploitation, unusual worker behaviour or incidents in the workplace.
- Your business has an established system to rapidly review personnel files and HR systems to undertake background checks on worker records when faced with serious workforce issues or potential indicators of forced labour.
- A Response Plan has been developed and implemented to ensure that potentially serious workforce issues are properly managed.
- The Response Plan details the practical arrangements to be applied to ensure that potential victims are protected. These practical arrangements should cover nights/weekends if applicable. They include the following:
  - Trusted, independent interpretation arrangements are in place and can be used at immediate notice, for example a telephone interpreting service or electronic translating device. Do not use other workers who speak the same language unless they are in a trusted role, e.g. HR/Welfare.
  - First aid facilities and support are available.
  - Suitable rooms for interviews have been identified that are out of view of others. It is useful to ask yourself the question, "who is able to observe me doing this, what may they infer from my actions and what might the impact be?". Where there is more than one potential victim, it may not be possible to know who is being exploited and who is an exploiter. Identify suitable rooms to keep multiple individuals separate.
  - Ensuring that two colleagues are available to remain in the company of each individual who has come forward. Depending on the situation, managers should remain with the potential victim(s) with a colleague in a safe place until the potential victim can be "handed over" to a GLAA Officer, Police or other support organisation. If this is not possible, make sure that the individual is provided with advice and given guidance about the NRM, contacting the Modern Slavery Helpline, the GLAA and reporting to the Police.
  - Camouflage stories have been established to use in different situations where worker interviews are required, to reduce the chance of exploiters becoming suspicious or alerted.
  - Always call the Police on 999 in an emergency. Seek guidance from the GLAA and/or the Police at the earliest opportunity and they will direct you accordingly as to how to proceed. Seek advice from the Modern Slavery Helpline.
  - Where the exploitation of one job applicant or worker is discovered, due consideration must be given to the risk of other job applicants or workers also being in an exploitative situation.
- The Response Plan provides supplementary documents that a Workforce Incident Management Team can use to support investigations and record their actions and evidence. These include:

- 'Workplace Incident Investigation Checklist' – supporting checklist to guide and verify completion of best practice investigation actions ([Appendix 6](#)).
- 'Sample Worker Interview Questions' – collection of sample questions to support face-to-face conversations with workers ([Appendix 7](#)).
- 'Workplace Critical Issues Report' – summary record for suspected trafficking, forced labour or third-party work-related exploitation ([Appendix 8](#)).
- The Response Plan is aligned to good practice guidance on gathering and protecting evidence (see below).
- The Response Plan details how and when managers, supervisors and workers can and should contact the GLAA, Police (emergency and non-emergency) and Modern Slavery Helpline where there are potential indicators of forced labour. This includes who to contact in which situation and how to be prepared to provide the information required to the investigative agency.
- Expectations and requirements of any labour providers and contractors have been confirmed, to align with your approach for responding to potential cases and to clarify how intelligence will be shared between your organisations.
- Regular scenario modelling exercises are undertaken to test the implementation and efficacy of your Response Plan. Conducting regular exercises will verify if your business is appropriately prepared and if the Workforce Incident Management Team responds in the right way.

## NOTIFICATION OR DISCOVERY OF A POTENTIAL VICTIM

Potential indicators of forced labour may be uncovered through activities such as an investigation into another workplace matter, due diligence checks on worker records or social audits.

A worker may directly observe indicators of exploitation or may report unusual or suspicious behaviour that they have witnessed amongst their peers. You may be contacted by external authorities regarding an ongoing investigation that involves members of your workforce. Alternatively, it may come to light directly through whistleblowing or a victim reporting their own exploitation.

It may not be immediately clear if these are indicators of modern slavery offences or another type of labour exploitation. Best practice is to approach each case as per the below guidance and seek support externally if further clarification is needed.

You may receive information that a worker(s) is a victim of these offences or could be involved in the exploitation of another individual. Regardless of the circumstances, the key principles for managing a suspected case remain the same.





# SITE WORKFORCE INCIDENT FLOWCHART

## Discovery of, or notification of a potential victim

Ensure the safety and welfare of any potential victim(s) and your workforce

- Consider the welfare of workers in your business, and whether there is a risk of others also being in an exploitative situation
- Where a worker has presented themselves to you, if safe to do so, move them to a place of safety, away from public areas, in order to provide immediate discretion and protection
  - Do not draw attention to the fact that they have sought assistance
- Assess if first aid support or additional medical attention is required

**Where a worker is considered to be in immediate danger, contact the Police on 999 immediately.**

## Notify the Workforce Incident Management Team

- Report any suspicions or identification of victims of modern slavery to the Site Operations Lead
- Step up required members of the Workforce Incident Management Team to conduct initial fact-finding activity and determine if the incident requires escalation to Investigating and Enforcement Authorities
- Consider cultural, gender and other factors to determine who will support fact-finding activity, especially where worker interviews or the provision of immediate welfare support is required

## Establish the circumstances and facts

As per the good practice guidance, the Workforce Incident Management Team should:

- Record any observations of unusual behaviour or physical indicators that have been reported
- Conduct background checks on worker records. Red flags include shared addresses, phone numbers, emergency contact details and bank accounts
- Record the details of any worker interviews. These should only be conducted where a victim has presented themselves to you, or where advised to by the GLAA or Police
- Review all the information and evidence gathered, and consider if there are indicators of forced labour or any other criminal activity

**Do not conduct a full investigation. Do not engage with suspected exploiters**

## Escalate to the Investigation and Enforcement Authorities

- Where a worker has presented themselves to you, inform them that you will report their concerns to the authorities. Explain that your business has a duty of care to protect their welfare
- In an emergency, call the Police on 999
- To report a suspected modern slavery or labour exploitation case, call the Gangmasters and Labour Abuse Authority (GLAA) on 0845 432 0804
- To report other criminal activity or a suspected modern slavery case when the GLAA is unavailable, call the Police on 101
- For additional guidance or advice, call the Modern Slavery Helpline on 08000 121 700

## Inform stakeholders

### Internal

- Inform senior management and those responsible for media relations of any suspected or confirmed modern slavery cases
- Share any updates and feedback from the external authorities

### External

To protect the safety of individuals and to not prejudice inquiries and potential prosecutions, businesses should maintain confidentiality over all information relating to an incident until authorised to do so by the appropriate UK authority such as the Police or GLAA.

- Identify which external stakeholders should be notified
- Engage those stakeholders in line with good practice guidance and where relevant, the “Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain” (see [Appendix 9](#)).

## Provide remedy

- Inform your Remediation Team
- Provide remediation for identified victims as outlined in your business Remediation Policy
- Consider the likelihood that there are other workers impacted who have not yet been identified. Provide an opportunity for any other victims to raise concerns by adapting and circulating the Stronger Together Template Worker Questionnaire ([Appendix 5](#))
- If the potential victim(s) remains in employment with your business, conduct regular welfare checks to review their progress and identify any further support needs
- Where there has not been enough evidence for the GLAA or Police to pursue the case further, continue to observe any potential victims and notify the authorities of any changes or additional indicators that come to light

## Conduct post-incident review

- Conduct a root cause analysis to identify learnings and improvement opportunities to your Response Plan and Remediation Policy

# GOOD PRACTICE IN GATHERING AND PROTECTING EVIDENCE

The GLAA advises that investigations into serious cases of exploitation have fallen by the wayside because of the way initial internal enquiries have been undertaken. Through ignorance or misplaced good intentions, this has resulted in culprits being tipped off, evidence being polluted and becoming unreliable and situations where the Crown Prosecution Service has decided that it is not in the public interest to consider prosecution.

Implementing good practice in gathering and protecting evidence is particularly important where a case may be considered for legal proceedings. To meet the requirements of legislation in relation to both criminal and civil proceedings, a law enforcement agency needs to demonstrate that all factors have been taken into account. They are also bound by legislation to report any facts or information that could assist the defence of any person accused of committing an offence.

Early engagement with the GLAA and/or Police in cases where you have an initial suspicion will allow them to guide and support you regarding what records should be made. Any material obtained at this early stage is likely to be of significant value further down the process.

In all situations, it should be borne in mind that job applicants, workers and their families may be in real and serious danger from violent exploitative individuals or organised criminal gangs. The protection of these at-risk individuals is paramount and must take precedence over all other considerations.

All managers who undertake workplace investigations should:

- Have a knowledge of the general indicators of forced labour
- Understand that incorrectly deciding to continue with an internal inquiry can undermine the ability to secure an effective criminal investigation and prosecution outcome
- Utilise available template investigation documents and apply good practice when recording and protecting evidence (see below)
- Establish appropriate confidentiality to ensure that the exploiters are not alerted that their activities have been identified
- Ensure that appropriate measures are implemented to protect the identity of any job applicants or workers who may be victims of exploitation
- Know to halt the internal inquiry and the procedure to follow when they identify potential indicators of forced labour and the importance of immediate referral to the authorities as soon as they suspect that someone is a victim of exploitation
- Understand that they may become a witness in any criminal investigation.

It is good practice with regards to taking and storing notes and evidence to:

- Open an enquiry file – keep a file with all documents and records of conversations relevant to the inquiry
- Keep a record of the circumstances leading up to any conversation with someone considered to be a potential victim
- Record any initial first complaints from victims – record where and when the complaint was made, including the demeanour of the victim. This can be useful evidence as there may be little to corroborate a victim's account.
- Record details of persons present during any disclosure. Record what was said by the potential victim and witnesses, and your responses. Note the actions you took and when. Keep notes brief, accurate and to the point. Notes should be timed, dated and signed as an accurate record by the person making them and other managers present.
- Obtain contact details of any potential witnesses, if possible

- Retain copies of any passports or other identity documents offered. Any documents given by a potential victim or others should be retained, and the reasons why you have been given them recorded.
- Safely store any notes, personnel or work records in respect of a potential victim and make them available to law enforcement agencies when any investigation is taken forward by them. If you suspect that an item might be useful, it is better to preserve it at the time than to try to recover it at a later date.
- Retain original documentation and any notes in the original format for a period of six years
- Relevant documents and any other potential exhibits should be put into bags or envelopes. Handle items with gloves where possible to avoid any fingerprint/DNA contamination. If possible, lock them away securely where they cannot be interfered with. Record where you store them and who they are passed to.
- Collect and preserve CCTV evidence if in place. Ensure that any CCTV systems are working and that there is sufficient hard disk memory space to capture the data and an ability to digitally copy and store evidence.
- If a worker has injuries, capture them on a mobile phone/camera before they are lost and upload this to your digital records
- Record vehicle registration numbers and descriptions of suspected exploiters as the opportunity arises, but only if safe to do so. Being observed by exploiters using a camera phone in such circumstances raises the risk to you and the potential victims significantly, and will alert the exploiter.
- Record your reasons for believing that a person is a potential victim, identifying what you consider to be potential indicators of forced labour on a "Workplace Critical Issues Report" (see [Appendix 8](#)).

It is good practice with regards to conducting worker interviews to:

- Establish a camouflage story to reduce the chance of exploiters becoming suspicious or alerted. Have a variety of cover stories in mind to use.
- Review the sample Stronger Together Worker Interview Questions (see [Appendix 7](#)) as a framework to guide your conversations. It is important that questions to be asked should be gauged to the particular circumstances and that you should react and respond to answers to inform your next question. The interviewer will elicit more information by holding a conversation rather than by sticking rigidly to a list of questions. The focus of the interview should be determined by a stated objective and reference to several "topics" that you wish to cover, with the resulting questions directed by what emerges during the conversation.



# REPORTING EXPLOITATION TO INVESTIGATING AND ENFORCEMENT AUTHORITIES

Where potential indicators of modern slavery are uncovered, it is essential to take the correct and appropriate action, as ignoring or mishandling such situations allows exploitation to flourish or to be hidden to prevent future identification, increasing the control of, and threats to, workers.

In the UK it is a criminal offence punishable by up to life imprisonment to hold another person in slavery or servitude or to require another person to perform forced or compulsory labour. Investigations where there are indicators of such offences should be conducted by officers of the Police or GLAA who have the requisite skills and powers/authority.

As soon as an initial assessment of the facts causes concern regarding the potential presence of forced labour/human trafficking/modern slavery, you should cease any investigation without raising suspicion and notify the investigating and enforcement authorities, i.e. the Gangmasters and Labour Abuse Authority (GLAA) and/or the Police in accordance with the guidance laid out below. To continue thereafter without informing the authorities is to run the risk that any future criminal investigation will be undermined, the offenders may be tipped off and the evidence trampled over.

It is preferable to report concerns that do not meet the threshold for a person to be considered a victim of modern slavery than to miss an opportunity to do so.

You should be prepared with the relevant information to hand and be clear about the circumstances and why you consider that it may be a case of forced labour, modern slavery or human trafficking. This will enable the enforcement agencies to assess what steps to take next and the advice to give you.

- **Contact the Gangmasters and Labour Abuse Authority (GLAA) on 0845 432 0804 or email [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)**

Any business or individual may contact the GLAA Monday to Friday during office hours (or leave a message outside of these times) to report concerns of labour exploitation. The GLAA will offer advice in relation to next steps. The GLAA will seek to arrange to meet any potential victim of forced labour at the earliest opportunity, subject to an assessment of the safety of the victim.

The GLAA encourages early engagement by labour providers and employers and commits to work alongside these businesses.

- **Call the Police on 999** – Always call 999 when it is an emergency, such as when a crime is in progress, someone suspected of a crime is nearby, when there is danger to life or when violence is being used or threatened
- **Call the Police on 101** – To talk to your local police officer, get crime prevention advice or report a crime that does not need an emergency. They are available 24 hours a day, 7 days a week
- If you receive information about a threat to life of a person at risk outside of the UK, **call the National Crime Agency (NCA) Control Centre on 0870 000 600.**

You can also contact the Modern Slavery Helpline on 08000 121 700 (24 hours a day, 7 days a week) or <https://www.modernslaveryhelpline.org/report> to report a suspicion or to get advice.





## ENGAGING WITH OTHERS FOLLOWING ESCALATION OR EXPOSURE

To protect the safety of individuals and to not prejudice inquiries and potential prosecutions, businesses should maintain confidentiality over all information relating to an incident until authorised to do so by the appropriate UK authority such as the Police or GLAA. Businesses should actively seek approval from the relevant authority to communicate information and:

- Have a protocol in place for the Incident Management Team to engage internally with the wider business, onsite management and workforce to appropriately communicate what happened, why it happened and what needs to happen to reduce the chances of it occurring again
- Establish a process for engaging with customers which incorporates the good practice within the “Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain” (see [Appendix 9](#))
- Have in place nominated individuals and processes for appropriate engagement with the media, taking account of all relevant circumstances.

## REMEDICATION

Where a victim of forced labour or trafficking has been identified, your business should determine what remedial activity is appropriate in accordance with the guidance in [Chapter 16](#) of this toolkit.

Remedy will vary on a case-by-case basis and should be adapted to meet the needs and wishes of each individual.

## MONITORING AND REVIEW

Relevant managers should undertake a root cause analysis process after each incident to identify learnings and improvement opportunities for your Response Plan arrangements.

The post incident review should include an overview of the incident and timeline, reflections on what did and did not go well, identified risks and opportunities, key lessons learned and an action plan to address improvement areas.

All policies and procedures should be formally reviewed on an annual basis as a minimum.

# ENABLING REMEDY

## FOLLOWING CASES OF FORCED LABOUR

The processes that businesses will need to develop to enable remedy for victims of forced labour will vary by country and region depending upon the existence and effectiveness of state-based systems for the remedy of business-related human rights abuse.

“ At its core, the concept of remedy aims to restore individuals or groups that have been harmed by a business’s activities to the situation they would have been in, had the impact not occurred. Where this is not possible, it can involve compensation or other forms of remedy that try to make amends for the harm caused.”<sup>19</sup> ”

The guidance below supports responsible businesses to develop their own remediation processes which will apply if victims of forced labour have been identified within their own organisations in the UK.

### ESTABLISHING YOUR REMEDIATION PROGRAMME

Businesses first need to establish the mechanism through which they will define and operate their remediation policy and procedures.

Your remediation programme should allow for violations to be investigated effectively, promptly, thoroughly and impartially, and that remediation is applied in a fair and impartial manner, irrespective of who may ultimately be the bearer of responsibility for the violation.

SIXTEEN



<sup>19</sup>. <https://www.businessrespecthumanrights.org/en/page/349/remediation-and-grievance-mechanisms>

## TEAM APPOINTMENT

- Appoint a remediation team who is responsible for delivering the remediation programme for your business. The team should include representatives from the workforce, managers, trade unions (if active in the workplace), specialists and local NGOs with expertise in modern slavery where available
- Define the scope of responsibility of your remediation team – this may include for each of your sites:
  - Reviewing the effectiveness of actions implemented to prevent the risk of forced labour
  - Reviewing the understanding of all the workforce and accessibility to all workers to report suspicions and actual cases of forced labour
  - Reviewing the state of preparation to respond appropriately to suspected and actual cases of forced labour
  - Developing your business's remediation policy and procedures
  - Managing the process of remedy in reported cases of forced labour.
- Establish that your remediation team will adopt a victim-oriented perspective. Victims should be treated with humanity and respect for their dignity and human rights, and appropriate measures should be taken to ensure their safety, physical and psychological well-being and privacy, as well as those of their families.

## REMEDATION POLICY

- Adopt a recognised definition of victims as “persons who individually or collectively suffered harm, including physical or mental injury, emotional suffering, economic loss or substantial impairment of their fundamental human rights, and where appropriate, the term “victim” also includes the immediate family or dependants of the direct victim and persons who have suffered harm in intervening to assist victims in distress or to prevent victimisation. A person shall be considered a victim regardless of whether the perpetrator of the violation is identified, apprehended, prosecuted or convicted, and regardless of the familial relationship between the perpetrator and the victim”<sup>20</sup>
- Develop and implement a Remediation Policy detailing the provision of remedy to any identified victims, in line with good practice guidance (see ‘operational remediation procedures’ and ‘determining adequate reparation’ below)
- Establish a review procedure to ensure that the remediation policy is effective and to:
  - Review the root causes of any incidents of modern slavery
  - Evaluate how effective the remediation procedure was and amend it accordingly
  - Build learnings into operational procedures to prevent re-occurrence.

20. <https://www.ohchr.org/en/professionalinterest/pages/victimsofcrimeandabuseofpower.aspx>

## OPERATIONAL REMEDIATION PROCEDURES

The UN Office of the High Commissioner for Human Rights' Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law<sup>21</sup> is instructive when developing operational remediation processes and sets out three elements to consider:

- A. Equal and effective access to justice
- B. Adequate, effective and prompt reparation for harm suffered
- C. Access to relevant information concerning violations and reparation mechanisms.

### A. EQUAL AND EFFECTIVE ACCESS TO JUSTICE

- Establish relationships with local NGOs and enforcement authorities to ensure that immediate local support is available for any potential victims identified
- Develop, implement and test a 'Response Plan' that details how managers and supervisors will respond when potential victims of modern slavery are identified
- Train relevant managers who may be involved in potential modern slavery cases to optimise the victim's access to justice and understand the support options that are available to them
- Maintain an effective Response Plan that incorporates the steps within the 'Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain' ([Appendix 9](#))
- Maintain a record of remediation that is provided for each identified victim (see [Appendix 10](#))
- Acknowledge and enable the victims' right to pursue other forms of remedial action at any stage beyond internal remedy mechanisms
- Maintain contact with potential victims referred by your business to the National Referral Mechanism, monitor the victim's progress and provide ongoing assistance where appropriate
- Review the extent and degree your operational processes or lack of controls enabled the exploitation to happen
- Evaluate how effective the remediation procedure is and make amends to your Remediation Policy accordingly.

### B. ADEQUATE, EFFECTIVE AND PROMPT REPARATION FOR HARM SUFFERED

- Establish funding and document how, to what extent and who will provide funds for the different aspects of the remediation programme
- Agree formal written procedures with on-site contractors, sub-contractors and labour providers where victims were working for or supplied by those organisations with regards to remediation and reparation arrangements and responsibilities
- Provide reparation to victims of modern slavery who have been identified within your business (see below, and Walk Free and Chartered Institute of Purchasing and Supply Tool 10: Making a plan for remediation<sup>22</sup> for further guidance on what arrangements should be made)
- Implement an effective system through your direct recruitment and labour supply chain to ensure that no fee or cost for recruitment will be charged to workers. Where this is breached, you will determine arrangements for reparation to victims – see Responsible Recruitment Toolkit Guide to Eliminating Worker Paid Recruitment Fees and Related Costs<sup>23</sup>.

21. <https://www.ohchr.org/EN/ProfessionalInterest/Pages/RemedyAndReparation.aspx>

22. <https://www.cips.org/Documents/Knowledge/Procurement-Topics-and-Skills/4-Sustainability-CSR-Ethics/Sustainable-and-Ethical-Procurement/How-to-Making-a-plan-for-remediation.pdf>

23. <https://responsiblerecruitmenttoolkit.org/open-source-guidance/>

## C. ACCESS TO RELEVANT INFORMATION CONCERNING VIOLATIONS AND REPARATION MECHANISMS

- Enable victims and their representatives to obtain information on the management systems that enabled their exploitation to take place
- Enable victims and their representatives full access to the policies and procedures in place to prevent, respond to and remediate modern slavery cases
- Ensure that all information provided to authorities is verified and true, providing full and public disclosure as long as it does not cause further harm or threaten the safety and interests of the victim, their relatives, witnesses or persons who have intervened to prevent the occurrence of further exploitation
- Communicate any official declaration or judicial decision, including commemorations and tributes, that restores the dignity, reputation and rights of the victim and any persons closely connected to them
- Communicate any judicial and administrative sanctions against the persons liable for the exploitation.

### DETERMINING ADEQUATE REPARATION

Reparation is the act of making amends for a wrong by providing payment or other assistance to those who have been wronged. It is essential that businesses adopt a victim-centred approach when determining reparation.

Businesses should clarify what options for rehabilitation, compensation and restitution they will provide for identified victims of forced labour. This will vary depending on the individual circumstances of each victim and case.

When assigning practicalities such as funding and delivery, consider how operational processes or lack of controls for all agents involved (including labour providers and contractors), may have enabled the exploitation to happen. This process should be formally agreed with all contractors and labour providers and documented.

**Rehabilitation** includes medical and psychological care as well as legal and social services. Decide and document how your business will:

- Support victims and, where relevant, their family into safe accommodation
- Enable access to physiological medical treatment and services
- Collaborate with and fund organisations to provide post-traumatic counselling, psychosocial and other psychological, emotional and social care as appropriate.

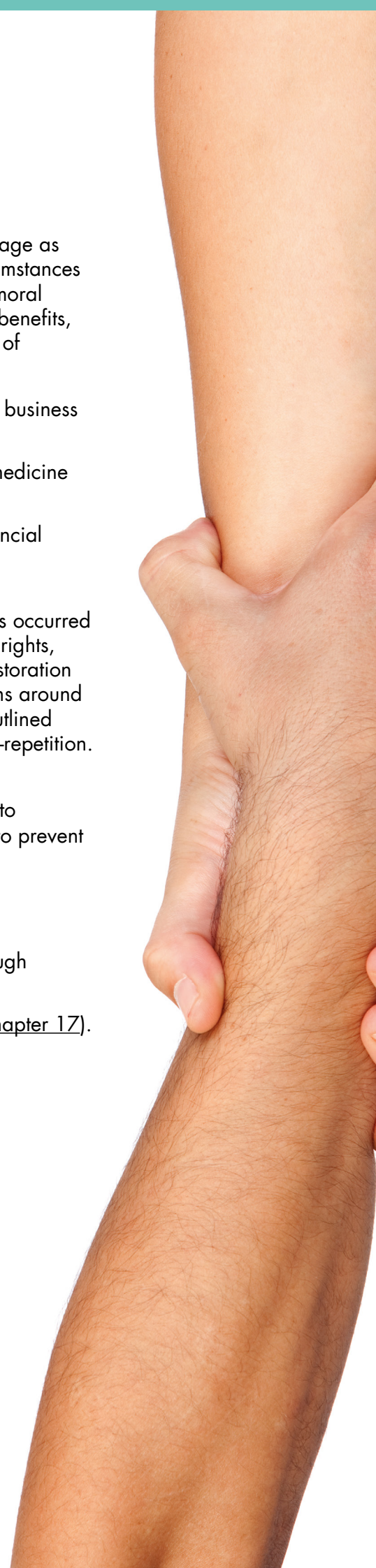


**Compensation** should be provided for any economically assessable damage as appropriate and proportional to the gravity of the violation and the circumstances of each case. Damage may include physical or mental harm, including moral damage, lost opportunities including employment, education and social benefits, material damages and loss of earnings and state benefits, including loss of earning potential. Decide and document how the business will:

- Calculate and repay to victims any earnings paid to them by your business that were stolen from them by their trafficker/controller
- Provide support for costs required for legal or expert assistance, medicine and medical services, and psychological and social services
- Provide ongoing support to the victim such as in the form of a financial stipend whilst the victim is not working.

**Restitution** seeks to restore victims to their original situation before abuses occurred and includes, as appropriate, restoration of liberty, enjoyment of human rights, identity, family life and citizenship, return to one's place of residence, restoration of employment and return of property. Restitution here includes the actions around "access to relevant information", "rehabilitation" and "compensation" outlined above, and includes "satisfaction" for victims including assurance of non-repetition. Decide and document how the business will:

- Review internal policies and procedures to determine what needs to change to prevent re-occurrence. Implement training and systems to prevent repetition
- Apologise to victims and provide public apology, including acknowledgement of the facts and acceptance of responsibility
- Contribute to programmes to assist victims of modern slavery through vocational training or other appropriate measures
- Provide opportunities to reintegrate victims back into work (see [Chapter 17](#)).



# REINTEGRATING SURVIVORS OF MODERN SLAVERY BACK INTO WORK

Successfully reintegrating survivors of modern slavery back into work is a rewarding process for all involved whilst allowing the business to be active in remediating and contributing to their workforce and wider business and social goals.

Support agencies wish to work alongside businesses to sponsor survivors and continue their good work.

Support agencies provide social, emotional and psychological support in line with the Survivor Care Standards. This is rarely wholly government-funded, and participating businesses will need to part-fund this support. The amount will vary on a case-by-case basis.

Survivors of modern slavery are usually hardworking individuals but because of their experiences, their confidence, health, self-esteem and trust are often adversely affected. It is critical to find the right paid employment in the UK that is suitable to their needs and experience and is sustainable, in order to enable survivors to take responsibility for themselves and their families.

Access to decent work increases stability and reduces uncertainty and precarious living, which in turn reduces the likelihood that exploitation will be a part of that person's future and is therefore key to their long-term wellbeing and happiness.

Some survivors of trafficking offences may be waiting confirmation of their right to work in the UK but are permitted to volunteer while their case is being reviewed.

For some survivors, returning to work will be straightforward. For other survivors who have been more traumatised, reintegration may involve taking part in a number of work placements in more than one business in order to find the right role and environment in which they can flourish. Survivors will have often led a chaotic lifestyle whilst under the control of their exploiters and may find integration into mainstream employment challenging as they adjust to their new circumstances.

With the right opportunities to work and the assistance of both the business and support agency, survivors can significantly benefit from and contribute to the local community and wider society, as well as the business where they settle to work.

While there is the utmost discretion around such interventions, those individuals in businesses who have helped reintegrate survivors report a deep sense of job satisfaction.

## PREPARING YOUR BUSINESS TO SUPPORT REINTEGRATION OF SURVIVORS

Businesses interested in integrating survivors into their workforce should consider the following:

- Is your business committed and able to fully support the survivor through the reintegration process? To enable placements to be successful your business must commit to provide the required support mechanisms.
- Which roles, working hours or shifts are available that are both suitable and attractive to survivors and meet the business's needs?
- Can your business support flexible working arrangements if required? Allowances may need to be made for ongoing medical, counselling or investigation appointments.
- Are there good public transport links available for your site?
- Who in your business will be the lead in establishing and managing arrangements with the support agency?
- Who in your business at a site level will be the lead in establishing and managing arrangements with the survivor?
- Does your business have the resources to assign a workplace buddy to act as peer support for the survivor? Buddies will require prior training with the support agency to gain an understanding of the survivor experience and how to be an effective buddy. Key characteristics of a good buddy are compassion, understanding, patience and discretion.

To identify and initiate conversations with survivor reintegration support agencies in your region, please visit and contact:

- <https://www.salvationarmy.org.uk/>
- <https://www.migranthelpuk.org/>





## PROVIDING WORK PLACEMENTS

Support agencies have developed and will work to a specific process model to foster effective reintegration. Partnering businesses will need to discuss, understand, agree to and embrace this model prior to starting the recruitment process.

Placements in businesses are usually assessed and agreed on a survivor case-by-case basis. Multiple placements in one business at any one time are unlikely to occur.

Survivors often wish to remain in their own locality due to community links and family reasons. In instances where survivors are able to move, the opportunity for standardised, regulated accommodation, such as that offered on many farms, may be a real advantage, allowing them to work, save and return home with dignity and some financial resources, should they choose to do so. In such cases, the accommodation should be optional, not be perceived as a necessity and workers must not be tied to it as a condition of the job.

With fully informed consent from the survivor, the support agency will share with the partner business information pertinent to their client's (the survivor's) wellbeing about specific vulnerabilities and any requirements the survivor may have, to ensure that appropriate support is put in place to enhance the chances of a successful placement. Confidentiality with this information in accordance with GDPR requirements is critical. This data must not be shared with anyone in the business who does not need to know.

Prior to the engagement of the survivor, the support agency and business will agree the objectives and criteria that will be considered a success during the placement period. Following this, the same parties will meet with the survivor to allow them to share their hopes for the placement and ensure that everyone is working towards the same goals.

During the placement period, the support agency and business will meet at regular intervals to discuss progress, adapt working arrangements as required and review progress against the objectives and success criteria.

Success in reintegrating survivors requires a partnership between the support agency, the business and the survivors themselves. Working collaboratively, openly and flexibly with good and accessible channels of communication are key factors in a successful placement.

# MODERN SLAVERY STATEMENT

# GOOD PRACTICE

Businesses should meet their legal reporting obligations within the Modern Slavery Act 2015 Section 54 Transparency in Supply Chains<sup>24</sup> provisions and The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015<sup>25</sup>.

A commercial organisation that supplies goods or services and has a total annual turnover of £36 million must prepare a slavery and human trafficking statement for each financial year of the organisation.

As per the government guidance Transparency in Supply Chains etc. A practical guide<sup>26</sup> paragraph 2.5, the objective of requiring reporting is:

- for “all businesses to develop an appropriate and effective response to modern slavery” and
- to “create a race to the top by encouraging businesses to be transparent about what they are doing, thus increasing competition to drive up standards.”

Businesses that do not meet the legal financial threshold to report should consider whether they wish to produce and voluntarily publish such statements.<sup>27</sup>

The UK Government provides online guidance on how to produce a modern slavery statement .

Content should include the following:

- Organisation structure and supply chains
- Policies related to slavery and human trafficking
- Due diligence processes
- Risk assessment and management
- Key performance indicators to measure effectiveness of actions taken
- Training on modern slavery and human trafficking.

The actions captured in the Good Practice Implementation Checklist can be reported as steps taken to prevent slavery and human trafficking taking place within your business and supply chains.

The University of Nottingham Rights Lab Modern Slavery Evidence Unit Research Briefing<sup>28</sup> provides good practice recommendations for businesses in completing modern slavery statements.

Businesses may also be guided by the methodology against which company transparency and disclosure statements on forced labour in supply chains are assessed, for example, Corporate Human Rights Benchmark Pilot Methodology 2016<sup>29</sup> and Know the Chain Transparency Snapshot: A Pilot Benchmark Report<sup>30</sup>.

24. <https://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>

25. <https://www.legislation.gov.uk/ukdsi/2015/9780111138847>

26. <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide>

27. <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>

28. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/mseu/mseu-resources/2019/november/briefing-agriculture-and-modern-slavery-act-reporting.pdf>

29. <https://www.corporatebenchmark.org/chrb-methodology>

30. <https://knowthechain.org/benchmark/>

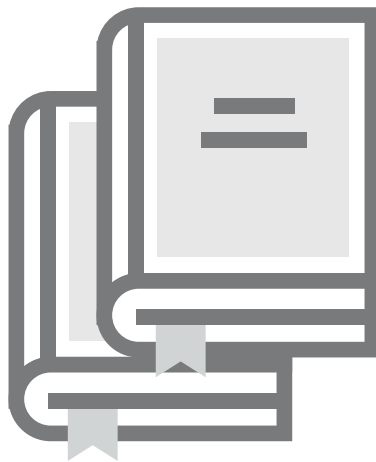


# SECTION C

## APPENDICES OF USEFUL RESOURCES

All appendices may be downloaded at

[www.stronger2gether.org](http://www.stronger2gether.org)



# APPENDIX 1

## TEMPLATE POLICY “TACKLING MODERN SLAVERY AND HIDDEN LABOUR EXPLOITATION”

### Policy Statement

[Company] commits to developing and adopting a proactive approach to prevent, respond to and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

**Debt-bonded labour** is where a person’s labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

### Scope

To which site(s) does this policy apply?

### Responsibility

Who has overall responsibility for this policy?

### Policy Commitments

(refer to the detail in the Good Practice Implementation Checklists, Response and Remediation sections in this toolkit in developing your specific commitments)

#### A. COMMITMENT to tackle modern slavery risks within your business

1. Define all roles and responsibilities for tackling modern slavery risks within your business
2. Detail the training that your business undertakes to build capacity and capability to prevent and address modern slavery risks
3. Refer to the management systems that your business has developed and implemented to prevent and address modern slavery risks at your site, including Anti-Bribery and Corruption Policy, Responsible Recruitment Policy, Recruiter Compliance Principles, Serious Workforce Incident Procedure, Workplace Incident Investigation Checklist, Workplace Critical Issues Report, Worker Questionnaire, Worker interview questions and others as required.

#### B. ASSESSMENT of modern slavery risks within your business

1. Outline your methodology and process to map, understand and prioritise modern slavery risks within your business with regards to direct workers, agency workers and on-site contractors.

### **C. ACTION to prevent and deal with identified risks of modern slavery within your business**

1. Outline your actions to ensure ongoing Workforce Awareness Raising and Engagement to prevent and deal with identified risks of modern slavery
2. Outline your actions to ensure ongoing Supervisor/Team Leader/Support Staff Engagement to prevent and deal with identified risks of modern slavery
3. Outline your good practice in the recruitment of directly employed workers to prevent risks of modern slavery
4. Outline how you proactively analyse worker records for modern slavery “Alert Flags”
5. Outline your good practice in your engagement with labour providers with regards to the recruitment and use of agency workers on your site to prevent risks of modern slavery
6. Outline your good practice in your engagement with contracting companies with regards to the recruitment and use of contractors on your site to prevent risks of modern slavery
7. Outline the systems that your site has in place to effectively enable reporting of potential indicators of modern slavery.

### **D. RESPONDING to protect and provide remedy for victims of modern slavery within your business**

1. Refer to your “Response Plan” which details how your business will ensure that it responds effectively to potential indicators of modern slavery to safeguard and provide appropriate support to victims
2. Refer to your “Remediation Policy” which details how your business will enable victims to receive relevant information, access to justice and reparation for harm suffered, with the objective of restoring individuals to the situation in which they would have been, had the impact not occurred.

### **E. MONITOR progress to prevent, respond to and remediate the risks of modern slavery within your business**

1. Outline your processes to monitor the progress made to prevent, respond to and remediate the risks of modern slavery within your business with regards to direct workers, agency workers and on-site contractors
2. Specify your process for ongoing continuous improvement and for formally reviewing all procedures and arrangements at least on an annual basis.

### **F. COMMUNICATE the steps that you have implemented to prevent, respond to and remediate the risks of modern slavery within your business**

1. Detail how your business communicates its efforts to prevent, respond to and remediate modern slavery risks and the effectiveness of these to relevant stakeholders
2. Where your business produces a Modern Slavery Statement, detail your commitment to be open and transparent and to report in line with recognised good practice.

# APPENDIX 2

## TEMPLATE RECRUITER COMPLIANCE PRINCIPLES

[This is a template to be modified as required. This document is for use by labour providers and employers for each recruiting individual to sign before interviewing any applicants and is to be stored in personnel files].

Recruiter Name ..... Location .....

**I confirm that I will:**

1. Only interview applicants in an approved location.
2. Not allow job applicants to complete registration documents on behalf of others.
3. Not use a supplier for labour outside of the business approved suppliers without first obtaining authorisation from a manager and approval from the client in writing.
4. Not accept money, favours or any gifts at all from job applicants or workers.
5. Not loan any personal money to temporary workers.
6. Notify a manager when informed by a job applicant or worker that they have paid money to be introduced to the Company.
7. Not allow unauthorised agents or individuals to introduce job applicants to the Company, including friends, family or "local contacts" to source workers to satisfy urgent demand.
8. Notify a manager when suspecting an individual of introducing job applicants to the Company for personal gain.
9. Not act as a landlord or be involved in the provision of accommodation, transport or other paid-for services to workers.
10. Not allow anyone other than a person authorised by management to choose which workers are selected for work shifts.
11. Not force or coerce temporary workers to work against their will.
12. Not threaten or subject workers to physical or mental mistreatment.
13. Treat applicants and workers with dignity and respect.
14. Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately.

**I confirm that I understand and will comply with the above principles.**

Recruiter's Signature .....

Date .....

**I have checked and confirm that the Recruiter understands the above principles.**

Manager's Signature .....

Manager's Name .....

Date .....

# APPENDIX 3

## STRONGER TOGETHER TRAINING FLYER

**stronger  
together**

tackling modern slavery in supply chains

### TRAINING OPPORTUNITIES

FACE-TO-FACE AND ONLINE WORKSHOPS AVAILABLE

DESCRIPTION	FOR	COST PER DELEGATE
<b><u>Tackling Modern Slavery in UK Businesses</u></b> Understand the responsibilities and best practice associated with tackling modern slavery in UK businesses.	Those responsible for modern slavery from policy to implementation – suitable for those new to the subject or those seeking a refresher.	<b>Free delegate places available – see website for details</b> £99 (+VAT) online workshop for ALP members and suppliers/service providers to project sponsors £145 (+VAT) face-to-face workshop £150 (+VAT) online workshop for all other delegates £195 (+VAT) face-to-face workshop
<b><u>Tackling Modern Slavery through Purchasing Practices</u></b> Gain the skills and tools to develop and implement a comprehensive programme to tackle modern slavery through purchasing practices.	Those responsible for the strategy and policies and the operational implementation for tackling modern slavery in purchasing.	£265 (+VAT) face-to-face workshop
<b><u>Tackling Modern Slavery in Global Supply Chains</u></b> Gain a good understanding of supply chain risks, knowledge of strategic frameworks for addressing risk with suppliers, and detailed information about remediation policies and effective monitoring and reporting.	Individuals responsible for labour practises in supply chains, HR, procurement, technical, responsible sourcing, social compliance and risk management.	£265 (+VAT) face-to-face workshop
<b><u>Tackling Modern Slavery in the Construction Sector</u></b> Get informed and equipped to address forced labour, implement good practice and minimise the risk to your business and supply chains. Developed with the CIOB.	Construction site managers and project managers, those responsible for addressing modern slavery and/or human rights within the business and across the whole supply chain.	<b>Free delegate places available – see website for details</b> £125 (+VAT) online workshop (two sessions) for those with a valid discount code provided by a project sponsor £145 (+VAT) face-to-face workshop £195 (+VAT) online workshop (two sessions) all other delegates £225 (+VAT) face-to-face workshop
<b><u>Good Practice in Handling Suspected and Reported Cases of Forced Labour</u></b> Understand your responsibilities and best practice in reporting and dealing with suspected and reported cases of modern slavery in your business.	Those responsible for tackling modern slavery from policy to implementation, including HR, CSR, technical and operational managers.	£165 (+VAT) face-to-face workshop
<b><u>Investigative Interviewing Skills in the Workplace</u></b> Get the skills and confidence required to obtain detailed and accurate information through planning and conducting an interview with an investigation focus.	Auditors and those required to conduct interviews in the workplace, HR, Recruitment and Compliance team members.	£265 (+VAT) online workshop £265 (+VAT) face-to-face workshop
<b><u>Tackling Forced Labour in Agri-Businesses - SA</u></b> Understand the responsibilities and best practice associated with tackling forced labour in agri-businesses in South Africa.	South African agri-businesses, those responsible for recruitment, HR or worker representatives.	Free

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[info@stronger2gether.org](mailto:info@stronger2gether.org)



+44 (0) 1276 919090



## E-LEARNING COURSES

### GENERAL AND ROLE-SPECIFIC E-LEARNING MODULES ON TACKLING MODERN SLAVERY.

Engaging and interactive e-learning modules providing a flexible and cost-effective training solution for your workforce enabling learners to complete at their own pace and location. Knowledge tests throughout reinforce understanding and a printable worksheet available on completion ensures key information is easily accessible, with each course taking approximately 30-45 minutes to complete (depending on the course).

Equipping your staff to detect, deter and deal with modern slavery is a significant yet easily achievable step through our e-learning training.

DESCRIPTION	FOR	SECTOR	COST
<b>Tackling Modern Slavery in Businesses</b> General UK version	Businesses based within the UK.	All sectors.	For up to 100 licences: £20 per user per course*.  Discounts available for more than 100 licences.  Other licence options are available.  *Excluding the provision of Learning Management System.
<b>Tackling Forced Labour in Businesses</b> General version for businesses outside the UK	Businesses based outside the UK.	All sectors.	
<b>Tackling Modern Slavery in the UK</b> Supervisors	Frontline supervisors.	All sectors, in particular construction, agriculture and manufacturing.	
<b>Tackling Modern Slavery in the UK</b> Recruiters	Recruiters, labour providers, HR.	All sectors, in particular recruitment.	
<b>Tackling Forced Labour for Businesses</b> Agriculture	Sections for: Supplier/brand senior management and CSR   Supervisor   Factory/site owner or management   Worker	Businesses everywhere, Agriculture.	
<b>Tackling Forced Labour for Businesses</b> Aquaculture and fishing	Sections for: Supplier/brand senior management and CSR   Supervisor   Factory/site owner or management   Worker	Businesses everywhere, Aquaculture and fishing.	
<b>Tackling Forced Labour for Businesses</b> Manufacturing	Sections for: Supplier/brand senior management and CSR   Supervisor   Factory/site owner or management   Worker	Businesses everywhere, Manufacturing.	

## BESPOKE TRAINING AND SUPPORT SERVICES

Stronger Together offers in-house training and consultancy services to meet your organisation's specific needs, and support you to tackle modern day slavery within your business and supply chains. Sessions are delivered by our network of expert trainers, consultants and lawyers. Contact us to find out more and discuss your needs.

**FIND OUT MORE AND BOOK YOUR TRAINING TODAY**

**[www.stronger2gether.org](http://www.stronger2gether.org)**

**[info@stronger2gether.org](mailto:info@stronger2gether.org) / +44 (0) 1276 919090**

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 [info@stronger2gether.org](mailto:info@stronger2gether.org)

 +44 (0) 1276 919090

# APPENDIX 4

## RISK ASSESSMENT TOOL

The tool below sets out a process for Employers and Labour Providers/Recruitment Businesses to assess risk across their operational sites, labour providers, recruitment intermediaries and contractors.

Businesses should use this tool to identify where activity should be prioritised, both internally and with which recruitment intermediaries and contractors. See the Good Practice Implementation Checklists for a comprehensive list of actions to take.

STEP NO.	ACTION	COMMENTARY
1	List all operational sites within your business or departments within your site.	For example: production, co-packing centre, distribution warehouse, administration unit.  For example: production, warehouse, engineering, quality control, tray wash, canteen facility.
2	List all contractors and recruitment intermediaries including labour providers, sub-contracted agents and labour brokers that service these sites / departments.	For example: catering, cleaning, security, facilities management, waste processing, engineering/equipment servicing, pest control, labour provider, recruitment agent, labour broker.
3	Identify who owns the contract for each and educate those stakeholders on the reason for risk profiling.	Contract owners are important stakeholders and should be engaged at the earliest opportunity. They may have conducted their own risk profiling on these service providers that should be considered. They can provide insight on the challenges you may face working with high risk contractors and recruitment intermediaries and if there are existing management or performance programmes in place.
4	Collect information on annual spend and length of relationship for each contractor and recruitment intermediary, including forecast spend for the following 12 months.  Determine what is considered high spend for your business / site.	Generally, the larger the annual spend the greater the significance and risk to the operation of your business / site.  Understanding the commercial relationship with contractors and recruitment intermediaries will help to identify which of these service providers are considered critical to your business.  Where you have an established history of working with a contractor or recruitment intermediary you are likely to have increased leverage.



5	<p>Assess risk for each site (if applicable), contractor and recruitment intermediary to help identify how likely they may be impacted by modern slavery issues.</p> <p>Risk factors to consider:</p> <ul style="list-style-type: none"> <li>• Industry / site type</li> <li>• % of migrant workers</li> <li>• % of temporary / agency roles</li> <li>• % of fixed-term contract roles</li> <li>• Skill profile</li> <li>• Labour sourcing channels</li> </ul>	<p>Industry sectors that have a large proportion of low-skilled roles or temporary/fixed-term contracts are considered higher risk, for example manufacturing, agriculture, construction, beauty, car wash, cleaning and waste processing. Statistics from the <a href="#">National Referral Mechanism</a> and <a href="#">Modern Slavery Helpline</a> indicate where previously reported potential victims of modern slavery have been identified.</p> <p>Migrant workers and workers with temporary or short term contracts are vulnerable to exploitation. Businesses where the majority workforce is composed of vulnerable workers are therefore more likely to be targeted by exploiters and at greater risk of being impacted by modern slavery issues.</p> <p>Exploiters target businesses who operate with low-skilled roles that may not require a high level of English, for example processing and machine operatives, cleaners, freight handlers, warehouse operatives, catering assistants, farm labourers, refuse workers etc. Consider which roles the labour providers and recruitment intermediaries are supplying you with. Which of these service providers operate with mostly low-skilled roles?</p> <p>Recruitment channels often involve numerous parties, in many cases through informal relationships where terms and conditions are poorly defined, which can make exploitative practices difficult to monitor and detect. Consider if there are actors within the various levels of the labour supply chain that have informal arrangements in place and could therefore pose a greater risk to your business, for example worker or peer referrals, labour brokers, sub-contracted labour providers or recruiters. Do they have the appropriate licences in place to operate?</p>
6	<p>Assess understanding and capacity of each site (if applicable) contractor and recruitment intermediary to identify which have the least controls in place to deter, detect and deal with issues of modern slavery.</p> <p>Consider:</p> <ul style="list-style-type: none"> <li>• Do they understand the risks of modern slavery to their business?</li> <li>• Do they have policies and process in place to manage the risks of modern slavery?</li> <li>• Have workers completed any training on modern slavery?</li> <li>• Are these service providers willing to be supported to improve policy and practice?</li> </ul>	<p>Use the Good Practice Implementation Checklist to support this assessment and to identify what operational controls are in place.</p>
7	<p>Review all of this information to identify which sites (if applicable) contractors and recruitment intermediaries pose the highest risk and where you have the most leverage to drive change.</p> <p>Prioritise activity with these sites (if applicable), contractors and recruitment intermediaries.</p>	<p>Use the completed Good Practice Implementation Checklist to create an action plan in collaboration with the priority sites (if applicable), contractors and recruitment intermediaries.</p>

# APPENDIX 5

## TEMPLATE WORKER QUESTIONNAIRE

[This is a sample questionnaire for modification as required to be issued confidentially and with the option to respond anonymously by workers].

We want you to have a positive experience working with us. We do not want you to feel harassed, discriminated against, bullied or coerced. At no time should you be asked for gifts or money for work with us.

This confidential questionnaire will help us to monitor your experience and take action where necessary. You may complete the questionnaire anonymously or you can enter your personal details – this is your choice. You should return the questionnaire in the stamped addressed envelope provided. Any matters raised will be dealt with confidentially.

Your name (Optional):	Your place of work (Optional):
Your telephone no. (Optional):	Your email (Optional):

Recruitment		
Did you have to pay anyone in the labour provider to get a job?	YES / NO	Comment
Did you have to pay anyone at the sites you work at to get a job?	YES / NO	Comment
Did you have to pay anyone else to help you get a job with the labour provider?	YES / NO	Comment
Do you have to pay anyone in the labour provider to get regular work?	YES / NO	Comment
Do you have to pay anyone at the sites you work at to get regular work?	YES / NO	Comment
Do you have to pay anyone else to get regular work?	YES / NO	Comment
Are you required to occupy, or pay for, specific accommodation, in order to get regular work?	YES / NO	Comment
Are you required to pay for any other services or provide favours in order to get work or access to particular shifts?	YES / NO	Comment
Have your original ID papers been withheld by anyone in LP?	YES / NO	Comment
Do you feel that you can leave LP of your own free will without suffering any penalty or detriment?	YES / NO	Comment
Treatment at work		
Have you been subject to verbal or physical abuse by anyone in LP? By this we mean things like being shouted at, being pushed, kicked or having things thrown at you?	YES / NO	Comment
Have you been bullied or harassed by anyone in LP?	YES / NO	Comment
Have you been subject to verbal or physical abuse, threats, sexual or other harassment by anyone at our clients?	YES / NO	Comment
Have you been treated unfairly because of your race, colour, religion, nationality, sex, pregnancy, disability or age?	YES / NO	Comment
Have you been bullied by anyone at the sites you work at?	YES / NO	Comment
Has anyone in the labour provider threatened you? For example to limit the amount of work they give you or not to offer you any more work?	YES / NO	Comment
Have you ever been forced to work long hours, overtime or on any days when you didn't want to by anyone in the labour provider?	YES / NO	Comment
Have you ever been forced to work long hours, overtime or on any days when you didn't want to by the sites you work at?	YES / NO	Comment

Have you ever been forced to work when you didn't want to by anyone in the labour provider?	YES / NO	Comment
Do you feel free to refuse overtime?	YES / NO	Comment
Are you able to take the legal minimum rest between shifts if you wish to?	YES / NO	Comment
Are you able to take the legal minimum rest days if you wish to?	YES / NO	Comment
Are you able to book and take holidays in accordance with any reasonable rules in place?	YES / NO	Comment
Have you been asked to undertake hazardous work, or other work without appropriate safety training or equipment?	YES / NO	Comment
Have you been prevented from joining a trade union or been penalised for doing so?	YES / NO	Comment
<b>Pay</b>		
Do you owe money to anyone in the labour provider such that you feel you cannot leave of your own free will?	YES / NO	Comment
Has anyone in the labour provider loaned you money that you have to repay?	YES / NO	Comment
Has anyone in our client loaned you money that you have to repay?	YES / NO	Comment
Have you been withheld pay for work you have performed?	YES / NO	Comment
Are you paid correctly for the hours you work?	YES / NO	Comment
Are you paid correctly for your holidays?	YES / NO	Comment
Have you had any money unfairly deducted from your wages?	YES / NO	Comment
Are you free to open and be paid into the bank account of your choice?	YES / NO	Comment
Are you in control of your own bank account and able to deposit and take out money as you wish?	YES / NO	Comment
<b>Accommodation and Travel</b>		
Do you rent your accommodation from anyone who works for or who is linked to the labour provider?	YES / NO	Comment
Do you rent your accommodation from anyone who works for or who is linked to our client?	YES / NO	Comment
Are you threatened by your landlord for unpaid rent?	YES / NO	Comment
Is your accommodation safe and well maintained?	YES / NO	Comment
Are you or have you been threatened with immediate eviction?	YES / NO	Comment
Can you leave your accommodation if you wish with reasonable notice and no financial penalty?	YES / NO	Comment
Are you free and able to return home to your country of origin when you wish?	YES / NO	Comment
Are you free to buy and prepare food of your choice?	YES / NO	Comment
Are you free to travel to and from work using the transport method of your choice?	YES / NO	Comment
<b>Raising Problems</b>		
Would you raise a complaint to the labour provider? If not, why?	YES / NO	Comment
Do you feel your complaints are dealt with properly?	YES / NO	Comment
Do you know how to raise a confidential complaint?	YES / NO	Comment

**Most complaints can be resolved verbally with your [Employer/Labour Provider] Representative.**

If your complaint has not been resolved to your satisfaction then put it in writing to your Contract Manager.

If you are still not satisfied or your matter is sensitive or confidential then contact:

**the [Employer/Labour Provider] Helpline on .....**

**by emailing ..... or by writing to [Employer/Labour Provider] Helpline at .....**



# APPENDIX 6

## WORKPLACE INCIDENT INVESTIGATION CHECKLIST

[This is a template checklist to be used to monitor and verify all the required steps of a workplace incident investigation have been completed].

Investigator Name .....

Job Title .....

Investigation Title .....

Investigation Description .....

ACTION		✓	INITIALS
<b>Prior to commencement of investigation</b>			
1	The investigating manager confirms that s/he has the knowledge and skills required to carry out the investigation in a timely, professional and unbiased manner.		
2	Appropriate business policies and procedures, e.g. Health and Safety, Responsible Recruitment, Disciplinary, Grievance, Staff Handbooks etc. have been reviewed to determine whether they offer guidance or direction to the investigation. Consult with HR specialist if required.		
3	Identify what evidence might need to be gathered and how to get it, e.g. CCTV footage or recordings, emails or other documents and witness statements.		
4	Identify the "Deciding Manager" who will receive the Investigation Report and who will determine the outcome and remediation based upon the findings.		
5	Identify all witnesses and others (such as technical experts, who are not directly involved but can add insights) who will need to be interviewed, and in which order, and prepare an outline of questions to ask each individual.		
6	Map out a timetable for the investigation and report writing to ensure that the process is conducted in a timely manner that best serves the particular circumstances of the matter.		
7	If a worker is under investigation, inform them of the issue for which they are under investigation, the date on which the investigatory meeting will take place, their right to be accompanied and ensure they have a copy of the relevant procedures.		
<b>Handling an investigation meeting</b>			
8	Arrange interpretation to support communication, where necessary. Any interpreter should have the knowledge and skills and/or have received training to provide accurate interpretation (relay only what has been said by each party) and remain independent (in no way influence the conversation).		
9	Invite HR/staff member or other manager to the meeting to take notes and assist with investigation.		
10	Prepare a set of questions based on the evidence and information available.		
11	Interview individuals in a location free from interruptions, e.g. phone calls, where the interview will be kept confidential and where individuals feel comfortable.		

12	Introduce those present and outline their roles.		
13	Inform the interviewee of the incident under investigation for which the investigation is necessary.		
14	Confirm that copies of the statement and/or notes will be issued to the other parties involved in the case.		
15	Where appropriate, offer the witness the opportunity to write a statement of events (or write on their behalf) using the Investigation Statement/Notes form (see later in this Appendix). Ensure completion is in ink, that amendments are initialled (do not use correction fluid), draw a line through unused parts of the form and ensure that each page is signed and dated.		
16	Where a statement of events is not appropriate, conduct the meeting asking relevant questions and noting answers.		
17	If necessary, adjourn the meeting. Review the evidence highlighting any issues that are vague or incomplete. Update the prepared list of questions and reconvene the meeting. Repeat this step until you are satisfied that you have all the relevant information from the interviewee.		
18	Ask any final questions and allow the interviewee to add any other comments to the investigation.		
19	Summarise the discussion, gain agreement to this and conclude the investigation meeting.		
20	Prepare the witness statement/notes and ensure that they are read and signed by the interviewee to signify that they are accurate. Ensure that the interviewee has a copy.		

### Concluding the investigation

21	Collect and review witness statements and interview records.		
22	Collect and review any relevant written records and documents, e.g. timesheets, meeting notes, maintenance records and accident reports.		
23	Collect and review any relevant and lawfully gained physical evidence such as CCTV, telephone records or results of searches.		
24	Consider what the evidence reveals. Determine whether there is a need to gather further evidence, conduct additional interviews or whether the investigation can be concluded.		

### Writing an investigation report

25	Determine whether the report is to be written only to present the investigation evidence and findings or whether it will also include recommendations on proposed outcomes, actions and remediation.		
26	Collate all the evidence collected in to a structured report. Findings and conclusions should be evidence-based and balanced, showing all sides of the arguments.		
27	Recommendations should be proportionate and consistent, and in accordance with the established procedures. When making decisions based on evidence, specify whether the burden of proof is "on the balance of probabilities" or "beyond reasonable doubt". Explain how the evidence leads to the recommendations and any mitigating circumstances that have been taken into account.		
28	Decide on your recommendation (action) based upon the evidence. This could be no action necessary, changes to policies or procedure, staff training (or retraining), communication (or re-communication) of requirements, further investigation or disciplinary action. Decide on your remediation (i.e. putting right the wrongs for any victims or individuals adversely affected) such as an apology or compensation. Determine actions to prevent a reoccurrence.		

## Acting on the investigation report

29	On receiving and reviewing the Investigation Report, the Deciding Manager will decide whether to accept the report, ask further questions of the Investigating Manager, require the Investigating Manager to conduct further interviews and evidence collection and submit the additional findings, or reject the Investigation Report and require a new Investigating Officer to be appointed to conduct a fresh investigation.		
30	Having accepted the Investigation Report as concluded, the Deciding Manager will decide whether to accept the recommendations (action) or the remediation, and actions to prevent a reoccurrence or if these should be modified in any way.		
31	The Deciding Manager will inform all relevant parties of the recommendations (action), the remediation and actions to prevent a reoccurrence.		
32	On request, the Investigation Report and all evidence should be made available to the complainants who may determine that they wish to appeal the decision, or propose additional or alternative actions, remediation and steps to prevent a reoccurrence.		
33	If appealed, the appellant should be given opportunity to present their case to a new and unbiased Deciding Manager. The new Deciding Manager will determine whether further investigation, interviews and evidence-gathering are required. The new Deciding Manager will decide whether to uphold the original decision and recommendations (action) or the remediation, and actions to prevent a reoccurrence or to reverse them, modify or add to them. The new Deciding Manager will inform all relevant parties as required.		
34	Internal procedures will determine whether there is a further right of appeal.		

# INVESTIGATION STATEMENT/NOTES FORM

Description of case under investigation:			
Interviewee's name		Meeting date	
Incident date and time		Meeting time	
Others present at the meeting			

If making a statement of events, please relate the incident step by step and state in your own words what happened and what you saw and heard, including names of any people who were there. Include dates and times.

To the best of my knowledge, this statement is a full, accurate and true account in all respects. I understand that knowingly making a deliberately false or misleading statement will render me liable to disciplinary action.

<b>Signed</b>	<b>Date</b>
---------------	-------------

# APPENDIX 7

## SAMPLE WORKER INTERVIEW QUESTIONS

[Below is a range of sample questions as a basis for use by the investigating manager in face-to-face interviews with workers]

### RECRUITMENT

How well do you speak English?  
What agencies/employers do you work for?  
How did you find out about the work?  
Were you promised a job?  
How was the job described to you?  
Was the job how it turned out to be, e.g. pay rate, number of hours?  
Did you have to pay a fee for the job?  
What have you paid to get this job?  
Did you have to pay any money for other services such as translation or travel?  
How did you travel to the UK?  
Who arranged and paid for the travel?  
How much did the journey cost?  
Where in the UK did you travel to?  
Who met you?  
Where were you taken?  
Where is your ID?  
Is your ID usually held by someone else? Who?

### PAY

Do you owe anyone any money? (If the answer is yes, then ask who and how much and what they have to pay back and how)  
Does anyone owe you any money?  
How much were you paid last week? How many hours had you worked?  
Was the pay correct?  
Do you receive a payslip?  
What deductions are made from your wages?  
Have you been withheld pay for work you have performed?  
Have you had any money unfairly deducted from your wages?  
Are you free to open and be paid into the bank account of your choice?  
How many bank accounts have you opened?  
What are the names of the banks?  
Have you got the bank card and PIN number? (If the answer is no, ask where they are)  
When you opened that bank account, who went with you?  
Who told you to go to this bank (or these banks)?  
Examine the bank card if in possession – is the PIN number written on the rear? If it is, it may be an indication of forced labour so ask the question: What is this number on the rear of the card?  
Does anyone else use your bank account?



## TREATMENT AT WORK

Since you have been working here, how have you been treated?

What do you like about working for the labour provider/labour user?

What do you not like about working for the labour provider/labour user?

Have you been subjected to verbal or physical abuse by anyone in the labour provider/labour user? By this, we mean things like being shouted or sworn at, being pushed, kicked or having things thrown at you.

What hours do you normally work?

How are the hours allocated amongst workers?

Are you happy with the hours that you are asked to work?

If you didn't want to work the hours allocated, what would happen?

Have you ever been forced to work long hours, overtime or on any days when you didn't want to by anyone in the labour provider/labour user?

What breaks do you take when you are working?

How many days do you have off each week?

How do you book holiday leave?

Have you taken any holiday?

Were you paid?

Have you taken any sick leave?

If you had to take sick leave, would you be paid?

What training were you provided with?

Did you have to take a test after the training?

What help was given to you during the test?

What risks are there in your work?

Have you been provided with PPE (May need explaining)

How much did this cost you?

If you lose the equipment or damage it, what will happen?

Have you been prevented from joining a trade union or been penalised for doing so?

## ACCOMMODATION AND FOOD

What address did you provide to the agency?

How did you find your accommodation?

Who is the landlord?

How much rent do you pay?

What happens if you can't pay the rent?

Who collects the money?

If you wanted to leave the house, can you?

How many people live in the house?

How many people share your room?

Are the other people related to you?

Which family members are you here with?

Do you have a written agreement with the landlord?

If you wanted to leave the house, what notice do you have to give to the landlord?

Do you rent your accommodation from anyone who works for or who is linked to the labour provider/labour user?

If you left the house, would you lose your job?

If you left your job, would you have to leave the house?

What is the condition of the house like?

Is your accommodation safe and well maintained?

How many smoke alarms are in the house?

Does the heating work?

How many bathrooms are there?

What is the condition of the house like?

What are the rules of the house?

Are you threatened by your landlord for unpaid rent?

Are you or have you been threatened with immediate eviction?

Are you free to buy and prepare food of your choice?

Who provides your food?

If provided with food, ask: What did you eat yesterday? Is this normally what you would eat?

If purchase own food: Where do you shop for food?

Do you have enough money to buy food? (If the answer is no, explore what they do for food – some may go into drop-in centres)

## TRAVEL

Are you free and able to return home to your country of origin when you wish?

Have you been in contact with your friends and family since you came to the UK?

When was the last time you spoke with them?

Are you free to travel to and from work using the transport method of your choice?

How do you travel to work?

How much does this cost you?

Do you have to use this transport? (If yes, ask why)

## RAISING PROBLEMS

If there was a problem at work, what would you do about it?

Do you feel your complaints are dealt with properly?

Have you made any complaints about work? If yes, ask: How did you feel about the way it was dealt with?

How have you been treated since making the complaint?

If you wanted to report an issue but did not want anyone to know it was you reporting, how would you report it?



# APPENDIX 8

## WORKPLACE CRITICAL ISSUES REPORT

This form is a summary record for when it is suspected that an applicant or job holder is a victim of trafficking, forced labour or other third-party work-related exploitation. Any notes made will supplement this record.

<b>Business Name:</b> Organisation owner:	Site name (if different): Address:
<b>Investigating Manager's Name:</b> Mobile No.:	Organisation: Email:

INDICATORS OF POTENTIAL FORCED LABOUR	EVIDENCE	NO EVIDENCE	DETAILS/REFERENCE
<b>Debt Bondage/Recruitment</b>			
Workers were deceived about the nature of the job, location or employer	<input type="checkbox"/>	<input type="checkbox"/>	
Workers have paid someone during recruitment for the job or work	<input type="checkbox"/>	<input type="checkbox"/>	
Workers cannot leave the job without repaying money owed or other penalty	<input type="checkbox"/>	<input type="checkbox"/>	
Workers are controlled by a landlord or cannot leave accommodation due to financial or other penalty	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Control</b>			
Another person is in control of workers' passport/ID/personal documents	<input type="checkbox"/>	<input type="checkbox"/>	
Another person is in control of workers' bank accounts	<input type="checkbox"/>	<input type="checkbox"/>	
Another person is in control of workers' mobile phones	<input type="checkbox"/>	<input type="checkbox"/>	
Workers act as if or state that they are instructed or controlled by another	<input type="checkbox"/>	<input type="checkbox"/>	
An individual is talking/acting on worker's behalf in a way to cause concern	<input type="checkbox"/>	<input type="checkbox"/>	
Reports/evidence that workers collude in benefit fraud to supplement wages	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Isolation</b>			
Workers' movement during or at end of shift is restricted/controlled	<input type="checkbox"/>	<input type="checkbox"/>	
Workers cannot leave their accommodation of their own free will	<input type="checkbox"/>	<input type="checkbox"/>	
Workers do not possess their own accommodation keys	<input type="checkbox"/>	<input type="checkbox"/>	
Workers are not in control of their own travel to work arrangements	<input type="checkbox"/>	<input type="checkbox"/>	
Workers are unable to speak to family/friends	<input type="checkbox"/>	<input type="checkbox"/>	

Physical signs of violence/intimidation			
Worker(s) reports actual or threats of physical/psychological/sexual violence or intimidation	<input type="checkbox"/>	<input type="checkbox"/>	
There are visible physical expressions of psychological trauma, fear or anxiety	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) reports actual violence or threats made to family/friends/others	<input type="checkbox"/>	<input type="checkbox"/>	
Visible injuries potentially as a result of assault or controlling measures	<input type="checkbox"/>	<input type="checkbox"/>	
Worker(s) appears malnourished, dishevelled, dirty, unsuitably clothed	<input type="checkbox"/>	<input type="checkbox"/>	
Excessive Working			
Workers report that they are expected, coerced or forced to work excessive hours/overtime/days off against wishes	<input type="checkbox"/>	<input type="checkbox"/>	
Workers report that they are threatened, bullied or coerced to do unreasonable work against their wishes	<input type="checkbox"/>	<input type="checkbox"/>	
Personal Records			
Bank accounts identify unrelated workers paid into one account	<input type="checkbox"/>	<input type="checkbox"/>	
There are high occupancy addresses or a common workers' landlord; shared or sequential mobile phones; same next of kin/emergency contact numbers; same place of origin/location in home country; other concerning recruitment/employment data	<input type="checkbox"/>	<input type="checkbox"/>	

INDICATORS OF WORKPLACE EXPLOITATION/MISTREATMENT	EVIDENCE	NO EVIDENCE	DETAILS/REFERENCE
Workers report other criminal human rights violations (e.g. sexual assault or exploitation, workplace bribery, hate crime)	<input type="checkbox"/>	<input type="checkbox"/>	
Workers are paid by cash rather than into a bank account	<input type="checkbox"/>	<input type="checkbox"/>	
There is no clear time worked recording system and/or pay calculation	<input type="checkbox"/>	<input type="checkbox"/>	
There is insufficient evidence that the national minimum wage is paid	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence of use of workers without legal authority to work in the UK	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence of child work and/or child labour	<input type="checkbox"/>	<input type="checkbox"/>	
Access to remedy notices are removed/workers instructed not to inform	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence or indicators of systemic non-payment of holiday pay	<input type="checkbox"/>	<input type="checkbox"/>	
Evidence or indicators of systemic non-payment of statutory benefits	<input type="checkbox"/>	<input type="checkbox"/>	

INDICATORS OF CRIMINAL/SUSPICIOUS TRADING ACTIVITY	EVIDENCE	NO EVIDENCE	DETAILS/REFERENCE
Evidence that work is deceptively subcontracted	<input type="checkbox"/>	<input type="checkbox"/>	
Suspicious activity related to Company Directors	<input type="checkbox"/>	<input type="checkbox"/>	
Suspicious activity related to Company's trading history (e.g. phoenixing)	<input type="checkbox"/>	<input type="checkbox"/>	
Suspicious activity related to payment/reporting of taxes (employee and VAT)	<input type="checkbox"/>	<input type="checkbox"/>	

Additional details regarding Potential Critical Issues:

Supporting information providing background on how the information was gathered:

Where a worker has reported issues, have they consented to provide you with their contact details?

Yes ☐ No ☐ (go to Nationality)

If yes, have they consented for their details to be shared with the Fast Forward Member Brand(s) sourcing from the site?

Yes ☐ (If yes, complete the contact details below) No ☐ (go to Nationality)

Contact name:

Safe contact details – Personal mobile number:

Personal email:

UK current address:

Please detail the safe means of contacting the individual:

Nationality: English spoken: Good / Basic / Minimal / None

Interpreter needed?

Yes ☐ If yes, details of individual/service used: No ☐

#### ACTION TAKEN BY AUDITOR

Advice given to any workers reporting issues (e.g. ACAS, CAB, GLAA, MSH, Police, Salvation Army):

Authority/Body informed: By who: .....	Date	Time	Ref
Gangmasters and Labour Abuse Authority notified (0800 432 0804)			
Police (Non-emergency 101/Emergency 999)			
Modern Slavery Helpline advice sought/notified (08000 121 700)			
Salvation Army advice sought/notified (0300 303 8151)			
Auditor Signature:	Name:		



RESPONSE DECISION AND ACTION (TO BE COMPLETED BY THE BRAND)		DETAILS
Monitor CAP response and re-audit	<input type="checkbox"/>	
Call business owner to formal meeting	<input type="checkbox"/>	
Recommend ending supply relationship	<input type="checkbox"/>	
Notify Police/GLAA	<input type="checkbox"/>	
Decision/Rationale/Other Actions/Comments:		
Internal Notification Dates: Media Team                      Buyers                      Legal		
<b>Authorising Manager Name:</b>		<b>Job title:</b>
<b>Signature:</b>		



# APPENDIX 9

## RETAILER PROTOCOL FOR HANDLING REPORTED CASES OF MODERN SLAVERY IN THE UK SUPPLY CHAIN



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### Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain Advisory Document

#### 1. Purpose and Use

- 1.1. This document establishes principles of good practice and a procedural protocol for retailers in responding to reported cases of forced labour, human trafficking, debt bondage and other forms of modern slavery in their UK supply chain.
- 1.2. The purpose of this protocol is to drive consistent application of good practice in the processes that retailers apply in handling reported cases of modern slavery that occur in their UK supply chain. It establishes a mechanism to incorporate lessons learnt from actual identified cases to develop this good practice and to establish similar processes in other country supply chains.
- 1.3. The status of this document is advisory. BRC recommends that its members and other brands and retailers adopt the principles. BRC invites retailer members to commit to adopting these principles.
- 1.4. The UK supply chain refers to goods for resale and not for resale suppliers, logistics and distribution companies, service providers, contractors, and labour providers at all levels of the supply chain (collectively referred to as 'suppliers'). Relevant retailers, as referred, are those retailers supplied by the particular supplier.
- 1.5. The [BRC](#), [Gangmasters and Labour Abuse Authority](#) (the GLAA) and [Stronger Together](#) have jointly prepared these principles and protocol in collaboration with retailer and supply chain representatives and welcome comment and input to further refine and improve this good practice guidance. BRC will review this guidance at least annually as part of the [BRC Better Retail Better World](#) programme and [GLAA Supplier/Retailer Protocol](#) engagement.

#### 2. Principles

- 2.1. Retailers will recommend that their UK supply chain businesses attain an understanding of how modern slavery occurs in supply chains and an awareness of the indicators of forced labour<sup>1</sup>. Suppliers should also build internal capacity and implement good practice through a due diligence approach to detect, deter and deal with this hidden form of worker exploitation. Retailers will encourage their suppliers to utilise the resources of the GLAA, Ethical Trading Initiative, Stronger Together, trade associations and other training and awareness initiatives to comply with the requirements of the Modern Slavery Act and GLAA licensing standards
- 2.2. Retailers recognise that those who become victims of modern slavery are made vulnerable to exploitation and abuse as a result of poor business practices or through criminal gangs. Individuals may also attempt to place victims into legitimate supply chains and businesses for the purposes of exploitation through forced labour, control of their bank accounts and/or withholding of personal documents.
- 2.3. Retailers will promote to their UK supply chain that where indicators of modern slavery are identified within their business or elsewhere, suppliers should report this to the GLAA via



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<http://www.gla.gov.uk/contact-us/> and/or [Modern Slavery Helpline](#) at the earliest possible stage, for advice on next steps.

- 2.4. Retailers recognise that the safety of the individuals is the first priority. Retailers accept that for suppliers to better protect the safety of individuals and not prejudice inquiries and potential prosecutions, their supply chain will maintain confidentiality over all information relating to the incident until advised by the appropriate authority.
- 2.5. Retailers will only expect their supply chain to inform them about a potential case of modern slavery within their business once authorised to do so by the appropriate UK authority such as the police or GLAA. Suppliers should actively seek approval from the relevant authority to inform their customers about a potential incident.
- 2.6. Where a supplier has alerted their customers; is cooperating with authorities; is actively implementing corrective actions and is not found to be complicit, retailers commit that there will be no standard policy to immediately delist or suspend trade with that supplier because of that specific reason. Instead investigation will take place alongside engagement with the supplier to assess next steps that need to be taken. Retailers will ensure internal coordination to ensure consistency of message and action between all departments such as ethical trade, procurement/buying, legal, PR etc.<sup>2</sup>
- 2.7. If a supplier has not, or is not cooperating with authorities, is failing to implement required corrective actions, or is found to be complicit in the offence, the GLAA will contact the retailers to advise them of the situation. The retailers may then individually decide to take appropriate commercial actions including suspending trade or delisting the supplier.
- 2.8. Suppliers will be encouraged to develop Standard Operating Procedures and Incident Control Procedures for reporting occurrences of modern slavery within their business<sup>3</sup>.
- 2.9. Retailers accept that the GLAA will not exceed its own legal powers or act unlawfully and that it will manage its communications in accordance with its [External Communications Policy](#) and the [GLAA Supplier/Retailer Protocol](#).

### 3. Procedural Protocol

- 3.1. The GLAA will, on request from the supplier within whose business the matter has occurred, issue to that business an email stating that it may now report that matter to its retailer and/or supplier clients. This will include a statement, where appropriate (i.e. unless the company is under investigation for the offence), that the supplier is cooperating fully with the appropriate authorities. If the supplier has been identified as uncooperative the action in 2.7 will be taken instead.
- 3.2. The supplier will determine how it wishes to communicate the matter to its retailer and/or supplier clients. This may vary depending on the facts of the case, but the recommended approach is a single email to all clients to ensure consistency of message and timing. This email should include a summary of facts with the timeline of events as may be released by the supplier.

<sup>2</sup> BRC foresees no competition law issues with this Protocol, however it is the responsibility of each individual company to determine its own legal risk.

<sup>3</sup> Further advice can be found in the Stronger Together [Tackling Modern Slavery in UK Businesses Toolkit](#)



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- 3.3. Following receipt of this email, relevant retailers will aim to collaborate in their response rather than pursuing individual and duplicating activity. Such collaboration may be facilitated by an agreed third party. Alternatively, the relevant retailers will agree and appoint a 'lead retailer' to be the key coordinating point of contact with the supplier, assuming the supplier is willing to disclose its customers.
- 3.4. The objective of collaboration is to reduce duplication of activity and unnecessary burden for the supplier and retailers; promote good practice and efficiency in resolution of issues; provide confidence and assurance, or otherwise, to all relevant retailers that the supplier has the matter in hand.
- 3.5. The supplier should organise calls at the earliest convenience with its representatives, marketing agencies, labour provider (where appropriate), relevant retailers, and GLAA (subject to resources). The supplier may consider joint conference calls to ensure consistency of the information it provides to other organisations. Such calls to include:
  - 3.5.1. Recount of facts and timeline
  - 3.5.2. Supporting facts from GLAA
  - 3.5.3. Questions and discussion
  - 3.5.4. Appointment of 'lead' retailer if not done so already and deemed to be necessary
  - 3.5.5. Agreement on next actions, including media engagement where necessary
  - 3.5.6. On closure of call, email from supplier to confirm above and to contain initial Action Plan or post incident review which highlights gaps in process, root cause and corrective action required by the supplier, labour provider etc.
- 3.6. The 'lead' retailer will:
  - 3.6.1. Coordinate any retailer only conference calls and/or meetings on the matter, promoting appropriate confidentiality with regard to information shared;
  - 3.6.2. Coordinate conference calls and/or meetings on the matter with the supplier and other retailers. These calls would cover if deemed appropriate: actions and information expected from a supplier at what points; organise, including confirmation of funding, and appoint a specialist/auditor to coordinate a social compliance audit/investigation (such audits should not occur whilst the criminal investigation phase is active and only after the GLAA has advised that it is appropriate to do so without risk to the investigation) and to receive and disseminate subsequent reports; provision of support, as may be deemed necessary or helpful for the supplier; discussions on remediation and lessons learned. The lead retailer will not be empowered to make binding decisions creating commercial impacts. Information provided in confidence by the supplier will be treated as such by all parties and will not be shared beyond the relevant retailers, the BRC or the appointed social compliance specialist/auditor without the explicit approval of the supplier.
- 3.7. The BRC will coordinate any media release on behalf of, and in agreement with, the retailers, collaborating with the GLAA, the supplier, retailers and others as may be relevant. Where suppliers lead on media communications, retailers will offer support. BRC and GLAA will appropriately reflect the positive contribution made by suppliers who have identified issues within their business and engaged appropriately with the enforcing authorities.
- 3.8. Any feedback or complaint by a supplier on the application of this protocol may be made either to the lead retailer or to the BRC Sustainability Policy Adviser, as the supplier deems appropriate. A formal response will be provided where one is requested.

# APPENDIX 10

## REMEDATION RECORD

[This template can be modified as required for use to document what remediation has been provided to identified victims of modern slavery and hidden labour exploitation].

CASE INFORMATION	CASE-SPECIFIC RESPONSE
Location of abuse	
Date/s of abuse	
Nature of human rights abuse	
Individuals or organisations responsible for human rights abuses	
Investigation undertaken into the violations	
Date/s of investigation	
Findings of investigation	
PROCESS	
Remediation Policy and Procedure used	
Involvement of suppliers in remedy	
Involvement of local groups/NGOs/charities in remedy	
Involvement of victim's family in remedy	
Involvement of local or national government in remedy	
REMEDICATION OFFERED	
Access to justice offered to victim of abuse	
Remedy requested by victim of abuse	
Proposed remedy offered to victim of abuse	
Actual remedial steps implemented	
Steps taken to rehabilitate the victim	
Steps taken to compensate the victim for the abuses that took place	
Steps taken to satisfy the victim that the abuses will not reoccur	
Steps taken to restore the victim to their original situation before the abuses took place	
Timeframe for remedy	
Other comments	



# APPENDIX 11

## JUST GOOD WORK

Just Good Work is a free mobile app helping all jobseekers and workers understand their employment rights, recognise poor treatment at work and access remedy.

[www.justgood.work](http://www.justgood.work)



### Your pocket guide for working life

- Pay & working hours
- Banking & tax
- Medical & care services
- Living and working conditions
- Taking leave for sickness and holiday
- How Brexit might affect you
- Services that give you help & support
- Report concerns safely & anonymously



**DOWNLOAD FREE**

# GLOSSARY

<b>Advisory, Conciliation and Arbitration Service (ACAS)</b>	An independent public body that provides employees and employers with free, impartial advice on workplace rights, rules and best practice. In addition, ACAS helps to resolve work-related disputes
<b>Agency worker</b>	Workers engaged by a Labour Provider and supplied to a Labour User
<b>Citizens Advice Bureau (CAB)</b>	An organisation that provides members of the public with free advice and information on matters relating to civil law and rights
<b>Charge rate</b>	The financial rate a business charges a client to cover the cost of services
<b>Client(s)</b>	An individual who, or business that, pays for another business's goods or services
<b>Code of conduct</b>	A document setting out expectations of (and rules for) behaviour
<b>Contractor</b>	An external individual or business that undertakes a contract to provide materials, service or do a job
<b>Contractual Terms of Business</b>	A legal contract that governs the terms and conditions of the job
<b>Debt bondage</b>	All work or service that is exacted from any person to pay off a debt
<b>Due diligence</b>	The act of assessing, and working with, another individual or business to control for risk
<b>Ethical Trading Initiative (ETI) Base Code</b>	Internationally recognised code of good labour practice developed by the Ethical Trading Initiative
<b>Forced labour</b>	All work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily
<b>Gangmasters and Labour Abuse Authority (GLAA)</b>	A Non-Departmental Public Body appointed to protect vulnerable and exploited workers. The GLAA investigates suspected cases of labour exploitation in England and Wales and operates a licensing scheme for businesses that provide workers to the fresh produce supply chain and horticulture industry
<b>Health &amp; safety committee</b>	A committee composed of manager and worker representatives to identify and remediate health and safety issues
<b>Hidden third-party exploitation</b>	Exploitation of workers/jobseekers by third-party individuals, businesses or gangs other than the recruiter/employer
<b>Human trafficking</b>	The act of recruiting, transporting, transferring or harbouring of an individual by means of threat or force
<b>Intermediary</b>	Where a business or individual acts as a third party between a recruiter and a worker, e.g. outsourced payroll functions
<b>Investigating Manager</b>	An individual who conducts initial factfinding activity of any suspected workforce issues
<b>Key Information Document</b>	A document provided to agency workers that provides information about their pay and terms of engagement, including any deductions and fees. This document must be provided before agency workers agree to their terms and conditions of engagement
<b>Labour broker</b>	Introduces jobseekers to a recruiting business. Could be a relative, neighbour or local broker known in the community. May be known or unknown to the recruiter, and if known, is typically engaged through an informal relationship
<b>Labour provider</b>	A business responsible for recruiting workers and supplying them on a temporary basis to an end client
<b>Labour provider sub-agent</b>	Any third party used by a Labour Provider to help facilitate the recruitment, selection, hiring and/or transportation of workers
<b>Labour User</b>	A business that employs or uses workers sourced or supplied by a Labour Provider/Recruiter
<b>Management system</b>	How a business consistently meets the standards, requirements and objectives it has committed to, using repeated steps
<b>Migrant worker</b>	An individual who is (or will be/has been) engaged/employed in a State of which they are not a national
<b>Modern slavery</b>	An umbrella term used to describe offences of slavery, servitude, forced or compulsory labour and human trafficking

<b>Modern Slavery Champion</b>	An individual who supports the business to raise awareness of modern slavery within the general workforce and local community
<b>Modern Slavery Lead</b>	An individual who leads the implementation of the Tackling Modern Slavery programme for an operational site or business
<b>National Crime Agency</b>	The lead national law enforcement agency in the United Kingdom tackling organised crime
<b>National Referral Mechanism</b>	The UK's framework for identifying victims of human trafficking or modern slavery, and ensuring they receive the appropriate support
<b>NGO</b>	Non-Governmental Organisation – a non-profit organisation that operates independently of any government, typically one whose purpose is to address a social or political issue
<b>People smuggling</b>	The illegal movement of an individual to a State Party of which they are not a national or a permanent resident, for a financial or other material benefit
<b>Policy</b>	A document that sets out your business's written commitment to meet specific standards/take specific action(s)
<b>Procedure</b>	A document that details the activities and decisions required to deliver your business's commitments
<b>Process</b>	An overview of the activities and decisions required to deliver your business's commitments
<b>Recruiter</b>	An individual or business who sources workers for employment by another business
<b>Recruitment fee</b>	A fee charged to jobseekers to cover the cost of the recruitment process
<b>Recruitment intermediary</b>	Offers recruitment services for a Labour Provider. There may be several Recruitment Intermediaries in a labour supply chain
<b>Recruitment sub-agent</b>	Any third party used by a Recruiter to help to facilitate the recruitment, selection, hiring and/or transportation of workers
<b>Remedy</b>	The means to recover a right or obtain redress for issues
<b>Risk assessment</b>	A system to assess the impact and likelihood of potential risks and the risk rating levels
<b>Salvation Army</b>	A registered charity that provides specialist support for all adult victims of modern slavery in England and Wales
<b>Service-Level Agreement</b>	Not a legal document. Details the operational processes and agreed service levels and assigned responsibilities between two parties for the recruitment, supply and management of workers
<b>Stakeholder</b>	An individual or business with interest or concern in your business activity
<b>Sub-contracted Labour Provider</b>	A Labour Provider sub-contracted by another Labour Provider to supply workers directly to a Labour User, where they cannot meet the supply requirements directly or the business model is set up to supply jobseekers/workers through sub-contractor Labour Providers
<b>Trade union(s)</b>	Organisations made up of members (mainly workers) within a trade, group of trades or profession, formed to protect and further workers' rights and collective interests
<b>Training needs assessment</b>	A document that assesses and identifies the training and development needs of individuals
<b>Welfare Officer</b>	An individual appointed to provide initial comfort and emotional support for a worker impacted by a workforce incident, modern slavery or hidden labour exploitation
<b>Worker Assignment Details</b>	A form issued to workers setting out the details of each assignment
<b>Worker Handbook</b>	A document provided to workers detailing employment and job-related information, including policies, procedures and behavioural expectations
<b>Workforce Incident Management Team</b>	A team appointed to respond to serious workforce issues during any hours of operation

# FREE RESOURCES

TO DOWNLOAD FROM [WWW.STRONGER2GETHER.ORG](http://WWW.STRONGER2GETHER.ORG)

## TOOLKITS

- Tackling Modern Slavery in Business – UK version
- Tackling Modern Slavery in Construction – UK version
- Tackling Modern Slavery in Global Supply Chains – UK version
- Tackling Forced Labour in Business – Global version
- Tackling Forced Labour in Agri-Business – South Africa

## VIDEOS

- Multilanguage subtitles available
- ‘Daniel and Weronika’s Story’ – UK manufacturing and agriculture
- Concrete – UK construction and fit out
- Eyes Wide Open – South African horticulture

## WORKPLACE RESOURCES

- Multilanguage workplace posters
- Multilanguage UK worker leaflet – ‘Help Reduce Exploitation’
- Multilanguage UK worker leaflet – ‘Private Home Rental Guidance’
- Worker Induction Presentation – PowerPoint slides for use in inductions and training
- Employer and Labour Provider interactive Good Practice Checklists
- Template policy on tackling Modern Slavery and hidden labour exploitation
- Template recruiter compliance principles
- Multilanguage template worker questionnaire
- Sample worker interview questions
- Critical Issues Report
- Remediation Record

## TRAINING

- Online e-learning: “Tackling Modern Slavery in the UK” modules
- In-house “Tackling Modern Slavery” training by specialist trainers for workers, managers, supply chains – may be provided on demand.
- Open interactive training workshops delivered both online and face-to-face, including ‘Advanced Tackling Modern Slavery in UK Businesses’ and ‘Investigative Interviewing Skills in the Workplace’

# NOTES



tackling modern slavery in supply chains

**We are Stronger Together** – a multi-stakeholder not-for-profit collaborative initiative supporting organisations in all sectors to address modern slavery risks within their business and supply chains.

**We use** an internationally proven collaborative methodology, engaging stakeholders on a country-by-country, sector-by-sector basis within the framework of the UN Guiding Principles on Business and Human Rights.

**Our Vision** is for supply chains free from modern slavery.

**Our Mission** is to work together to reduce forced labour, labour trafficking and other hidden third-party labour exploitation of workers in supply chains.

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