

UNDER CONSTRUCTION UNDER CONSTRUCTION UNDER CONSTRUCTION

stronger together

tackling modern slavery in supply chains

A Toolkit for Tackling Modern Slavery
in the Construction Sector

February 2017

stronger2gether.org
in association with



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STRONGER TOGETHER

Stronger Together is a business led, multi-stakeholder collaborative initiative whose purpose is to support organisations to tackle modern slavery within their businesses and supply chains.

Stronger Together offers clear guidance and pragmatic resources to support employers and labour providers in at risk sectors to deter, detect and deal appropriately with forced labour, labour trafficking and other hidden labour exploitation.

The Stronger Together website offers:

- Free to download good practice guidance and resources
- A range of training materials and capacity building solutions tackling modern slavery in businesses and supply chains including open workshops, online training modules and bespoke in-house training
- A platform for businesses to publicly demonstrate their commitment to tackling hidden labour exploitation and sharing best practice.

The infographic on the inside back cover provides an overview with links to our resources and services.

Stronger Together takes a collaborative approach to developing new strategies to support business in addressing modern slavery risks based on the corporate responsibility to respect human rights within the UN Guiding Principles on Business and Human Rights.

THE CHARTERED INSTITUTE OF BUILDING

The CIOB is the world's largest and most influential professional body for construction management and leadership.

The CIOB has a Royal Charter to promote the science and practice of building and construction for the benefit of society, and has been doing that since 1834. Its members work worldwide in the development, conservation and improvement of the built environment.

The CIOB accredits university degrees, educational courses and training. Its professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

All members are required to observe the CIOB Code of Conduct and to act to the highest ethical and professional standards at all times.

The Institute actively campaigns for the eradication of modern slavery in the global built environment sector and has published two reports: *The Dark Side of Construction* (2015) and *Building a Fairer System: Tackling Modern Slavery in Construction Supply Chains* (2016).

For more information on the CIOB visit: www.ciob.org.

**Stronger Together and the CIOB will be providing training solutions as part of the "Tackling Modern Slavery in the Construction Sector" programme.
For more info visit www.stronger2gether.org.**

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Users should not feel bound to read the toolkit from cover to cover but rather, dip in and out of the most relevant section(s) based on their needs and level of awareness of the issue.

SECTION D: APPENDICES

The appendices include information on all elements of Stronger Together's Construction Programme on preventing and tackling modern slavery. It also signposts many useful templates and guidance materials that address modern slavery or business-related human rights issues, and can be used to raise awareness and capacity-building. The templates can be adapted and modified to suit your business' or supply chains' needs.

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SECTION A

INTRODUCTION AND CONTEXT

“ Modern slavery is the great human rights issue of our time. ”

UK Prime Minister Theresa May, 31 July 2016

More people are trapped in modern slavery today than at any other time in history. The 2016 Global Slavery Index estimates that 45.8 million people are in some form of slavery in 167 countries.

Modern slavery is present in developing and developed economies. With strong links to corruption, people trafficking and organised crime, forced labour generates an estimated US\$150 billion in illegal profits annually. Little wonder that UK Prime Minister Theresa May has called modern slavery “the great human rights issue of our time.”

Although no respectable business would choose to be associated with exploitation, human rights abuses often infiltrate and remain hidden in supply chains. This includes the construction sector, from raw materials production to manufacturing and site labour.

Over the past decade, forward-looking organisations have started to seek out human rights abuses in their operations, joining industry support groups, aligning their strategy to the UN Guiding Principles and reporting on their progress. Now, new legislation, including the California Transparency in Supply Chains Act (2010) and the UK Modern Slavery Act (2015), is forcing a far greater number of companies to re-evaluate their business models.

In the UK, organisations with a turnover of more than £36 million are required to report annually on what actions they are taking to fight slavery and human trafficking in their supply chains. This encompasses any activities carried out overseas and it includes multinationals with UK-based divisions.

The effects of the Modern Slavery Act are already being felt internationally and are being closely monitored in other jurisdictions. It is likely that this model will be replicated in other countries over the long term.

We are at the beginning of a long, slow journey. Slavery will take a long-term commitment to eradicate. The challenge for construction organisations – as with other industries - is how to ensure that policies set at board level can be sustainably and effectively translated into day to day business operations.

Like all chartered organisations, CIOB believes that ethical and responsible behaviour is a core value and a fundamental requirement for any professional working in the industry. Acting on ethical principles sometimes means that it is necessary to do more than comply with local laws.

Whilst most employees would be horrified to think that they might be unwittingly allowing worker exploitation to flourish, many are not currently equipped with enough knowledge to spot the signs and to take the most appropriate action to protect victims when concerns are raised.

Moreover, slavery is so endemic and deep-rooted, individuals will not have much impact if they act alone. Measures to prevent and tackle modern slavery need to be understood and embedded across operations. In-depth engagement with suppliers is also essential.

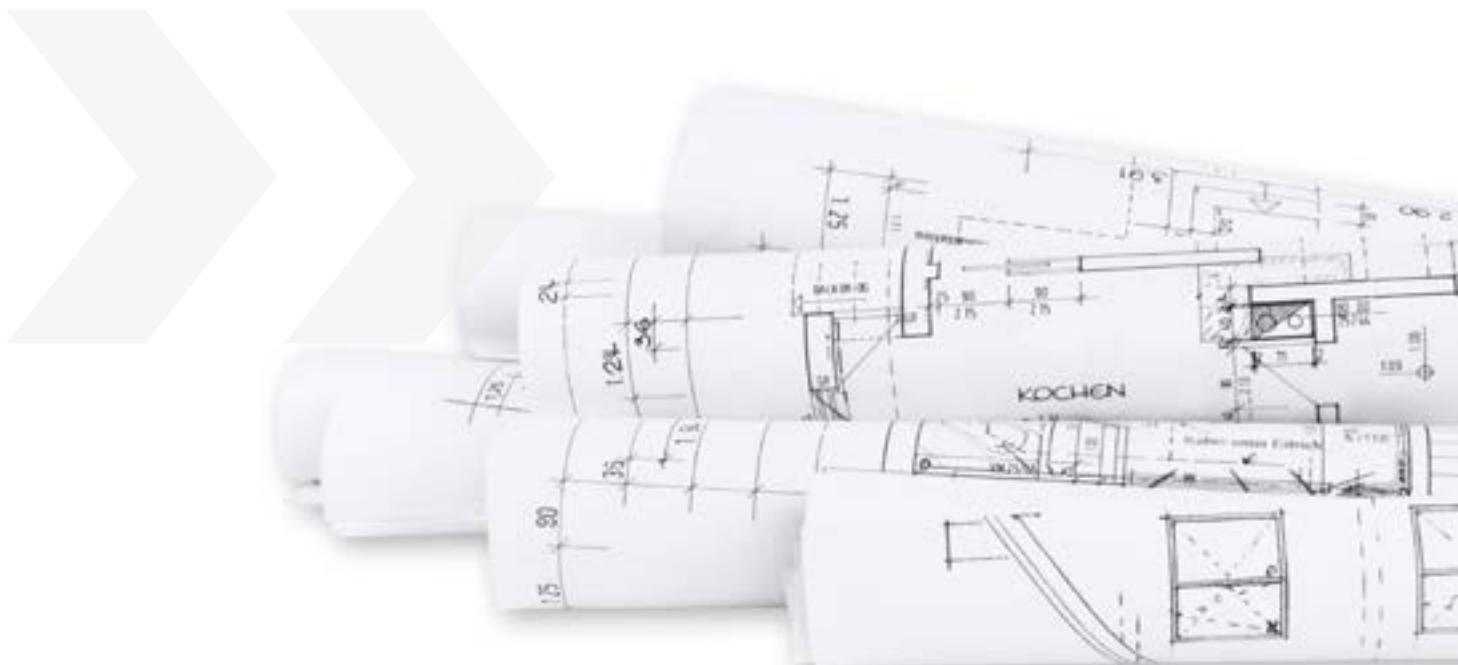
Widespread training, both to raise awareness of human rights abuses and to increase the knowledge and skills of the workforce, will play a vital role in driving organisational change.

This is why CIOB and Stronger Together, a collaborative multi-stakeholder initiative that already has a successful track record in the retail sector, are joining up. Leading brands, including Aldi, Asda, Co-operative Food, Lidl, Marks & Spencer, Morrisons, Sainsbury's, Tesco and Waitrose, are already part of the Stronger Together collaborative initiative to reduce the risk of modern slavery within their operations and supply chains.

This toolkit for the construction industry sets out a comprehensive action plan for clients, contractors, suppliers and labour agencies working in the construction sector, it aims to:

- Raise awareness of modern slavery among all levels of employees
- Act as a reference for common signs and patterns that indicate exploitation
- Provide an action plan for when labour exploitation is discovered, including guidance on protecting victims
- Set out pragmatic steps that can be reported in annual slavery and human trafficking statements
- Help organisations demonstrate to investors, shareholders, employees, clients and NGOs the measures that they are taking to identify and mitigate the risks of modern slavery in their operations and supply chains.

Modern slavery is everyone's problem. Collaborative action, engaging with suppliers and educating employees will not solve this complex issue overnight, but it can set organisations on a more sustainable path towards effecting change and improving construction's reputation globally.



THE PURPOSE OF THIS TOOLKIT

This toolkit provides guidance and good practice for responsible employers and labour providers operating in the construction industry. Its aim is to help you develop a robust strategy to prevent, uncover and report modern slavery, particularly forced labour and human trafficking, which may be occurring within any part of your own business or supply chains.

This can include, but is not limited to:

- Your own workforce and project sites
- Subcontracted organisations providing staffed services to your business and/or sites
- Labour providers within your immediate labour supply chain.

This toolkit will provide practical guidance for staff in:

- HR and those responsible for tackling modern slavery within your business
- Procurement, operations and technical, sustainability/Corporate Responsibility department, social compliance and risk management teams that are responsible for formulating and implementing corporate strategies to address adverse human rights risks across the whole supply chain.

The toolkit has been created for every construction business. There is no geographic or size limitation - organisations could be minor operations with just two to three people up to large multinationals.

By implementing the Stronger Together good practice in this toolkit, your business will be able to:

- Pursue some of the necessary pragmatic steps to help develop an annual slavery and human trafficking statement required under the S54 Transparency in Supply Chains provisions of the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act (California Civil Code section 1714.43) and other legal requirements addressing modern slavery and human trafficking in national operations and global supply chains that may be introduced
- Show investors, shareholders, employees, clients, non-governmental organisations (NGOs) and other stakeholders that your organisation has taken proactive measures to identify and mitigate the risks of slavery and human trafficking in your operations and supply chains
- Display a positive engagement, working with employee representatives and workforces to protect them from and prevent exploitation
- Demonstrate a commitment to working with others to implement remedial steps should any instances of slavery or trafficking be identified.

To supplement the information in this toolkit, additional Stronger Together information and resources are available at www.stronger2gether.org. CIOB policy reports: *Modern Slavery: The Dark Side of Construction and Building A Fairer System: Tackling Modern Slavery In Construction Supply Chains* can be found at <https://policy.ciob.org/research/>.

THREE

THE ROLE OF RESPONSIBLE BUSINESS IN TACKLING MODERN SLAVERY

The construction sector is heavily reliant on outsourcing and subcontracting. Its complex and fragmented supply chains often have to operate to strict timeframes. But delays, technical issues and logistical problems all add pressure to the schedule, forcing delivery teams to work to rapid turnaround times. It is an environment that, if not properly managed, can leave workers vulnerable to exploitative practices, including long working hours and forced overtime.

The construction industry is at particular risk of modern slavery. This is due to its labour intensive nature and high proportion of low or unskilled migrant workers employed through third party recruitment organisations.

The risk of worker exploitation increases exponentially, depending on the number of subcontractors on a project, and the amount of intermediaries that are involved.

Responsible businesses put tackling the most extreme forms of labour exploitation at the heart of their business and human rights strategies.

YOUR BUSINESS NEEDS TO TAKE RESPONSIBILITY FOR TACKLING MODERN SLAVERY FOR A NUMBER OF REASONS:

LEGAL COMPLIANCE

Forced labour and human trafficking are punishable as crimes in most countries around the world and businesses involved in such activities could face prosecution.

Under national and state legislation such as the UK Modern Slavery Act 2015 and the California Transparency in Supply Chain Act 2010 and similar legislation being developed in a number of other countries, certain businesses are required to undertake due diligence and practical steps to ensure there are no incidences of slavery or human trafficking in their business operations.

The vast majority of International Labour Organization (ILO) member states have ratified Conventions 29 and 105 on forced or compulsory labour and the Palermo Protocol against human trafficking. In 2014, the ILO added a new Protocol to the existing ILO Convention 29 on Forced Labour from 1930. This Protocol sets legal requirements for states, which include taking steps and applying due diligence in both the public and private sectors to prevent and respond to risks of forced labour, providing victims with protection and access to effective remedies.¹

MANAGING RISK AND REPUTATION

Organisations' reputations and legal status are put at serious risk by allegations of forced labour and trafficking. Construction companies of any size can take steps to mitigate the risks of modern slavery within their own sites and operations, as well as in their supply chains. This includes internal measures as well as joint, industry-wide action. Businesses face new and growing expectations that their practice will comply with social and human rights criteria, especially in high-risk industries such as construction. Businesses that show leadership in this area not only mitigate negative exposure and damage but can also enhance their reputations.

FOUR

¹ International Labour Organization, P029 - Protocol of 2014 to the Forced Labour Convention, 1930. Available at: www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:P029

TRADE AND INVESTMENT RISK

In some countries, trade regulations prohibit the import of goods produced by forced or trafficked labour. In these jurisdictions, such allegations can result in the confiscation of imported goods by public authorities or disruption to trade and production schedules. Allegations of forced labour and trafficking can also significantly threaten investor relations and jeopardize access to public funds such as export credits.

COMMITMENT TO UN SUSTAINABLE DEVELOPMENT GOALS²



In September 2015, all UN member states agreed a set of global goals - the Sustainable Development Goals (SDGs) - to guide development policy worldwide until 2030.

Businesses should each take ownership 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" (Goal 8.7).

In recognition of the magnitude and complex nature of this challenge, the ILO called for the creation of a multi-stakeholder "Alliance 8.7". This alliance of actors (state, civil society, academic, media, UN agencies), convened in 2016, has been charged with assisting in the elimination of forced and child labour - the achievement of SDG 8.7 - through such actions as:

- Co-ordination of action at the global, regional and country level
- Campaigns and powerful advocacy to increase global awareness
- More effective policies and action plans
- Better monitoring and knowledge sharing

The level of risk of forced labour that your business faces depends on many factors, including where you operate, who your business partners are and the transparency of your supply chain and business operations.

The independent international organisation, Global Reporting Initiative (GRI) provides useful resources outlining how your company can approach and support the SDGs: www.globalreporting.org/information/policy/Pages/SDGs.aspx.

This toolkit provides one of the building blocks for businesses in developing a robust strategy and plan of action for preventing and responding to hidden labour exploitation.

² United Nations, Sustainable Development Goals. Available at: <https://sustainabledevelopment.un.org/sdgs>

WHAT IS MODERN SLAVERY

Stronger Together supports businesses in tackling the most extreme forms of labour exploitation, including:

Modern slavery³ - this is a broad term used to encompass the offences of slavery, servitude and forced or compulsory labour and human trafficking. The term extends to slavery-like practices such as debt bondage, sale or exploitation of children and forced or servile marriage. While varied in nature, all involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.⁴

Forced labour⁵ - refers to any kind of work or service that someone is undertaking under menace of penalty, for which they have not offered themselves voluntarily. People are in a forced labour situation if they enter work or service against their free will and cannot leave it without penalty or the threat of penalty. This does not have to be physical punishment or constraint. It can also take other forms, such as the loss of rights or privileges, retention of identity papers or the threat of being reported to immigration authorities.

Trafficking in persons⁶ - trafficking in persons, or human trafficking, can lead to forced labour or slavery. This 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."

When trafficking leads to forced labour, people are tricked and deceived or coerced into travelling to a job that either never existed or, if it did, the terms and conditions were not as stated. It is important to note that:

- The victim may consent to the travel, for example in cases where they are deceived by the promise of a better life or job or where a child is influenced to travel by an adult
- Travel need not be cross border but may be within country
- 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.

Bonded labour - also known as debt-induced forced labour and debt bondage. This involves the taking of a loan or an advance of wages by a worker from an employer or labour recruiter in return for which the worker pledges his or her labour and sometimes that of family members to pay back the loan. Debts may be passed onto the next generation.

³ Office of the United Nations High Commissioner for Human Rights, *Abolishing Slavery and its Contemporary Forms*, 2002. Available at: www.ohchr.org/Documents/Publications/slaveryen.pdf

⁴ For a model definition of terms, see Article 5. UNODC Model Law against Trafficking in Persons

⁵ International Labour Organisation, *Combating Forced Labour, A Handbook for Employers and Business*, 2015, definition from ILO Convention No. 29 (1930). Available at: www.ilo.org/wcmsp5/groups/public/-ed_norm/-declaration/documents/publication/wcms_101171.pdf

⁶ Defined in the United Nations Convention against Transnational Organized Crime Protocol to Prevent, Suppress and Punish Trafficking in Persons Article 3, paragraph (a).

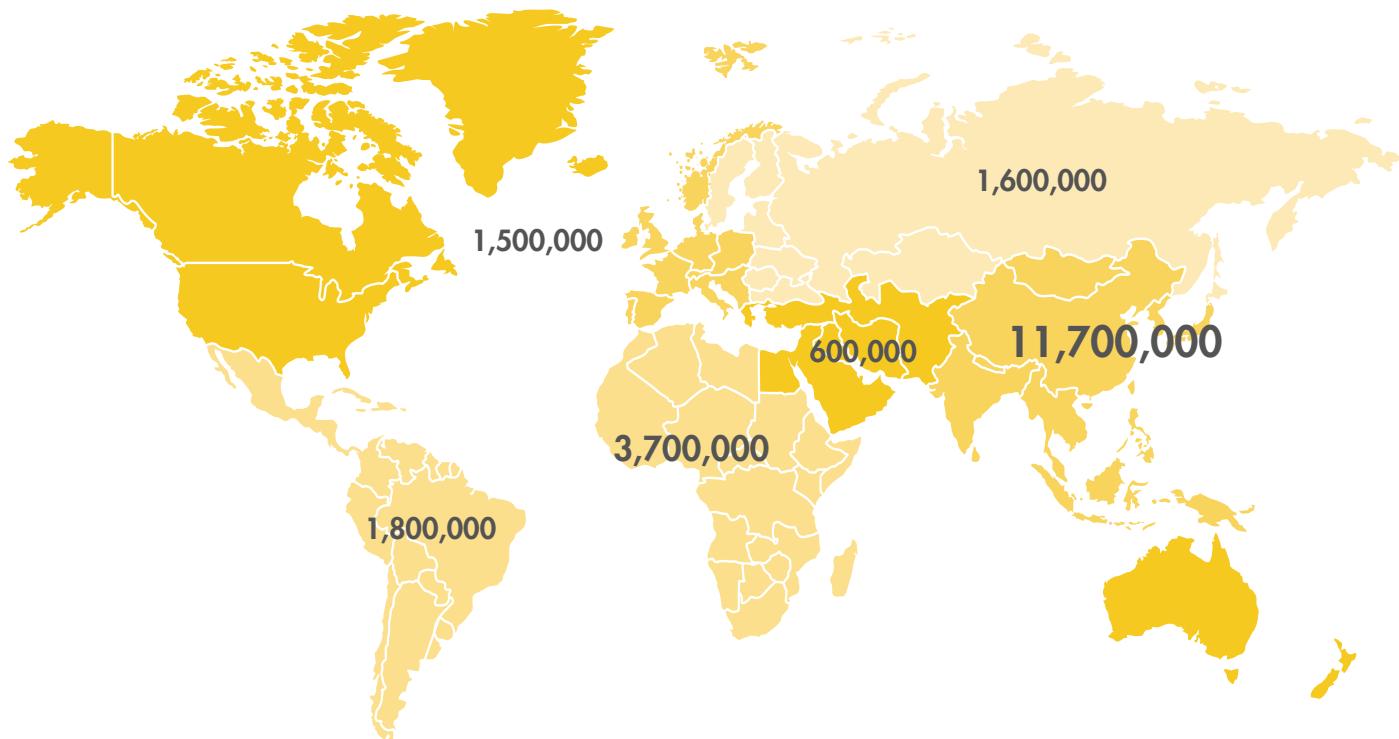
THE SCALE OF MODERN SLAVERY

Human trafficking is the fastest growing criminal industry in the world, second in profitability only to the drugs trade. Organised criminality has identified that the exploitation of workers provides a lucrative business opportunity. As the construction sector employs 7% of the global workforce⁷ it has a responsibility to consider these risks.

The 2016 Global Slavery Index estimates that **45.8 million men, women and children around the world are trapped in modern slavery in 167 countries**, whether through human trafficking, forced labour, debt bondage, forced or servile marriage or commercial sexual exploitation.⁸

The ILO reports that **trafficking in persons has an annual trade value of around US\$150 billion**.⁹ Two thirds or US\$99 billion of this trade is commercial sexual exploitation, while a further US\$51 billion is the result of forced economic exploitation. It is estimated that exploitation in the construction, manufacturing, mining and utilities industries generates US\$34 billion (23%) annually.¹⁰

The ILO estimates that there are **20.9 million people in forced labour globally**.¹¹ This includes 14.2 million in private economy sectors such as construction, manufacturing, mining, utilities, agriculture, forestry, fishing and domestic work.



In a 2015 research report by the European Union, construction was number two on the list of economic sectors in the EU most prone to labour exploitation. Of the 21 countries that participated in the research, nine identified the construction sector as having the highest risk of labour exploitation. The combination of strong structural risks of forced labour in construction supply chains together with the fact the industry employs an estimated 7% of the global workforce, means that it is likely thousands of construction workers are subject to misery and injustice across the world.

⁷ Building and Wood Worker's International. Building and construction. Available at: www.bwint.org/default.asp?Issue=CONSTR&Language=EN.

⁸ Global Slavery Index, 2016. Available at: www.globalslaveryindex.org/findings/

⁹ www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_243201/lang--en/index.htm

¹⁰ International Labour Organization, 2014. ILO says forced labour generates annual profits of US\$ 150 billion. Available at: www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_243201/lang--en/index.htm

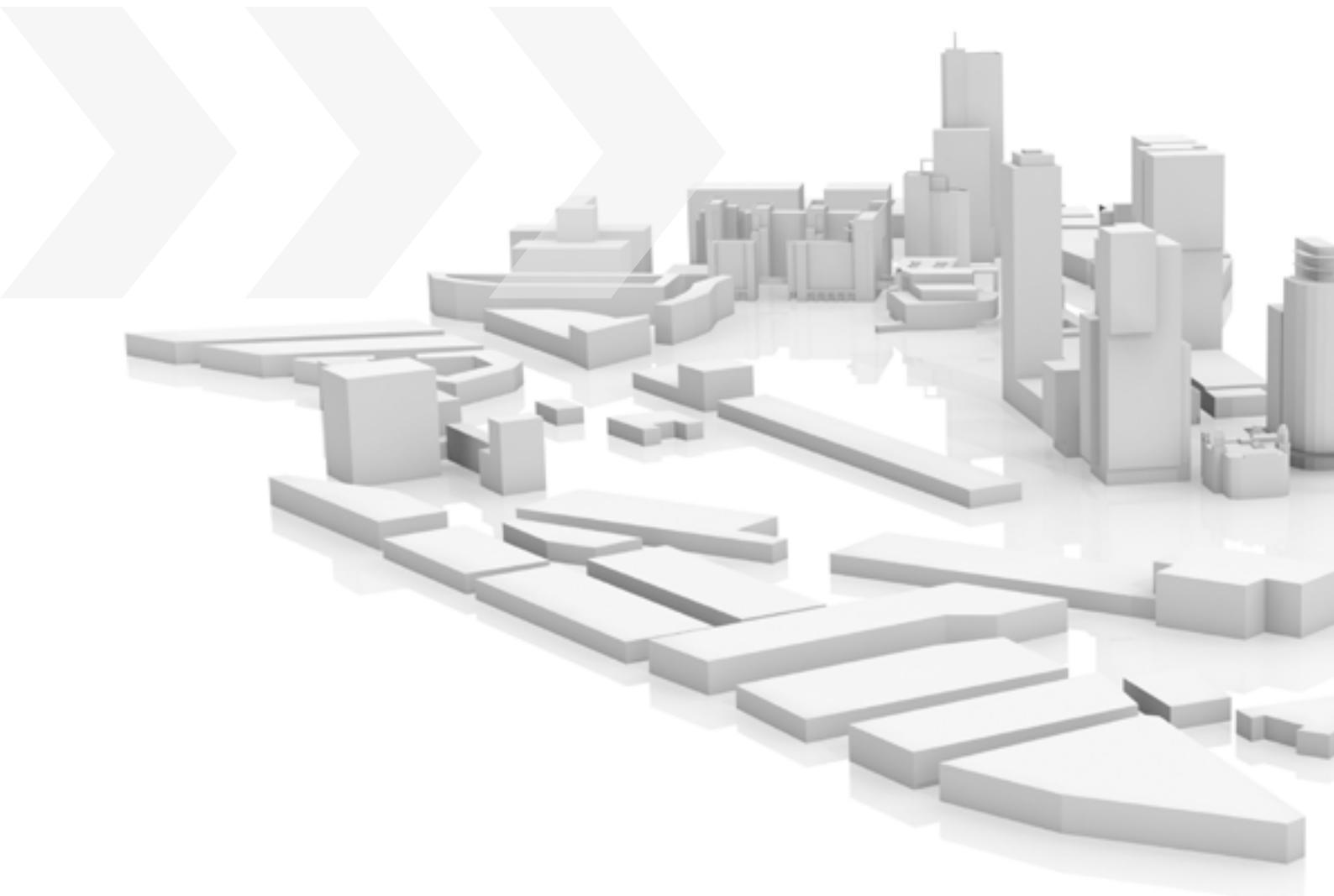
¹¹ International Labour Organization, 2012. New ILO global estimate of forced labour: 20.9 million victims. Available at: www.ilo.org/global/topics/forced-labour/news/WCMS_182109/lang--en/index.htm

Awareness of modern slavery in the construction industry appears to be growing, as does scrutiny of the sector. In 2015, the CIOB published a report entitled ***Modern Slavery: The Dark Side of Construction***. This report details the prevalence of human rights abuses in the sector globally, including bonded labour, delayed wages, abysmal working and living conditions, withholding of passports and limitations of movement.

In 2016 a further report, ***Hidden in Plain Site – Modern Slavery in the Construction Industry***, was published¹². The report analyses articles from more than 6,000 licensed news sources in more than 100 countries across the globe between January 2015 and May 2016. It concludes that throughout the global construction industry and its material supply chains, modern slavery is common, concealed and subject to inadequate prevention, policing and prosecution. The report highlights the brick sector as being a hot spot in terms of forced and child labour, and includes information from the labour rights organisation Verité.

Verité criticises the brick sector for promoting bonded labour and debt bondage, and states that bricks from 21 countries are produced using forced or child labour, including China and India, two of the top three brick exporting countries.

Further case studies in the report include allegations of forced labour being used to build World Cup 2022 stadiums in Qatar, a marine construction project in the USA, and Brazilian workers at an industrial plant in Angola. The report also cites the ILO estimation that of the US\$150bn profit generated annually by forced economic exploitation around the world, US\$34bn (23%) comes from the construction, manufacturing, mining and utilities industries.



¹² LexisNexis, 2016. *Hidden in plain site*. Available at: bisinfo.lexisnexis.co.uk/inplainsite_modernslaveryconstruction_report

WHAT ARE THE MODELS OF FORCED LABOUR IN SUPPLY CHAINS?

There are four overarching models of forced labour:

STATE SPONSORED OR CONTROLLED

In some countries certain forms of slavery are legal. For example, in Vietnam, prison labour is encouraged. In the Gulf region, many Arab nations use the traditional Kafala system, whereby migrant employees are effectively "owned" by employers, and must ask their permission to change jobs or leave the country. As employers typically retain migrants' passports and hold a disproportionate amount of power over their workers, this practice is easily open to abuse.

EMPLOYER CONTROLLED

An employer who knowingly holds workers in forced labour and/or applies conditions that have the effect of creating forced labour such as debt bondage, retention of wages, penalties, exceptionally low wages and excessive hours. Employers may outsource work to illegal or uncontrolled sub-contractors or engage workers through a labour supplier at prices that can only be achieved through worker exploitation.

RECRUITMENT INTERMEDIARY CONTROLLED

Sourcing agents, labour brokers or any person providing labour can abuse their position in a variety of ways. This includes: charging recruitment fees, contract switching, debt bondage or retention of wages. They could also impose penalties that have the effect of holding workers in a forced labour situation. The employer may be complicit, negligent, naïve or genuinely duped by convincing and manipulative intermediaries.

GANG/EXPLOITER CONTROLLED

Organised criminal gangs and exploitative individuals "recruit" workers and force them to work for legitimate employers and labour providers. The end user businesses may not be aware that the workers are being controlled, although there may be rogue individuals – supervisors or consultants - within the organisation that are complicit in the deception.

The gang/exploiter controlled model is one of the most prevalent models of modern slavery. Most employers and labour providers do not recognise the signs of third party labour exploitation within their business or know how to deal with it once uncovered. In addition, they may be unwittingly and ambivalently using recruitment or supervisory models that permit exploitation to flourish.

HOW DO EXPLOITERS CONTROL AND EXPLOIT THEIR VICTIMS?

Exploiters and gangs use well practised methods to find, subdue, hold, break, control and maximise the economic return from modern slavery victims, making the means of escape or discovery extremely difficult.

Established practices that exploiters and gangs could use include:

- Quickly managing them into financial indebtedness so that they have to work to pay off money owed for such items as transport, rent and food
- Actual and threatened psychological and physical violence, harassment and intimidation to repay money owed
- Threats of violence against the worker's closest family members 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
- Controlling their finances. Holding victim's bank cards and withdrawing wages, forcing them into overdraft, taking out loans or items on hire purchase in the victim's name.
- Withholding the person's passport and other identification documents and using their identity to commit benefit and financial fraud
- Threatening to expose the worker to the authorities for a variety of reasons including, 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
- Isolating the 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.

Victims may be inhibited or unable to make a formal complaint and act as a witness against their exploiters due to:

- Fear of retribution
- Being psychologically damaged by their abuser
- 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 difficult to identify and attribute
- Distrust or fear of state authority
- Fear of deportation
- Self-blame and shame regarding their situation
- Being used to poor living and working conditions
- Acceptance of the situation as better than nothing
- Hope that things will get better
- The various ways in which exploiters subdue, hold, control and maximise the economic return from the 'workers' they hold in modern slavery, making it extremely difficult for victims to escape

HOW DOES THIRD PARTY EXPLOITATION HAPPEN IN PRACTICE?

Hidden third party labour exploitation occurs within all types of business, including decent and responsible organisations. In addition, certain types of recruitment, labour supply or supervisory model make it easier for exploitation to flourish.

The exploiters hold a position of power over their victims and abuse this for personal gain. It is well hidden and the victims are reluctant or too frightened to come forward.

Employers and labour providers often do not recognise the signs of third party labour exploitation occurring within their business or know how to deal with it once uncovered.

This toolkit and the additional Stronger Together resources support employers and labour providers to be aware of these risks and how to address them.

Hidden third party models of labour exploitation include:

- **Work finding exploitation:** A labour sourcing agent who offers workers to a labour provider or employers “free of charge” which inevitably results in the worker paying a fee. Alternatively, this could involve someone acting informally as a work-finding agent who charges the worker for this service. They may pose as a relative, friend or helpful interpreter.
- **In work exploitation:** A recruitment consultant who charges workers a one-off recruitment or ongoing placement fee without the knowledge of the labour provider management.
- **Accommodation based exploitation:** An employer supervisor who, without the knowledge of management, selects workers on the basis that they use his sublet accommodation; or a landlord holding workers in debt bondage and controlling their bank accounts.
- **Organised criminal gangs and exploiters:** An organised gang that traffics workers and holds them in forced labour.

These models of hidden third party labour exploitation are explained in more detail on the following pages.

WORK FINDING EXPLOITATION

At its most informal, this could be an entrepreneurial individual described as a “friend” of the migrant worker or workers. At a more organised level, it could involve established labour sourcing agencies, often based in the countries where workers are sourced.

Whatever the setup, the most common exploitation models involve variations on the following:

- **The “helpful” entrepreneur:** Usually speaks good English/the local language and is well connected in a local migrant community. May position themselves as a friend, relative or Good Samaritan looking to help migrants find work. May escort them to the labour provider and/or place of employment. Often acts as an interpreter.

He or she may start doing this as a favour, latterly spotting an opportunity to earn a bit of money providing this service. Although the intention could be completely benign to begin with, there is a risk that the situation could become more exploitative with the growing opportunity to earn increasing sums of money. Workers may experience varying levels of coercion, force and intimidation.

The fact is, by introducing workers, this person is operating in the capacity of employment agent or gangmaster and is consequently subject to the relevant UK legislation. In cases where the labour provider or employer are aware of these actions, they are also subject to the relevant legislation.

- **The “piggy back” scam:** An individual copies an employer’s or labour provider’s logo from their website and mocks up job adverts and offer letters passing themselves off as part of a legitimate business. The fraudster posts bogus adverts on classified advertisements websites and elsewhere. Victims are dealt with remotely by phone and email but do not actually meet the scammer. They will be tricked into paying fees up front for work finding services, transport and related costs.

Jobseekers have usually received only flimsy promises of work, but are told to report to the targeted employer or labour provider at a particular date and time. They will have been intentionally given poor or misleading information about the location or nature of the job. On arrival, workers discover that there is no work available, and that the company has no knowledge of the “supplier” the workers had been dealing with.

A variation on this scam is that workers pay fees in their home country and are told to meet someone at a key location such as a coach station. There, they receive further information, and are asked to pay additional fees. On arrival at the place of work, the employer says he was not expecting them and has no work of the type they were promised. However, workers are offered a different type of work for lower wages. The workers feel that they have no choice but to accept these unfair conditions. In such cases, the employer may actually be colluding with the other exploiters.

- **Charging recruitment fees:** A labour provider or employer may use the services of a labour sourcing agency to source or supply workers. Migrant workers are usually sourced from their home countries, but can sometimes come from local migrant communities in the same country.

Recruitment fees should be a business cost, not a cost for the jobseeker. Where a labour provider or employer uses the service of a labour sourcing agency, sufficient fees should be paid to the agency for there to be a sustainable business model.

ILO Convention 181 Article 7 (1) states that private employment agencies shall not charge directly or indirectly, in whole or in part, any fees or costs to workers or jobseekers. Thirty two countries have ratified the Convention.

In September 2016, the Tripartite Technical Meeting of Experts to Develop Guidance on Fair Recruitment held at the ILO in Geneva adopted the General Principles and Operational Guidelines on Recruitment. The Principles and Guidelines include a breakthrough principle that “no recruitment fee or other costs should be charged to workers and job-seekers”. The principle applies to all workers without discrimination or exemption, applies to all workers, whether low skilled or highly skilled, in the private or public sectors. This is a step further than what is stipulated in the ILO Convention 181.

- **Hidden charges:** Alternatively or additionally, jobseekers may be forced to pay for services that are overpriced, unnecessary, for which there is no real choice, or are entirely fictitious.

Some chargeable services may be described as optional, but are so integral to the work-finding process that they are in fact a work-finding charge. This could include: providing information, advice and guidance on job vacancies; checking documentation required as part of the recruitment process; interview and assessment fees; completing recruitment-related paperwork; 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:

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

IN WORK EXPLOITATION

Operating without the explicit knowledge of their managers, a rogue employer supervisor, worker or labour provider consultant may be acting alone or colluding with others or in association with an external gang to exploit workers for personal gain.

- **The employer supervisor** dictates which agency or casual workers get work, are given overtime or can be transferred from temporary to permanent status. Agency or casual workers can be required to pay cash bribes or kickbacks from wages. The supervisor ensures that he remains close to these workers if anyone in authority attempts to speak to them.
- **The labour provider consultant** has the power to dictate which agency workers get work or are sidelined on each shift, or can even terminate their employment. They receive the better paid or more regular jobs and may be able to fraudulently amend timesheets to add hours or ghost workers. They could implement a regular turnover of workers, in order to extract bribes for work upfront. They may also demand payment for guaranteeing future work.
- **Worker at labour provider or employer** could be an individual with good English/local language skills who may be regarded as an asset and used as an unofficial translator and organiser.

This person may claim special connection with the labour provider or employer managers and claim to, or actually have, the authority to organise work for fellow workers. They may be a minibus driver who has the power to choose who gets on the bus to work and who doesn't, and may introduce "friends and relatives" to the employer. Once again, they may be acting benignly or may be using varying levels of coercion, force and intimidation. They may require payment or other favours for services. They may take a fee for organising work and or transport, either directly or through a third party contact.

ACCOMMODATION BASED EXPLOITATION

- **Labour provider consultant/employer supervisor controlled:** Access to work may be made dependent on using a connected person's accommodation. There could be threats of no work if the worker leaves the accommodation and eviction if the worker leaves the job. The perpetrator may charge higher amounts for accommodation than the amount actually earned and reduce workers' hours as part of this process, to create a debt relationship.
- **The rogue landlord:** Accommodation may be provided free of charge 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 landlord to apply uncontrolled interest rates, thereby trapping the tenants.

Accommodation may be unhygienic, unsafe, unlicensed and overcrowded. There will be no licence or tenancy agreement in place. Prohibitive interest rates will be applied through intimidation and force. There may be threat of violence or other detriment if they leave the accommodation.

This model enables people to be controlled without link to the provision of work. It may be tied into organised criminality.

ORGANISED CRIMINAL GANGS AND EXPLOITERS

The business model of organised criminal gangs and exploitative individuals is based on:

- Recruiting their own team of workers
- Establishing control, dependency and entrapment through the methods explained in the previous section
- Forcing their victims to apply for work without telling the employers and labour providers that they are being controlled
- Retaining the victims' wages and exploiting whatever other opportunities there are to maximise revenue from them such as fraudulent claims for benefits and tax credits, bank loans and credit cards
- Establishing surveillance systems to monitor whether their activities are in danger of being exposed
- Rapidly moving workers when there is the potential of being caught out
- The security of knowing that they are unlikely to be caught, and, if so, the penalties are relatively minor.



WHO IS AT RISK OF BEING A VICTIM OF FORCED LABOUR?

Forced labour involves one person or a gang depriving another person or group of people of their liberty in order to exploit them for commercial gain. Forced labour can happen in any country.

The risk of exploitation increases whenever or wherever people are vulnerable, irrespective of nationality or gender. Some groups are particularly at risk because of their ethnic background, relative poverty, disability or migrant status:

- **Displaced persons** forced to migrate because of **war or persecution**
- **Young people** and **unskilled** or **illiterate** workers who may be less aware of their legal rights than older, more skilled and better educated workers
- **Migrant workers¹³**, particularly those with an irregular status, whose vulnerability can be exploited through coercion.

Not having the appropriate immigration status, or legal right to work in the country where they are located, puts individuals seeking paid work at high risk of exploitation. However, in the majority of situations, victims rescued from forced labour conditions do have the legal right to work in that country.

Migrant workers and displaced persons are particularly susceptible to being trapped in a forced labour situation because:

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

The global construction industry depends heavily on migrant labour. Conversely, migrants from low wage countries believe that working on construction projects could help them raise their families out of poverty. These dual forces increase the risk of modern slavery within the sector.

There is no doubting the importance of migrant labour both to the private and public sectors of both developed and developing nations. Without migrant labour, many organisations would struggle to complete major infrastructure programmes and building schemes on time.

From the perspective of unskilled labourers from low wage countries, many see working abroad as one of the only means of feeding their families and climbing out of poverty. For impoverished nations, the economic importance of exporting labour should not be underestimated. For example, in Bangladesh: in 2009, migrant workers from the country sent home more than US\$10 billion. This was 12 times greater than foreign direct investment and six times more than total foreign aid received that year. In Nepal, remittances sent back by expatriates to their families in the same year accounted for 22.3% of GDP.¹⁴

This desperate financial need combined with endemic corruption causes the most vulnerable workers in the supply chain to be at greatest risk of exploitation.

¹³ The International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families defines a migrant worker as "a person who is to be engaged, is engaged or has been engaged in a remunerated activity in a state of which he or she is not a national". In some cases, "internal" migrant workers who are recruited within a country may face similar risks as those crossing international borders."

¹⁴ Migrant Labour Recruitment to Qatar, Report for Qatar Foundation Worker Welfare Initiative, Dr Ray Jureidini, page 14

SECTION B

PRACTICAL STEPS FOR BUSINESS

Construction supply chains are long and fragmented with complex inter-relationships between tiers of subcontractors, labour agencies and materials suppliers. Although transparency is difficult to achieve, solutions are possible with broad collaboration and long-term commitment.

In addition to the indicators laid out below, Stronger Together offers training solutions to assist businesses in tackling modern slavery.

SPOTTING THE SIGNS OF EXPLOITATION IN VICTIMS

There is no set number of indicators for determining whether a person is a victim of trafficking or forced labour. Some signs may be more prevalent than others and each case should be considered on an individual basis.

The following indicators of exploitation should be considered within the context of the other evidence. On uncovering signs of vulnerable and exploited workers, please refer to the "Response plan on discovering potential serious worker exploitation" within this toolkit.

PHYSICAL APPEARANCE

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

- Malnourished
- Dirty
- Frightened, withdrawn and confused
- They may have injuries that seem to be the result of an assault.

FEW OR NO PERSONAL POSSESSIONS

Exploited workers may have:

- No money
- No personal items such as purses, wallets or jewellery
- Few 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 regarding their availability to work
- One person speaks on behalf of a number of workers and the victims look to him or her for support or permission
- They are accompanied to work and back. For example, a driver may drop off and collect them.

RELUCTANCE 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 don't know who to trust or fear retribution.

GOOD PRACTICE OPERATIONAL & MANAGEMENT PROCESSES FOR DETERRING LABOUR EXPLOITATION

All construction businesses can follow employer good practice to identify and deter hidden labour exploitation.

The following list, which is also available to download at www.stronger2gether.org, provides a range of good practice operational and management processes that may be implemented by employers to deter hidden labour exploitation and/or to identify issues at an early stage.

Through colour coding, the table below indicates where steps are:

KEY	Relevant for both employers and labour providers
	Relevant for labour providers
	Relevant for employers

The table is split into nine sections:

- A. Management Systems Good Practice**
- B. Training to Build Capacity and Capability**
- C. Labour Sourcing Good Practice**
- D. Recruitment Processes Good Practice**
- E. Worker Records Analysis to Alert Risks Good Practice**
- F. Worker Allocation Good Practice**
- G. Workplace Monitoring Good Practice**
- H. Worker Engagement Good Practice**
- I. Providing Access to Remedy Good Practice**

A	MANAGEMENT SYSTEMS GOOD PRACTICE	TICK IF DONE
1	The employer/labour provider has developed and implemented a "Tackling Modern Slavery" policy, specific to its own business, which details the processes it will take to prevent forced labour and labour trafficking and the steps it will take should such practices be identified within its business.	
2	The employer/labour provider has appointed someone at the most senior management level within the business to have responsibility for the human rights, ethical trade and corporate social responsibilities of the business including an explicit responsibility for preventing modern slavery.	
3	Where the employer/labour provider has formal workforce representation arrangements, it has consulted with and seeks to work collaboratively with trade union and/or employee representatives on its tackling modern slavery programme.	
4	The labour provider can demonstrate the actions it takes to embed a culture of trust where workers are valued and treated with dignity and respect and can raise issues without fear of retribution.	
5	The labour provider has processes in place to ensure that control of workers of a particular nationality is not placed in the hands of one consultant of the same nationality.	
6	Employers should demonstrate good business practice in the due diligence checks carried out in the appointment of labour providers to establish their credibility and legitimacy.	

A	MANAGEMENT SYSTEMS GOOD PRACTICE	TICK IF DONE
7	Employers should only contract with formal labour providers with an identifiable and distinct legitimate business entity.	
8	Employers should understand the legal operating conditions for labour providers in that country and sector and ensure that any system of licensing, certification or other regulation as required by national law and practice is properly complied with.	
9	The employer/labour provider can demonstrate that its policy and practice is to commit managers and consultants, where appropriate, to work proactively and collaboratively with enforcement authorities such as the police to assist in crime prevention and prosecution.	
10	Employers can demonstrate that their anti-bribery and corruption policies are agreed, applied and complied with in arrangements with labour providers.	
11	The employer/labour provider can demonstrate that it has issued its managers, consultants 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 templates on www.stronger2gether.org).	
12	The employer/labour provider can demonstrate that it has improving ethical labour standards as a fixed agenda item during progress meetings with its labour providers/labour user clients and reviews collaborative informal and formal approaches to identifying, preventing, deterring, tackling and reporting hidden labour exploitation.	
13	The employer/labour provider can demonstrate that: there is a formal written process for supervisors and workers/consultants and recruiters to report and record suspected cases of labour trafficking, forced labour and other hidden labour exploitation; supervisors and workers/consultants and recruiters are aware of and use this process and; management deal with such reports appropriately.	
14	The employer can demonstrate that it has informed the labour provider of the senior manager within its organisation who the labour provider can talk to confidentially about potential harassment and/or discriminatory, unreasonable or suspicious actions by any of the employer's supervisors.	
15	The employer/labour provider can demonstrate that no issues relating to trafficking or exploitation have been highlighted in ethical audits conducted by social compliance audit bodies, or where they have been identified, even if recorded as an 'observation', they have been formally investigated and resolved.	
16	The employer/labour provider has in place a process for using independent interpreters or a telephone interpreting line for when it is necessary at short notice to conduct surveys, investigation interviews or complaints interviews.	
17	The labour provider can show that it has a programme of auditing the application and effectiveness of its steps to recognise, prevent and deal with forced labour, labour trafficking and other hidden third party labour exploitation.	
18	The employer has agreed with its labour providers a transparent and non-discriminatory temporary-to-permanent selection process which is effectively communicated to agency workers.	

KEY

- Relevant for both employers and labour providers
- Relevant for labour providers
- Relevant for employers

A	MANAGEMENT SYSTEMS GOOD PRACTICE	TICK IF DONE
19	The employer/labour provider can demonstrate that it regularly conducts audits to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout its business.	
20	The employer can demonstrate that it has a written procedure with the labour provider, stating that the allocation of available work will be done in a fair and objective way that is communicated and understood by the agency workers. This should ensure that only nominated and suitably trained individuals have the authority to book agency workers; that the selection of workers to work on a particular shift/overtime is fair, transparent and non-discriminatory. It should rely on the labour user specifying the number of skills/roles required rather than named individuals. It should avoid situations where workers congregate in the hope of work and employer supervisors pick from a crowd.	
B	TRAINING TO BUILD CAPACITY AND CAPABILITY	TICK IF DONE
21	The employer senior managers/labour providers responsible for leading the organisation's/region's/site's "Tackling Modern Slavery" programme have attended training in recognising, preventing, and dealing with forced labour, labour trafficking and other hidden third party labour exploitation.	
22	The employers/recruiters/labour providers have undertaken training in recognising, preventing, and reporting forced labour, labour trafficking and other hidden third party labour exploitation.	
23	The employer's supervisors have undertaken training in recognising, preventing, and reporting forced labour, labour trafficking and other hidden third party labour exploitation.	
24	The employer's supervisors and managers are trained and instructed to whistleblow where they have a concern over another manager, supervisor, or labour provider consultant.	
25	The employer has trained security staff to spot the signs that may indicate potential worker exploitation and how to report any concerns to appropriate managers.	
26	The employer's/labour provider's induction training for new workers includes a section on how to recognise and report forced labour, labour trafficking and other hidden third party labour exploitation.	
27	The employer/labour provider has trained all existing workers on how to recognise and report forced labour, labour trafficking and other hidden third party labour exploitation.	
C	LABOUR SOURCING GOOD PRACTICE	TICK IF DONE
28	The employer/labour provider has a written policy stating that the cost of recruitment is a business cost and that no fee or cost for recruitment will be charged to workers, directly or indirectly, in whole or in part.	
29	Where the labour provider uses another agency to source or supply workers, it has written contractual terms with that business specifying that workers will not be charged work finding fees nor will be required to pay for goods or services integral to the work finding process.	

KEY
 Relevant for both employers and labour providers
 Relevant for labour providers
 Relevant for employers

C	LABOUR SOURCING GOOD PRACTICE	TICK IF DONE
30	Where the labour provider uses another agency to source or supply workers, it can demonstrate that the business model process allows the sourcing agent to earn a sustainable margin without charging workers work finding fees or requiring them to pay for goods or services integral to the work finding process.	
31	Where the labour provider uses another agency to source or supply workers, it can demonstrate that it audits the process, including worker interviews, to confirm that workers have not been charged work finding fees nor have been required to pay for goods or services which are integral to the work finding process.	
32	Where the labour provider uses another agency or labour provider to source or supply workers, this is only with the prior written agreement of the hiring client.	
33	The employer monitors and enforces policy with its labour provider and any labour sourcing agents that recruitment is not charged to workers, directly or indirectly through the required purchase of goods or services.	
34	The employer has discussed and agreed the labour sourcing methods and channels used by its labour provider and understands its labour sourcing supply chain.	
35	The employer/labour provider can demonstrate that it has processes in place to prevent individuals, however seemingly well intentioned, to introduce significant numbers of workers for work (accepting that verbal introductions to close friends and family are likely to be harmless).	
36	The employer has discussed and agreed a fair and non-discriminatory recruitment process with its labour providers.	

D	RECRUITMENT PROCESSES GOOD PRACTICE	TICK IF DONE
37	The employer/labour provider can demonstrate that its recruiters and consultants are trained and instructed to report and record where a number of work seekers are introduced by a particular individual, usually of the same nationality, often with good local language skills. Regardless of whether the person claims to be a friend or relative, they are trained to spot warning signs, such as whether he or she is controlling the conversation and and/or is waiting whilst the individuals are being interviewed.	
38	The labour provider can demonstrate that its recruiters and consultants are trained and instructed not to allow work seeker registration documentation to be removed from the recruiting office and only to allow such documentation to be completed in the visible presence of recruiters.	
39	The employer/labour provider can demonstrate that its recruiters and consultants are trained and instructed to report and record where registration documents appear to have been removed and completed externally. They may have been brought in by one individual on behalf of his "friends or family" and/or be in a higher standard of the local language than the work seeker possesses and/or have not been completed in the same handwriting.	
40	The employer/labour provider can demonstrate that recruitment of workers is only undertaken by recruiters who have been trained in the organisation's processes to recognise, prevent and report forced labour, labour trafficking and other hidden third party labour exploitation. It should not be delegated to a temporary agency worker who operates with little control or supervision.	

KEY	Relevant for both employers and labour providers
	Relevant for labour providers
	Relevant for employers

D	RECRUITMENT PROCESSES GOOD PRACTICE	TICK IF DONE
41	The employer/labour provider can demonstrate that during the worker selection process the recruiter asks and records: <ul style="list-style-type: none"> • How the worker found out about the work • Whether the worker has paid anyone, or will have to pay anyone to obtain the work in question • If they are a newly arrived migrant, whether they have paid anyone for travel. 	
42	The employer/labour provider can demonstrate that any literacy, numeracy or other testing is conducted in a controlled environment with a format that is regularly changed to prevent coaching of individuals.	
43	The employer/labour provider can demonstrate that the recruitment process records a worker's landlord name and verifies a worker's address by asking to see a rent book or contract. Recruiters and consultants are trained and instructed to report and record where a work seeker states that they rent from a landlord who works for the labour provider or employer.	
E	WORKER RECORDS ANALYSIS TO ALERT RISKS GOOD PRACTICE	TICK IF DONE
44	The employer/labour provider systematically checks the addresses shown on the employment records of its workers and jobseekers to identify high occupancy of particular houses and acts accordingly on the information.	
45	The labour provider works in partnership with its clients to check addresses to identify high shared occupancy of particular houses between the labour provider and client workers and acts accordingly on the information.	
46	The employer/labour provider systematically checks bank accounts to identify unrelated workers paid into one account and acts accordingly on the information.	
47	The employer/labour provider systematically checks mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers and acts accordingly on the information.	
48	The employer/labour provider systematically checks emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number and acts accordingly on the information.	
49	The employer/labour provider systematically checks workers' landlord's 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.	
50	The employer works in partnership with its labour providers to cross reference worker records information as detailed above and acts accordingly on the information.	
51	Employer conducts formal re-checking of bank accounts; addresses; personal details etc. when agency workers move from temporary to permanent status.	

KEY	Relevant for both employers and labour providers
	Relevant for labour providers
	Relevant for employers

F	WORKER ALLOCATION GOOD PRACTICE	TICK IF DONE
53	The labour provider has a written procedure, agreed with the hiring client, for the allocation of available work to the pool of workers to be done in a fair and objective way that is communicated and understood by the agency workers.	
54	The labour provider's recruiters and consultants are trained and instructed to report and record where an individual appears to be answering phone calls on behalf of others, accepting work shifts on behalf of others and/or is requesting work on behalf of others.	
55	The labour provider can demonstrate 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. It should not be delegated to a temporary worker, working with the team, who operates with little control or supervision.	
56	The labour provider can demonstrate that the responsibility for the selection and allocation of which workers can work in a particular group of workers is rotated from time to time.	
57	The labour provider's recruiters and consultants are trained and instructed to report and record where registered workers keep turning up to see if work is available and appear to be accompanied by individual(s) who stay in the background and overlooking their behaviour.	
G	WORKPLACE MONITORING GOOD PRACTICE	TICK IF DONE
58	The employer directs security cameras and security officers to areas where workers disembark from transport to work to monitor any potential suspicious activity.	
59	The employer's supervisors and/or security officers/labour providers can demonstrate that their recruiters and consultants are trained and instructed to monitor, record and report where workers are delivered and collected from work where such transport and the drivers raise cause for suspicion, such as the type of vehicle, the demeanour of the drivers and passengers.	
60	The employer's supervisors/labour providers can demonstrate that their recruiters and consultants are trained and instructed to monitor, record and report where agency and direct workers/workers and jobseekers appear frightened, agitated or secretive; act as if they are instructed by another and/or look to another to speak on their behalf; reject help and support when offered.	
61	The employer's supervisors/labour providers can demonstrate that their recruiters and consultants are trained and instructed to monitor, record and report where agency and direct worker's physical appearance may show signs of injury and malnourishment; their general appearance may be messy or unclean with inappropriate clothing; they may have few or no personal effects; little or no money for food.	
62	The labour provider can demonstrate that its recruiters and consultants are trained and instructed to monitor, record and report where an individual seems to be in charge or control of other workers, such as presenting jobseekers ID documents and speaking for them at registration; trying to get them booked onto shifts; speaking on their behalf when answering calls; staying close to a group of workers and overseeing them when anyone from authority is present.	



- Relevant for both employers and labour providers
- Relevant for labour providers
- Relevant for employers

G	WORKPLACE MONITORING GOOD PRACTICE	TICK IF DONE
63	The labour provider can demonstrate that its recruiters and consultants are trained and instructed to whistle blow when they have a concern over a particular labour provider consultant such as a rise in the number of workers of the same nationality; certain groups of workers unreasonably favoured over others or a labour user supervisor who may be insistent on having certain named workers without justification.	
64	The employer's supervisors/labour providers can demonstrate that their recruiters and consultants are trained and instructed to monitor, record and report where a group of workers (who may, live work and/or travel together) stop working suddenly for no particular reason.	
65	The employer appoints trusted worker welfare officers or integration officers who speak representative languages to gain the trust of fellow workers and come forward with information of workers experiencing difficulties.	
H	WORKER ENGAGEMENT GOOD PRACTICE	TICK IF DONE
66	The employer/labour provider can demonstrate that it has issued workers with a "Stronger Together" multi-language leaflet to raise awareness of how to recognise and report hidden exploitation.	
67	The employer/labour provider displays the "Stronger Together" posters on site notice boards and in its branches where they may be viewed by all workers.	
68	The employer/labour provider can demonstrate that it encourages supervisors and managers/consultants to regularly talk informally to workers to seek to gently uncover whether there are any experiencing issues such as harassment, coercion, bullying, control or exploitation.	
69	The employer/labour provider issues occasional confidential questionnaires to a sample of its workers through a variety of means i.e. email, post, group completion to identify potential worker exploitation (questionnaire available on www.stronger2gether.org). This process should be conducted in a controlled environment to prevent any outside influence.	
70	The employer/labour provider uses independent NGOs, migrant worker support groups or other worker welfare organisation to speak to workers in their native language in a supportive manner to identify if there are any issues.	
71	The employer/labour provider has formal worker representation arrangements and engages with worker representatives or where these do not formally exist speaks with groups of workers to determine if there may be any issues with harassment, coercion, bullying, control or exploitation and to discuss whether there are any ways the labour provider can improve its processes or better engage with workers.	
72	The employer conducts regular staff briefings on trafficking and forced labour.	
73	The employer and trade union and/or employee representatives have hidden labour exploitation as an agenda item during progress meetings and review collaborative informal and formal approaches to identifying, deterring and reporting this issue.	



- Relevant for both employers and labour providers
- Relevant for labour providers
- Relevant for employers

I	PROVIDING ACCESS TO REMEDY GOOD PRACTICE	TICK IF DONE
74	The employer/labour provider can demonstrate that it has a complaints/grievance process in a comprehensible format which has been issued for retention by each worker and is operated fairly and in line with natural justice.	
75	The employer has verified that its labour provider has a complaints/grievance process in a comprehensible format, as above.	
76	The employer/labour provider has a multi-language confidential helpline process through which issues can be raised confidentially by phone, email or in writing to either: the labour user workforce helpline; an independent specialist helpline service; a senior manager/HR specialist who is separate to the direct supervision of the workers.	
77	The employer/labour provider can demonstrate that it has a whistleblowing procedure whereby supervisors and managers can confidentially raise issues of concern to a member of the senior team without fear of retribution.	

KEY

Relevant for both employers and labour providers

Relevant for labour providers

Relevant for employers



RESPONSE PLAN ON DISCOVERING POTENTIAL SERIOUS WORKER EXPLOITATION IN YOUR BUSINESS

All businesses should develop a “Response Plan” for all their sites in accordance with recommended best practice in the relevant country/region which specifies how managers, supervisors and workers should handle, report and record suspected cases of labour trafficking, forced labour and other hidden labour exploitation when discovered within the business.

“Response Plans” should be developed with specialist NGOs, enforcement authorities and other relevant stakeholders.

Initial suspicions of potential serious exploitation may be raised through a variety of routes such as an internal investigation for another matter which uncovers potential indicators of forced labour, due diligence checks of alert monitoring flags, auditing processes or as a result of whistleblowing or a victim reporting exploitation.

Forced labour is a serious offence. Good business practice in dealing with suspected forced labour requires a set of immediate actions to be followed which may be summarised as:

1. Protect and support at risk individuals
2. Report to authorities
3. Capture and protect evidence.

It is essential to take immediate action in cases of suspected forced labour or other hidden labour exploitation, as ignoring such situations allows exploitation to flourish or to be hidden to prevent future identification, potentially increasing the control of, and threats to, workers.

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.

The action to take will depend on the nature of the exploitation discovered, but should follow the business’ “Response Plan”. Each business should prepare and publish a “Response Plan” which details, in accordance with recommended best practice in the relevant country/region where the exploitation occurs, how managers, supervisors and workers should handle, report and record suspected cases of labour trafficking, forced labour and other hidden labour exploitation when discovered within their own business.



A "Response Plan" specifies how a business will:

1. Determine the appropriate enforcement body and/or the appropriate victim support organisation to report the exploitation to and to offer support to victims
2. Communicate clearly to managers, supervisors and workers
3. Protect and support at risk individuals
4. Report to authorities
5. Capture and protect evidence
6. Share with first tier suppliers, labour providers and extended supply chain
7. Develop and implement a "Remediation Policy"

1. DETERMINE THE APPROPRIATE ENFORCEMENT BODY AND THE APPROPRIATE VICTIM SUPPORT ORGANISATION

The area of the world that the suspected presence of forced labour and/or human trafficking is occurring will have an impact on the appropriate organisation that can provide support in the investigation and enforcement against the perpetrators. Although forced labour and human trafficking are crimes under international law, in some areas of the world, in case of suspected incidents the police may not be the most capable or effective organisation to assist.

As suspected cases of forced labour should be dealt with immediately, effectively and comprehensively, when businesses develop their "Response Plan" to tackle modern slavery in their business, they should include an assessment of the most appropriate organisation to report any suspected cases of modern slavery to.

The appropriate framework for dealing with potential victims puts the needs of the victim at the centre of processes to be followed. This "victim centred approach" ensures that the needs of the individual are put at the forefront of any action that is taken. The primary and paramount importance when dealing with a potential victim of modern slavery is to ensure their safety and welfare of the victim. This takes immediate precedence over any consideration of a criminal or civil investigation. Victims are classed as vulnerable and may be in a highly traumatised state. It is therefore essential to have determined the most appropriate organisation and method to provide immediate support to victims to ensure their safety and security.

The Global Modern Slavery Directory available at www.globalmodernslavery.org can be used as a starting point for the assessment to find relevant local or national hotlines or organisations working on human trafficking and forced labour to report to or to provide victim support.

When businesses develop their "Response Plan" to tackle modern slavery in their business, they should include an assessment of the most appropriate enforcement body and the most appropriate organisation to support victims of modern slavery in all areas it operates. The contact details and availability of the services (for example 24 hours a day, during office hours, etc.) of the identified organisations should be included in the "Response Plan" and shared with all relevant staff members.

With regard to enforcement, please note that different sectors in a country might be regulated by different authorities/agencies.

Also, victim support organisations sometimes work with a particular group of victims (e.g. based on gender, age, type of exploitation), ensure you check this and determine one or more appropriate organisations.

2. COMMUNICATE CLEARLY TO MANAGERS, SUPERVISORS AND WORKERS

The "Response Plan" should be clearly communicated to managers, supervisors and workers, so they know how to handle, report and record suspected cases within the country and region. Understanding of the "Response Plan" should be assessed.

3. PROTECT AND SUPPORT AT RISK INDIVIDUALS

As mentioned previously, the primary responsibility when dealing with a potential victim of modern slavery is to ensure his/her safety and welfare, and is fundamental to the approach taken by any organisation involved in the support of potential victims.

Where criminal exploitation is believed to be involved and/or the worker is in real and immediate danger, notification must be made to the police/law enforcement agency and/or relevant NGO/Governmental departments and initial protection provided by the employer for the worker until law enforcement arrival.

The action to be taken will depend upon the circumstances which prevail, however:

- Remain with the potential victim in a place in which you feel safe. Where possible have a colleague present. Do not draw attention to the fact that s/he has sought assistance, for example, do not keep the potential victim in view of those who may be controlling him/her or even those working alongside that person;
- Where there is more than one potential victim it is advisable to put them in separate rooms. It may not be possible to know who is being exploited and who is an exploiter. Where the exploitation of one job applicant or worker is discovered, due consideration must be given to the risk of other job applicants or members of the workforce also being in an exploitative situation;
- Remember that your key role is to protect the victim, not to conduct an investigation. Reassure potential victims that their confidentiality will be protected. Offer support and reassurance recognising that these individuals may be psychologically traumatised;
- Seek advice from the identified enforcement agency and/or support organisation on how to proceed. Determine whether, and if so at what stage, support should be sourced for the affected individuals.

Labour providers or employers who uncover signs of trafficking or forced labour within their organisations may, with the individuals' approval, refer potential victims to organisations with the appropriate skills and authority to provide victim support services.

The victim support organisation will ensure that the potential victim understands the support that they are able to offer support which should include safe accommodation and access to a range of support services tailored to their individual needs, for example counselling. Interpreters will be used to ensure information is provided to the potential victim in a language that they understand. This helps to avoid any further harm and builds trust between the victim and the investigating body.

- Where possible remain with the potential victim until they can be "handed over" to the police/law enforcement agency or other victim support organisation. If that is not possible, make sure that the individual has received and understood any advice given about attending a meeting elsewhere with the police/relevant organisation;
- Consider whether an interpreter is needed; use only trusted or independent interpreters or a telephone interpreting service. Do not use other workers who speak the same language.

Make a record of any concerns and information which may be useful at a later stage should an investigation be appropriate.



4. REPORTING TO THE AUTHORITIES

If you have any suspicion regarding the potential presence of forced labour and/or human trafficking, you should contact the police or other identified relevant enforcement organisation immediately. To continue thereafter without informing the authorities is to run the risk that any necessary 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 miss an opportunity to do so.

When contacting the appropriate organisation, you will need to be clear about the circumstances and why you consider that it is a case of forced labour, human trafficking or modern slavery. This will enable law enforcement agencies to make an assessment of what steps to take next and the advice to give you.

5. CAPTURING AND PROTECTING EVIDENCE

Human trafficking and modern slavery are criminal offences. The circumstances of any offence will need to be investigated and evidence will need to be obtained by law enforcement agencies where appropriate. This will include establishing the circumstances around the identification that someone may be a potential victim and the steps taken at that point.

Each business should have a written, agreed "Policy on Preventing Hidden Labour Exploitation" (template available on www.stronger2gether.org) which includes the "Response Plan" and "Remediation Policy". This policy should specify the internal lead manager who will direct matters relating to human trafficking and modern slavery when they are suspected within a business.

This should be a competent trusted manager that:

- Is knowledgeable about internal procedures;
- Understands indicators of forced labour;
- Knows how and when to refer matters to the appropriate authorities.

All supervisors and particularly those managers that undertake grievance or disciplinary hearing investigations should:

- Have a knowledge of the general indicators of forced labour;
- Know to halt the internal investigation and the procedure to follow when they identify such indicators during such investigations and the importance of immediate referral to the authorities;
- Understand that incorrectly deciding to continue with an internal investigation can undermine the ability to secure an effective criminal investigation and prosecution outcome;
- Understand that they may become a witness in any criminal investigation;
- Ensure appropriate confidentiality to ensure that the exploiters are not alerted that their activities have been identified;
- Ensure appropriate measures are implemented to protect the identity of any job applicants or workers who may be victims of exploitation.

If it is suspected that there is a case of human trafficking, forced labour or related worker exploitation, interviews with potential victims should be conducted by someone from the police or other relevant organisation that has the requisite skills and powers/authority. Previously investigations into serious cases of exploitation have not been able to be taken forward because of the way initial internal enquiries have been undertaken. Though conducted with the best of intentions these have resulted in unintended consequences of perpetrators being tipped off, evidence being polluted and becoming unreliable and situations where the appropriate state prosecution service has decided that it is not in the public interest to consider criminal prosecution.

It is therefore essential to:

- Open an enquiry file; keep a file with all documents and records of conversations relevant to the enquiry.
- Where appropriate, and after due consideration of risk to the worker and all parties involved, both the labour provider and hiring employer should work in partnership.
- With all due regard to confidentiality, internally review the Labour Provider/Employer good practice to identify and deter hidden labour exploitation from this toolkit to identify any indicators of potential worker exploitation and complete a "Record of Potential Third Party Exploitation" (template available at www.stronger2gether.org). This will help to organise known information and prepare it for referral to the relevant law enforcement organisation.

With regard to taking and storing notes:

- 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 the details of what was said by the potential victim, and your responses. This does not have to be verbatim but should be recorded as soon as it is practical to do so.
- Any documents given to you by a potential victim should be retained and the reasons why you have been given them recorded.
- Record your reasons for believing that any person is a potential victim.
- Note the actions you took and when.
- Notes should be timed, dated and signed by the person making them.
- Any notes, personnel or work records in respect of a potential victim should also be stored safely and made available to law enforcement agencies when any investigation is taken forward by them.
- Retain original documentation and any notes in the original format for a period of six years.
- If documents such as registration forms or worker application or any other potential exhibits are handed over, bag them up to preserve for fingerprints/DNA (if you do not have bags then envelopes can be used). Handle items with gloves where possible to avoid any contamination. Record where you store them and who they are passed to. If possible lock them anyway securely where they cannot be interfered with. If you suspect an item might be useful it is better to preserve it at the time than to try to recover it at a later date.
- Collect and preserve security camera evidence if in place. Ensure that any security camera systems are working and there is sufficient hard disk memory space to capture the data and an ability to copy evidence to blank CD's or memory sticks.
- If a worker has injuries – capture it on a mobile phone/camera before it is lost.
- Record vehicle registration numbers of any vehicles used by potential offenders as the opportunity arises but only if safe to do. The use of a camera phone is ideal.
- Get descriptions of offenders (photograph them if safe using mobile phones etc.). If they offer up passports or other identity documents take and retain copies of them.
- Record details of persons present during any disclosure.
- If possible also obtain contact details of any potential witnesses.

The above is particularly important when a case is considered for legal proceedings. In order 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 when taking proceedings. They are also bound by legislation to report any facts or information which could assist the defence of any person accused of committing an offence.

Therefore, early engagement with law enforcement in cases where you have an initial suspicion will allow them to guide and support you along with advising you with regard to what records should be made. Any material obtained at this early stage is likely to be of significant value further down the process.

If in any doubt seek advice from law enforcement or other expert organisations.

6. SHARE WITH THOSE WORKING ON YOUR BUSINESS' BEHALF

The “Response Plan” should be shared by businesses with those working on their behalf or in any of their operating sites, including first tier suppliers, labour providers, extended supply chain, relevant auditors, etc. so it can be adopted and implemented for their use in line with your business’ policy.

Businesses should require those working on their behalf or in their business to undergo an ethical/social compliance audit which specifies how auditors and other third parties should respond when they discover a potential or actual case of forced labour within that business. The process should be tested to ensure it functions well and is effective.

7. DEVELOP AND IMPLEMENT A “REMEDIATION POLICY”

Businesses should develop a “Remediation Policy” for human rights abuses and particularly forced labour found within their business for all their operating sites.

The “Remediation Policy” should include:

- d.** A process to gather information from those affected on what it would take to remedy the wrongs
- e.** Correction of the situation for the victim(s) which may involve restitution, compensation, rehabilitation and satisfaction
- f.** Contribution to programmes and projects to assist victims through vocational training and other appropriate measures
- g.** Statements clearly acknowledging victims’ rights to pursue other forms of remedial action, at any stage in the process, beyond company grievance or other internal remedy mechanisms

The policy should be scenario tested and accepted as a best practice approach for the relevant country and region by relevant stakeholders such as customers, business associations, unions, public authorities and NGOs.

Businesses should work with and support their at risk service providers/contractors, labour providers, external sites containing their finished branded product and suppliers to have implemented a best practice “Remediation Policy” for human rights abuses and particularly forced labour found into their organisations.

With regard to recruitment fees, businesses should implement a policy and process (as part of the “Remediation Policy”) in accordance with internationally accepted standards, agreed with labour providers and suppliers. It should state that, in the event that it is discovered that fees have been paid, directly or indirectly in the form of paying for services integral to the recruitment process, in whole or in part, during any recruitment processes conducted throughout the labour supply chain that such fees are reimbursed to the workers affected. It is recommended to make this a contractual requirement in contracts with service providers/contractors, labour providers, external sites containing the finished branded product and first tier suppliers.

Businesses should put a process in place to review the “Response Plan” and “Remediation Policy” internally at least annually, which includes feedback from within the business and from third parties including how to stop violations re-occurring.

More details and guidance on how to work with suppliers to prevent or respond to reported violations can be found in the “Tackling Modern Slavery in Global Supply Chains” toolkit, available on www.stronger2gether.org.



SECTION C

PRACTICAL STEPS FOR BUSINESS - GLOBAL SUPPLY CHAINS

A number of construction companies have complex supply chains involving multiple organisations across numerous geographies.

These can include suppliers, contractors and consultants. In addition to the guidance and good practice laid out below, Stronger Together also provides training for supply chain actors in the construction industry.

FRAMEWORK FOR ACTION ON GLOBAL SUPPLY CHAINS

Since 2011, the UN Guiding Principles (UNGPs) on Business and Human Rights¹⁵ have been viewed as the authoritative global reference on business and human rights. They provide a clear framework that businesses can use to tackle modern slavery in their supply chains.

The UNGP provides a useful global approach for preventing and addressing the risk of business-related human rights abuses, including forced labour, trafficking and slavery. Importantly, it was unanimously endorsed by the UN Human Rights Council and obtained wide acceptance from the business community, trade unions, civil society and governments around the world.

The Guiding Principles are founded on three pillars:

1. **Protect** – states have a duty to protect, promote and support human rights
2. **Respect** – companies have a responsibility to respect human rights and “do no harm”
3. **Remedy** – both must ensure that victims of business-related abuses have access to effective remedy.

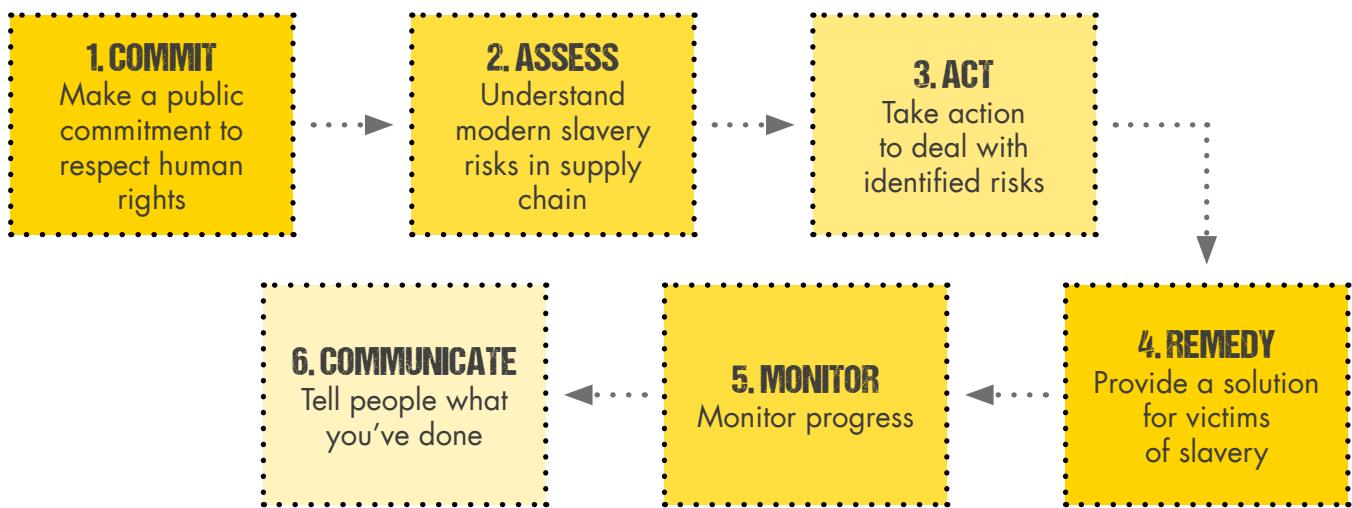
While the language of “human rights” is unfamiliar to many businesses, most companies have policies and procedures that cover a number of human rights issues. Examples include occupational health and safety policies prohibiting the use of child labour or forced labour. The UNGP recommends that businesses should expand what they already have in place to develop a human rights due diligence approach; through which organisations will be able to assure stakeholders that they are taking reasonable steps to avoid infringing upon the rights of others and tackling infringements where they occur.

Drawing on the UNGP approach, this toolkit outlines six practical steps for businesses to take when tackling forced labour, human trafficking and modern slavery in their supply chains.

The majority of the six steps are directed at the person or team responsible for coordinating and implementing the company’s approach to addressing modern slavery, including forced labour and human trafficking. Only Step 1 (COMMIT) outlines a number of steps directed at the CEO, or equivalent, and other individuals.

¹⁵ Office of the United Nations High Commissioner for Human Rights, 2011. *Guiding Principles on Business and Human Rights: implementing the United Nations “Protect, Respect and Remedy” framework*. Available at: www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

SIX STEPS FOR IMPLEMENTING THE UN GUIDING PRINCIPLES



STEP 1: COMMIT

COMMIT TO TACKLING MODERN SLAVERY

The first step of implementing a UNGP approach is for senior management to commit to tackling modern slavery.

The starting point is for businesses to assign the responsibility for addressing the human rights risks within the business and supply chain to a Board Director (or equivalent) and to senior functional managers to form a strategic level working group.

This strategic level working group must decide the scope of the business's human rights impact and define the business's vision for tackling modern slavery.

Businesses may be regarded as responsible in whole or in part for modern slavery in their supply chain, regardless of their size, location or type of business.

Businesses should think carefully about which rights, stakeholders and situations they can and do affect, whether directly through their own actions, operations, products and services or indirectly through their interaction and relationship with others, including suppliers.

It is important that businesses understand which people and/or organisations are affected by, or can affect, their actions, objectives and policies. These are the organisation's "stakeholders". Businesses can start by mapping their stakeholders in line with the diagram below in order to work out which individuals and groups they should be engaging with as they develop their strategy.

Mapping a business's stakeholders



Defining an organisation's human rights scope and vision will enable senior management to make a commitment to that vision, including allocating sufficient resources. Larger businesses usually need specific personnel to manage human rights risks such as modern slavery and forced labour in their business and supply chains. However, it is possible for small and medium-sized businesses to integrate due diligence processes into core business and decision-making activities.

Businesses need to ensure that they have a code of conduct in place that states their commitment to securing decent working conditions in their supply chain. The rules set out in the code of conduct must apply not only to the business's direct employees but also to suppliers, sub-contractors and other business partners. The code:

- Must express a corporate commitment to legal compliance, ethical standards and fundamental human rights as described in the ILO's international law on forced labour such as the Abolition of Forced Labour Convention (C105) and Worst Forms of Child Labour Convention (C182)
- Should be worded to avoid ambiguity and include the prohibition of indirectly benefitting from or contributing to modern slavery
- Should directly address and prohibit practices that are well known to contribute to the risk of modern slavery, such as charging workers recruitment fees
- Should include due diligence requirements in the case of recruitment intermediaries at any stage of recruitment, management or hire
- Are strengthened by integrating specific provisions on key risks, for example prohibiting compulsory overtime or passport retention
- Should be integrated into contracts with suppliers and applied to sub-contractors and business partners, including service providers such as recruitment agencies

- Should include provisions for grievance mechanisms at the highest level of the organisation so that workers have a confidential and safe process for raising any concerns
- Should take into account sector-specific and multi-stakeholder initiatives' codes of practice.

The steps below are intended as guidance for businesses making a commitment to tackle forced labour, bearing in mind their location, size and scope. Medium-sized and large businesses, for example, may benefit from preparing a strategy against forced labour as part of their corporate social responsibility, while this may be less relevant for small businesses. It is up to the individual business to assess which points are most relevant to their vision and scope.

Businesses that implement an approach to identifying and tackling forced labour in supply chains using the UN Guiding Principles should consider how this approach sits alongside addressing their other human rights impacts.

STEP 1 COMMIT – MAKE A COMMITMENT AT SENIOR MANAGEMENT LEVEL TO TACKLE MODERN SLAVERY THROUGHOUT YOUR SUPPLY CHAIN		TICK IF DONE
RESPONSIBILITY: CEO		
1	: Assign responsibility for addressing modern slavery and human trafficking to a Board level or equivalent director and senior functional heads.	
2	: Form a Strategic Working Group to tackle modern slavery. Include senior managers from departments including: corporate social responsibility, human resources, commercial, technical, procurement, and legal and corporate affairs.	
RESPONSIBILITY: STRATEGIC WORKING GROUP		
3	: Review existing internal policies and processes for tackling slavery and knowledge, experience and expertise. The working group should determine the need for capacity building, training and specialist support.	
4	: Develop preliminary map of the business's key stakeholders including rights holders, responsible organisations and potential external partners – experts, NGOs, industry bodies, relevant initiatives etc. (See figure above – "Mapping a Business's Stakeholders")	
5	: Develop the company's strategy for tackling modern slavery in its business and supply chain and determine the initial scope of the company's responsibility for tackling forced labour.	
6	: Seek agreement from CEO/ Board on vision and strategy.	
7	: Engage internally, communicating the vision and scope for tackling modern slavery and building allies.	
8	: Develop an initial implementation plan, allocating roles, responsibilities and resources, clarifying tasks and setting clear expectations and timetables.	

STEP 1 COMMIT – MAKE A COMMITMENT AT SENIOR MANAGEMENT LEVEL TO TACKLE MODERN SLAVERY THROUGHOUT YOUR SUPPLY CHAIN

TICK IF DONE

RESPONSIBILITY: INDIVIDUAL/TEAM RESPONSIBLE FOR IMPLEMENTATION

- 9 Compile all policy and procedural documents that contain, or should contain, clauses related to tackling modern slavery, for example:
- a. Company
 - Vision, values and principles
 - Ethical trading policy (See template on www.stronger2gether.org)
 - b. Procurement
 - Ethical procurement policy
 - Tender documents
 - Supplier contracts
 - Service provider contracts and service level agreements
 - c. HR/Training
 - Staff handbooks
 - Disciplinary procedures
 - Anti-Bribery and corruption policies (See template on www.stronger2gether.org)
 - Induction and training programmes
 - d. Recruitment
 - Fair hiring/ethical recruitment/responsible use of labour providers policy (see template on www.stronger2gether.org)
 - Labour provider contract and service level agreements
 - Labour provider social compliance audit framework
 - e. Technical/Social
 - Supplier social compliance audit framework
 - Contracts and service level agreements with audit bodies
 - Worker voice and access to remedy arrangements
- 10 Undertake a gap analysis on existing policies, contracts and procedures. Identify whether they do the following throughout all levels of the supply chain:
- f. Require all suppliers and labour providers to comply with International Labour Organisation Convention 181 concerning Private Employment Agencies Article 7 that: "1. Private employment agencies shall not charge directly or indirectly, in whole or in part, any fees or costs to workers"
 - g. Oblige all suppliers and labour providers to guarantee workers have freedom of movement and freedom to enter into and terminate employment
 - h. Oblige all suppliers and labour providers to inform workers of their rights and obligations in the workplace
 - i. Ensure effective capacity-building programmes are in place for suppliers and labour providers to give them the knowledge and resources to prevent and tackle modern slavery
 - j. Require all suppliers and labour providers to implement proactive good practice steps to ensure that slavery and human trafficking is not taking place in any of their supply chains, and in any part of their own business.
 - k. Ensure that audit methodologies examine and effectively report on the operational indicators of forced labour, bonded labour and trafficking, and that there is a clear victim-centred process for reporting forced labour and labour trafficking to the appropriate enforcement authorities.

STEP 1 COMMIT – MAKE A COMMITMENT AT SENIOR MANAGEMENT LEVEL TO TACKLE MODERN SLAVERY THROUGHOUT YOUR SUPPLY CHAIN

TICK IF DONE

RESPONSIBILITY: INDIVIDUAL/TEAM RESPONSIBLE FOR IMPLEMENTATION

10 (cont)	I. Ensure that suppliers' and labour providers' processes provide workers with access to raise issues and for these to be addressed through judicial or non-judicial means and have access to remedy without fear of retribution. m. Ensure effective and appropriate sanctions are in place for suppliers and labour providers that hold workers in a forced labour situation and/or are collusive with intermediaries who allow, or whose negligence allows, such conditions to exist.	
11	Update policies to contain up-to-date information on current international labour standards and consistent and clear tackling modern slavery clauses.	
12	Communicate draft policies, contracts and procedures internally and to suppliers, subcontractors, labour providers and other business partners for consultation and feedback.	
13	Finalise policies, contracts and procedures, translate them into all necessary languages for your business and supply chain, distribute to and obtain written confirmation from suppliers that they have read your policies and are conforming to policy requirements or are actively working towards conforming within a set timeline (see Self-Assessment Questionnaire on www.stronger2gether.org).	
14	Train human resources, compliance officers, auditors and other relevant staff in how to implement your policies and identify forced labour in practice (See SEDEX Guidance on Operational Practice and Indicators of Forced Labour, available at www.stronger2gether.org).	
15	Train suppliers and labour providers on how to implement the company's policies.	



STEP 2: ASSESS

ASSESS THE RISK OF MODERN SLAVERY

The second step of implementing a UNGP approach is to identify where the greatest risks of slavery occur in your supply chain. A clear understanding of risk helps businesses to prioritise their resources and to develop an appropriate action plan to minimise potential human rights abuses.

Slavery and human trafficking may occur in practically all industries and levels of supply chains. The most serious human rights impacts are more likely to occur where activities are sub-contracted out to suppliers and agents at very low cost and where the law is weak or not properly enforced. However, forced labour is found in developed economies in a wide range of sectors where vulnerable and migrant workers are employed.

Mapping a business's supply chain will identify not only where the risks of slavery and human trafficking are greatest but also where there is a lack of information about a business's direct and indirect suppliers. This process requires knowledge of the business, its supply chain, the countries and sectors operated in, and the risks associated with the operating environment. Any risk assessment will be improved by input from external stakeholders. A range of potential sources of risk information are listed in Appendix 1. Additional information from the supply chain may subsequently be required to understand the risks posed, particularly if a business is sourcing from a number of different countries.

STEP 2 ASSESS – AN ASSESSMENT OF WHERE A BUSINESS'S GREATEST RISKS OF SLAVERY OCCUR		TICK IF DONE
16	Draw up an initial high level assessment of your supply chain including direct and indirect suppliers, labour providers and contractors to identify low-, medium- and high-risk suppliers (see guidance available on www.stronger2gether.org).	
17	Identify which suppliers you spend the most with in your supply chain.	
18	Identify suppliers located in high-risk countries where labour rights are not protected.	
19	Identify known high-risk industries that have previously been affected by undeclared labour, illegal labour and a high incidence of trafficked persons.	
20	Identify where in your supply chain there are migrant workers who do not work under collective agreements.	
21	Identify where in your supply chain there is unskilled, temporary and/or seasonal labour.	
22	Identify where in your supply chain there are migrant workers/temporary staff employed under temporary contracts who are engaged by foreign or local temporary staffing agencies.	
23	Identify where in your supply chain there are subcontractors (possibly with several tiers in the supply chain), temporary staffing agencies and short-term seasonal contracts.	
24	Identify where in your supply chain there are job functions that are outsourced and carried out by migrant workers/temporary staff who are not immediately visible or noticeable because the work is carried out at night or in remote places.	

STEP 2 ASSESS – AN ASSESSMENT OF WHERE A BUSINESS’S GREATEST RISKS OF SLAVERY OCCUR

TICK IF DONE

- 25 Develop a risk assessment and rating processes for your supply chain based on the above risks which allows you to prioritise your high- and medium-risk suppliers (see guidance available on www.stronger2gether.org).
- 26 Refine your risk assessment through external engagement with stakeholders including customers, trade unions and NGOs.
- 27 Conduct additional assessments of high and medium risk suppliers including:
 - a. **Supplier assessment:** Request information from suppliers via a basic supplier assessment – see Self-Assessment Questionnaire available on www.stronger2gether.org for a template questionnaire. Review and respond to this information.
 - b. **Collective bargaining agreement:** Check worker and trade union rights at supplying sites - a collective bargaining agreement can usually be considered as evidence of a well-functioning social dialogue mechanism and constitutes good practice for ensuring decent working conditions.
 - c. **Human rights-supplier assessment:** Amend existing supplier assessments to include human rights impacts. This could be a risk management system, health and safety system, supply chain management system or supplier visits (SEDEX Guidance on Operational Practice and Indicators of Forced Labour available at www.stronger2gether.org).
 - d. **Spot check assessment:** Conduct unannounced or semi-announced supplier visits (a visit template is available at www.stronger2gether.org).
 - e. Management system certification: Request suppliers to gain management system certifications – for instance ISO 9001, ISO 14001, OHSAS 18001 or SA8000 all include processes that could be enhanced to include assessments of negative impacts on human rights.
 - f. **Social or ethical audits:** Commission social or ethical audits. Request that the audit firms include indicators of forced labour, modern slavery and human trafficking in their methodologies (SEDEX Guidance on Operational Practice and Indicators of Forced Labour available at www.stronger2gether.org)
 - g. **Human rights impact assessment¹⁶:** Carry out detailed human rights impact assessments. An independent process by which companies can systematically identify, predict and respond to the potential human rights impacts of a business activity taking into account who is affected, the company’s policy and procedures and the business sector in which it operates.
 - h. **Community risk assessment:** Conduct community risk assessments – an assessment of community human rights risks that is usually conducted by an independent third party.

¹⁶ One tool is the ‘Guide to Human Rights Impact Assessment and Management’ that was published in 2010 by the International Business Leaders Forum, International Finance Corporation and UN Global Compact. Available at: www.unglobalcompact.org/library/25

STEP 3: ACT

ACT TO TACKLE SLAVERY

The third step of implementing a UNGP approach is to develop an action plan either to reduce the risks of forced labour occurring or to tackle cases of forced labour where they are identified.

Businesses that have assessed their supply chain, understood their risks and assessed those risks in detail will need to take corrective actions to address any issues identified as well as to prevent future issues occurring. The actions a business takes should focus on working with high- and medium- risk suppliers whilst continuing to engage low risk suppliers. Businesses should explore targeted collaborations with government, trade unions, industry bodies and/or civil society groups when addressing systemic issues, in order to minimise any gaps and reduce the likelihood of future risks.

The checklist below is intended as a recommended plan of action that a business can take in response to the risks identified in Step 2. The extent to which the points are used will depend on the size of the business and the risks associated with its supply chain.

STEP 3 ACT – DEVELOP AN ACTION PLAN TO TACKLE CASES OF SLAVERY WHERE THEY ARE IDENTIFIED		TICK IF DONE
28	: Based on the findings of your risk assessments, develop an action plan for high-, medium- and low-risk suppliers.	
29	: Implement a plan to remedy the situation/s where worker exploitation has been identified in your supply chain (see Step 4 below), ideally with support from the local government and a competent local organisation that can verify progress.	
30	: Team up with other relevant organisations such as customers, competitors, suppliers, business associations, unions or public authorities to identify, report and/or tackle possible cases of slavery or human trafficking and reduce the cost of identifying and addressing issues. This may include engagement in multi-stakeholder initiatives, such as Stronger Together.	
31	: Establish an easily accessible process and system for reporting complaints and violations. Your system could include a public email address or phone line for whistleblowers. It should allow victims to report violations confidentially to a qualified, independent third party. You should consider outsourcing the service to an impartial and reputable organisation, or partner with others in your sector to develop one.	
32	: Establish a process for responding to complaints or reported violations. Consult with the stakeholder groups who will use this process on the design and performance of the mechanism. Focus on dialogue as a means to address and resolve grievances.	
33	: Develop a process to work with suppliers (direct or indirect) found to be in violation of applicable regulations and/or the company's standards, such as its Code of Conduct.	
34	: Develop a process and criteria to sever relationships with non-compliant suppliers in the event that remedial actions are persistently unsuccessful.	

- 35 Communicate these processes internally to all staff and to suppliers and other key third party actors in the required languages.
- 36 Review your purchasing practices to understand the effect of your terms and conditions on your suppliers' ability to recruit and employ labour legally. For example, short order times (orders that are more than the supplier can produce), or unsustainable prices that do not enable a supplier to meet legal requirements on wages and benefits.
- 37 Consider reducing the number of suppliers you source from to allow for the development of long-term business relationships and increased leverage, openness and cooperation.
- 38 Include human rights performance in incentives for suppliers and find innovative means to reward supplier good practice. Favour suppliers that operate transparently, have a good reputation, and can demonstrate sufficient capacity and good workplace practices, including mature industrial relations.
- 39 Improve supplier appointment/recruitment processes by training procurement specialists on identifying the risk factors of forced labour during the tender process.
- 40 Update performance standards for procurement and technical staff to ensure social targets are evaluated alongside commercial deliverables.
- 41 Support and train suppliers to understand forced labour and modern slavery; the risks they face to their business and how to prevent issues occurring.
- 42 Share straightforward guidance for preventing forced labour with smaller suppliers including agriculture suppliers.
- 43 Establish ongoing monitoring mechanisms to detect violations of labour standards.
- 44 Work with supplier relationships where they are not meeting your human rights standards of conduct to put an action plan in place to work towards meeting the standards.
- 45 Use information from your assessments of suppliers to understand the circumstances that make workers in your supply chain most vulnerable to exploitation. Build this information into your future strategy.



STEP 4: PROVIDE REMEDY

PROVIDE REMEDY FOR MODERN SLAVERY VICTIMS

The fourth step of implementing a UNGP approach is to develop appropriate methods of remediation for victims of slavery and human trafficking.

Forced labour and human trafficking are crimes under international law. A suspected case of forced labour should be dealt with immediately, effectively and comprehensively.

Remedial measures¹⁷ should include:

- **Restitution** – Judicial or other methods to restore the victim to the original situation before the abuses occurred. This may include: following due legal processes to prosecuting those responsible for the abuses; restoration of employment; payment of unpaid wages or, repatriation, if desired by the worker.
- **Compensation** – Providing financial or non-financial compensation that is appropriate and proportionate to the gravity of the violation, including physical and mental harm, and consideration of lost opportunities, such as employment (loss of earnings) and benefits, if relevant.
- **Rehabilitation** – Including offering victims medical, physiological and psychological care, where relevant, access to legal and social services, and retraining and reintegration into the labour market and the community.
- **Satisfaction and guarantee of non-repetition**¹⁸ - A public apology by a business or its supplier may be required to adequately acknowledge the violation and accept responsibility. Businesses should also identify the steps required to prevent future violations, which may require an analysis of root causes.

Businesses should cooperate with public or non-governmental victim service providers with expertise in supporting victims of forced labour and with elected worker representatives, where possible.

In some cases, businesses may have limited leverage and power to resolve issues that arise from the actions of suppliers or business's partners. Collaboration with others who have the same interests may be required to resolve the issue and prevent the issue from re-occurring.

The UNGP outlines effectiveness criteria for non-judicial remedial actions a business undertakes when abuses are found. Such mechanisms should be: legitimate, accessible, predictable, equitable, transparent and provide a mechanism of continuous learning for the business and its suppliers.¹⁹

The checklist below outlines potential steps that businesses can take to implement remedial actions where violations of human rights are found in their supply chains. Businesses will need to review the points and determine what is appropriate for their company and its supply chain.

¹⁷ Office of the United Nations High Commissioner for Human Rights, 2005. *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*. Available at: www.ohchr.org/EN/ProfessionalInterest/Pages/RemedyAndReparation.aspx

¹⁸ Gallagher, A., 2010. *The right to an effective remedy for victims of trafficking in persons: a survey of international law and policy*. Available at: www.ohchr.org/Documents/Issues/Trafficking/Bratislava_Background_paper1.pdf

¹⁹ Office of the United Nations High Commissioner for Human Rights, 2011. *Guiding Principles on Business and Human Rights: implementing the United Nations "Protect, Respect and Remedy" framework*. Available at: www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

STEP 4 REMEDY – DEVELOP APPROPRIATE METHODS OF REMEDIATION FOR VICTIMS OF SLAVERY

TICK IF DONE

46. Conduct an initial assessment of the suspicions/allegations to ensure that your business has sufficient information to understand the exploitation discovered and to act to remedy it.
47. Implement your company's process for responding to complaints or reported violations. Ascertain if suppliers are implicated in the violation. Provided they are not, work with them to:
- a. Protect and support at risk individuals and protect their identities
 - b. Report violations to the relevant authorities, where they are trusted
 - c. Capture and protect evidence about the violations under the lead of a competent trusted manager (SEDEX Guidance on Operational Practice and Indicators of Forced Labour guidance available at www.stronger2gether.org)
 - d. Gather information from those affected on possible remedial steps (see Remedy Tool available at www.stronger2gether.org)
 - e. Correct the situation for the victim(s) which may involve restitution, compensation, rehabilitation or satisfaction
 - f. Contribute to programmes and projects to assist victims through vocational training and other appropriate measures.
48. Review the efficacy of remedial steps taken over a suitable time period by gathering anonymous feedback from victims and other stakeholders.
49. Provide feedback to suppliers on the remediation process and steps required to stop violations re-occurring.
50. Draft communication for workers and other third party contractors clearly acknowledging their right to pursue other forms of remedial action, at any stage in the process, beyond the company grievance mechanism provided. Ensure this message is communicated in the language spoken by the workers. Include full contact details of local enforcement agencies and victim support helplines and information on how workers can contact them should they need to.

STEP 5: MONITOR

MONITOR PROGRESS IN TACKLING SLAVERY

The fifth step of implementing a UNGP approach is to track and record the progress of a business's due diligence efforts.

Incorporating regular monitoring of progress towards agreed improvement measures gives confidence in a business's commitment to improving standards in its supply chain. Businesses should consider tracking efforts, using tools and indicators that are already used to manage suppliers, including complaints and feedback systems.

STEP 5 MONITOR – TRACK AND RECORD PROGRESS		TICK IF DONE
51	Establish a mix of quantitative and qualitative indicators for measuring your efforts to reduce, prevent and remedy negative impact. These may include: a. Quantitative indicators i. Supplier risk rating - change over time ii. Supplier spend versus risk rating - change over time iii. Suppliers that have provided written acknowledgement committing to (1) uphold standards, (2) submit to company monitoring and (3) collaborate in remediation iv. Audits performed – percentage of suppliers audited v. Audit outcomes and closure of corrective actions vi. Proactive projects and collaborations to prevent and address violations vii. Compensation expenditure – change over time viii. Suppliers trained ix. Suppliers that have grievance company mechanisms in place x. Non-compliance reports and number/percentage that have been resolved b. Qualitative indicators i. Suppliers' staff surveys ii. Victims feedback on outcomes of complaints and efficacy of grievance procedures and whistleblowing procedures iii. Stakeholder feedback on efficacy of forced labour strategy iv. Training and capacity-building of suppliers about modern slavery issues, measuring changes in awareness of risk v. Visibility, leverage and oversight of suppliers in relevant supply chains	
52	Consult with stakeholders to ensure indicators accurately reflect the information that needs monitoring.	
53	Establish methods for measuring the information you require at least annually. Communicate requirements to suppliers.	
54	Collect data.	
55	Analyse data to understand trends and root causes.	

STEP 6: COMMUNICATE

COMMUNICATE PROGRESS IN TACKLING SLAVERY

The final step of implementing a UNGP approach is to communicate openly to stakeholders about progress made and the challenges faced.

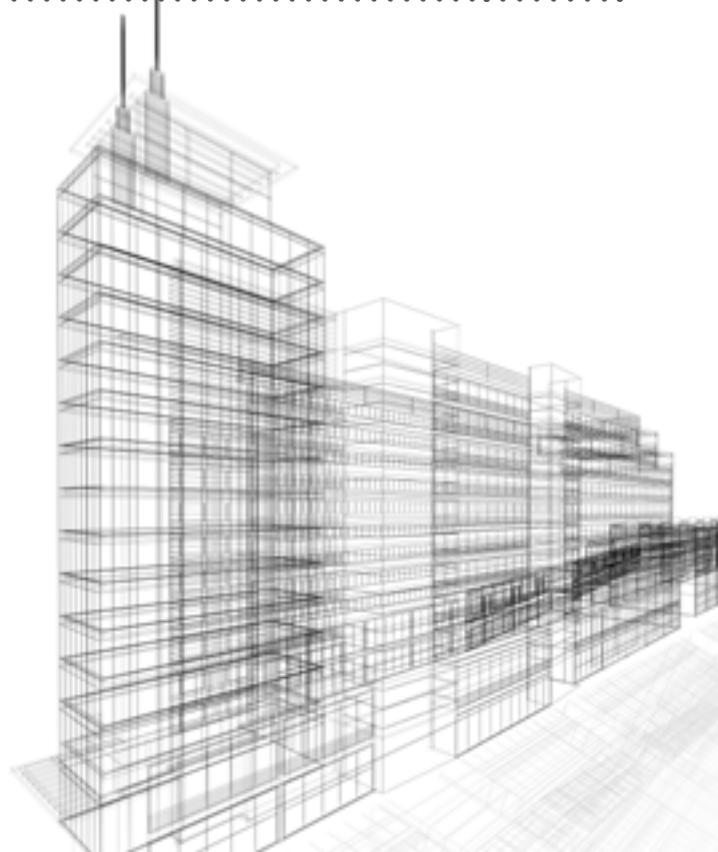
Businesses should identify what information to share, and how to share it, with internal and external stakeholders. Open communication contributes to increased trust and encourages cooperation.

General principles to apply should include:

- Keeping information as up to date as possible
- Communicating via appropriate channels
- Focussing on actual activities and their impact
- Being open about challenges and efforts to address the challenges
- Using real voices to provide authenticity, and
- Not compromising or posing a risk to affected stakeholders, such as workers, suppliers and local communities.

The most relevant options for communication will vary depending on the size of the business and the type and amount of information to be communicated.

STEP 6 COMMUNICATE – TELL PEOPLE WHAT YOU HAVE DONE		TICK IF DONE
56	: Identify what information you want to share and how you want to share it with stakeholders.	
57	: Devise a media plan, which should include investor newsletters, stakeholder meetings, annual reports and social media updates.	
58	: Communicate regularly, openly and honestly about your risks and challenges.	
59	: Report the extent to which the measures you have implemented have been successful, referring to quantitative and qualitative indicators as evidence.	



SECTION D

APPENDICES

Appendix 1: Tackling Modern Slavery in the Construction Sector Programme

Appendix 2: Online E-learning modules

Appendix 3: Overview of Stronger Together guidance and templates available

APPENDIX 1

TACKLING MODERN SLAVERY IN THE CONSTRUCTION SECTOR PROGRAMME



**stronger
together**

tackling modern slavery in supply chains

**Stronger Together is a multi-stakeholder initiative aiming to
reduce modern slavery,
particularly hidden forced labour, labour trafficking and other
third party exploitation of workers**

Have you implemented effective management systems to tackle modern slavery in your workplace and supply chain?

Stronger Together provides guidance, resources and a network for employers, labour providers, workers and their representatives to work together to reduce hidden labour exploitation.

Join the Stronger Together network at www.stronger2gether.org now to:

- » Download free resources including toolkits, video, posters, leaflets and more
- » Access best practice training and support to tackle modern slavery in supply chains
- » Book onto an interactive training workshop. "Tackling Modern Slavery in Construction" workshop available from 2017.

All construction sector materials will be made available in 2017.

Please contact us for more information at:

Email info@stronger2gether.org Telephone 01276 919090 Web www.stronger2gether.org

CONSTRUCTION STAKEHOLDER PARTNERS



APPENDIX 2

ONLINE E-LEARNING MODULES



tackling modern slavery in supply chains

TACKLING MODERN SLAVERY IN BUSINESS ONLINE E-LEARNING MODULES

CONTEXT

Stronger Together online e-learning courses focus on the crime of 'forced labour' as defined in the UK Modern Slavery Act 2015.

The courses, produced in conjunction with Eukleia training, provide frontline staff with the awareness and tools necessary to help identify and tackle this hidden exploitation of workers with a key role in spotting the signs of modern slavery. These e-learning modules offer a low-cost solution and enable your staff to work through training at their own pace and location.

UNDERSTAND THE RESPONSIBILITIES AND BEST PRACTICE ASSOCIATED WITH TACKLING MODERN SLAVERY IN BUSINESS

CONTENT

The courses explain:

- + What modern slavery is
- + The sectors most at risk
- + How learners can spot the signs of hidden labour exploitation
- + What learners can do personally to protect vulnerable individuals from exploitation.

It gives clear guidance on what learners can do to help by describing signs to look out for and explaining what businesses should - and should not – do if they believe someone may be being exploited. The message of practical guidance is supported by video and animation to emphasise the importance of helping to stop labour exploitation.

AUDIENCE

There are four versions of the course "Tackling Modern Slavery in Business":

- + General UK version
- + International version
- + For first line supervisors working for UK employers in any at-risk sector
- + For frontline recruiters who work in UK employment businesses, labour providers and any employers in sectors that are targeted by exploiters forcing others to work).

LEARNING OUTCOMES

By the end of the course, the learner will:

- + Understand what modern slavery is, forced labour and hidden labour exploitation
- + Know what they can do to help
- + Know how to recognise the signs that someone may be being exploited, and how to respond.

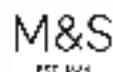
COURSE DURATION AND ASSESSMENT

The course will take approximately 30 minutes to complete. The course does not contain a formal assessment, but there are interactive exercises throughout to check and reinforce learners' knowledge.

PRICING

The pricing model for the online recruiter and supervisor Tackling Modern Slavery modules is determined by the number of people to be trained and whether an existing Learning Management System (LMS) is in place.

For a free trial request, further information on these online e-learning modules and for the full range of Stronger Together Tackling Modern Slavery training solutions please visit www.stronger2gether.org/training/ or email info@stronger2gether.org.



Web: www.stronger2gether.org

Email: info@stronger2gether.org

Tel: 01276 919090

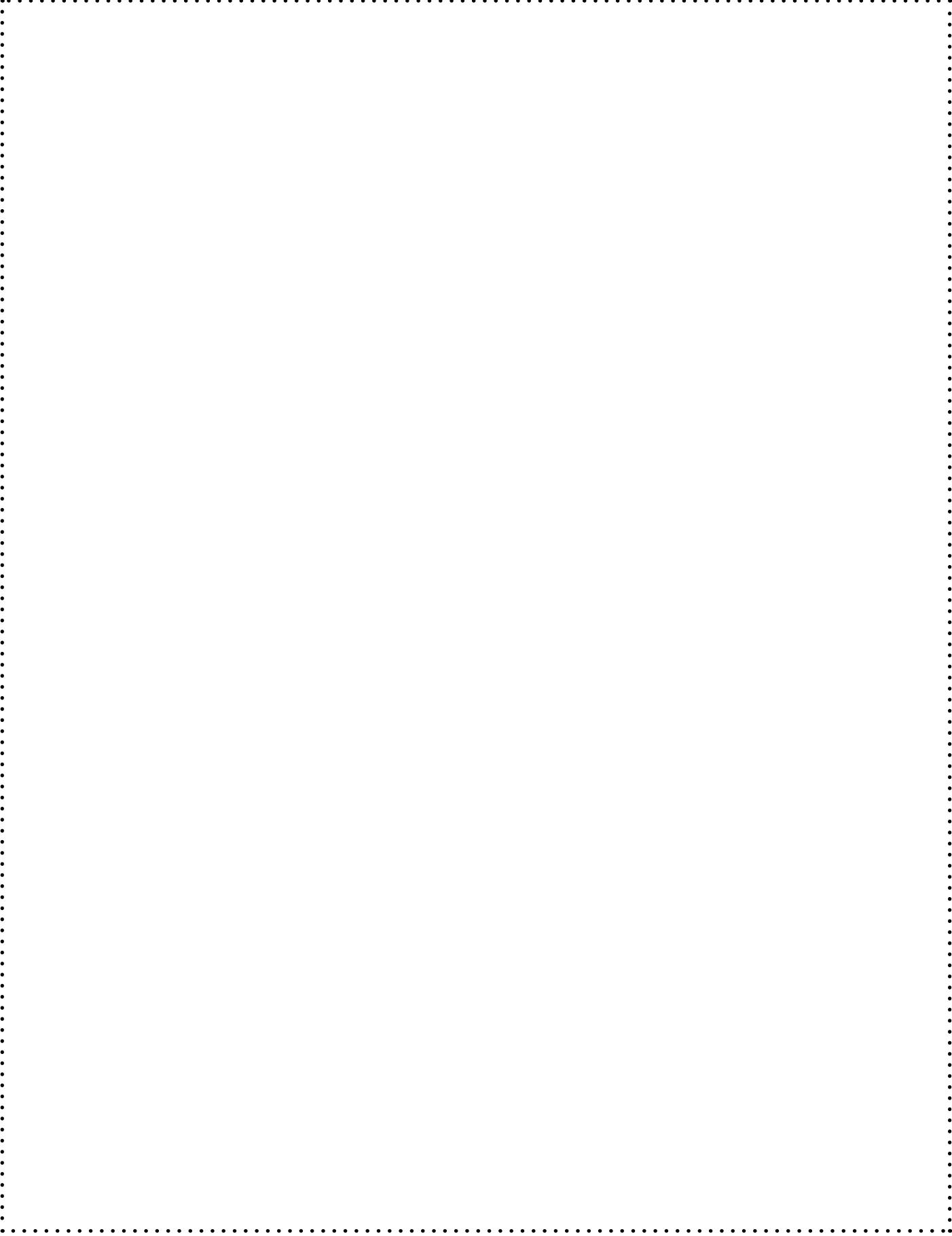
APPENDIX 3

OVERVIEW OF STRONGER TOGETHER GUIDANCE AND TEMPLATES AVAILABLE

The following documents are available on www.stronger2gether.org:

1. Checklist for employers and labour providers
2. Template policy on preventing hidden labour exploitation
3. Template recruiter compliance principles
4. Template worker questionnaire
5. Sample worker interview questions
6. Template record of potential third party exploitation
7. Template policy on bribery and corruption
8. Template risk screening tool
9. Template risk scorecard for supply chains
10. Template policy on ethical trade
11. Template policy on forced labour
12. Template policy on responsible use of labour providers in supply chains
13. Ethical trade and human rights self-assessment questionnaire for suppliers
14. Template for conducting supplier visits
15. Template for remedy tool

NOTES



NOTES

SUPPORTING YOUR BUSINESS IN TACKLING FORCED LABOUR

**stronger
together**
tackling modern slavery in supply chains

THE CHALLENGES



More than **20.9 MILLION**
PEOPLE in forced labour globally



Behind every statistic is a person...
held in forced labour



Growing statutory and civil law,
supply chain and moral imperatives



Increasing human rights benchmarking of
companies is influencing clients, customers,
NGOs, investors and shareholders

WHO WE WORK WITH

HIGH RISK INDUSTRIES



FOOD &
DRINK



RETAIL



AGRICULTURE



CONSUMER
GOODS



CONSTRUCTION



FISHING &
MARITIME

BUSINESSES



INTERNATIONAL
BUSINESSES



LABOUR
PROVIDERS



SUBCONTRACTORS



SUPPLIERS

DEPARTMENTS



CEO
SENIOR MANAGEMENT
HUMAN RESOURCES
PROCUREMENT
RESPONSIBLE SOURCING
CSR/ETHICAL TRADE
COMPLIANCE
FRONTLINE STAFF

THE JOURNEY WITH STRONGER TOGETHER



PRAGMATIC & FREE RESOURCES

- 1 Toolkits
- 2 Training & Awareness Videos
- 3 Worker Posters & Leaflets
- 4 Templates & Checklists



TRAINING

- 1 Tackling Forced Labour in Businesses
- 2 Tackling Forced Labour in Global Supply Chains
- 3 Bespoke, In-house Training
- 4 UK & Global E-Learning



PROGRESS MONITORING & REPORTING

- 1 Online Supplier Assessment
- 2 Ongoing Engagement Across Supply Chains
- 3 Expert & Peer-to-Peer Support Network
- 4 Involvement In Programme Can Be Referenced In Your Human Rights Reporting



CONSULTING

- 1 Strategy & Policy Development
- 2 Training & Capacity Building
- 3 Supply Chain Mapping, Identifying & Assessing Risk
- 4 Monitoring & Communicating Effectiveness

GET INVOLVED

Contact us today to find out more information:

+44 (0)1276 919090

info@stronger2gether.org

www.stronger2gether.org

PROJECT SPONSORS



BENEFITS

Reduce workers' vulnerability to exploitation

Promote a safe, non-exploitative working environment

Improve communication within your supply chain

Support according to your business' needs and learning at your pace

Build and demonstrate leadership

stronger together

tackling modern slavery in supply chains

Stronger Together is a multi-stakeholder initiative that brings together companies, labour providers, industry associations, NGOs and other key parties to address and help businesses tackle modern slavery.

Stronger Together takes a collaborative approach to developing new strategies to support business in addressing modern slavery risks based on the corporate responsibility to respect human rights advanced in the UN Guiding Principles on Business and Human Rights.

w: www.stronger2gether.org

e: info@stronger2gether.org

t: +44 (0) 1276 919090

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UNDER CONSTRUCTION