

Business Services Association  
**Modern Slavery Council**

**TACKLING  
MODERN  
SLAVERY  
IN UK  
SERVICE AND  
INFRASTRUCTURE  
PROJECTS  
SECTORS  
TOOLKIT**

June 2023



This document has been produced by the Business Services Association's Modern Slavery Council. The work of the Council is driven by a Steering Committee made up of colleagues from Amey, Balfour Beatty, BSA, CBRE, City FM, OCS, Serco, and Sodexo.

The Toolkit has been produced in partnership with Slave-Free Alliance, Action Sustainability, Romanac Consulting, Scotland Against Modern Slavery, and the Supply Chain Sustainability School.

The Modern Slavery Council Steering Committee is very grateful to the Home Office and the Cabinet Office for their support in the development of the Toolkit.

The information provided in this 'Toolkit' does not, and is not intended to, constitute legal advice; instead, all information, content and materials available in this document are for general informational purposes only. This document contains links to other third-party organisations, resources and documents. Such links are only for the convenience of the reader; the BSA and its members do not endorse the contents of third-party sites.

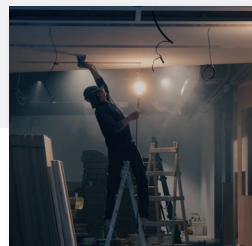
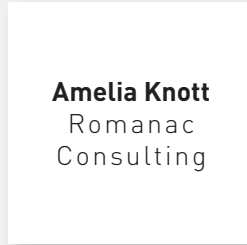
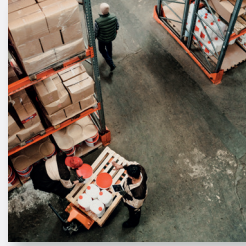
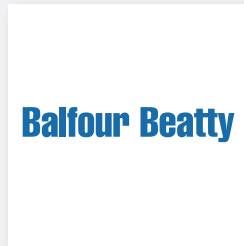
Section 1

## Modern slavery toolkit



TACKLING  
MODERN SLAVERY  
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INFRASTRUCTURE  
PROJECTS  
SECTORS TOOLKIT

## Section 2 Contributors



## Section 3

# Members

BSA Modern Slavery Council Steering Committee members:

- Amey
- Balfour Beatty
- Business Services Association
- CBRE
- City FM
- OCS Group
- Serco
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The Toolkit has been produced in partnership with:

- Slave-Free Alliance
- Scotland Against Modern Slavery
- Supply Chain Sustainability School
- Action Sustainability

The Toolkit represents the collective efforts of all organisations on the Service and Infrastructure Project Providers Modern Slavery Council administered by the BSA.

## Section 4

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## Section 5

# Introduction

This Toolkit aims to provide businesses and voluntary, community and social enterprise (VCSE) organisations within the service and infrastructure projects sector with a best practice guide on how to address the risks of Modern Slavery within their own structures and their supply chains.

Practical guidance is included for staff across all areas of business including:

- human resources;
- procurement;
- operations and technical; and,
- corporate responsibility and sustainability.

The Toolkit also includes:

- an introduction to Modern Slavery;
- the risks of Modern Slavery within the service and infrastructure projects sector;
- practical guidance for business on implementing effective management systems to prevent, detect and report Modern Slavery; and,
- additional resources.

The audience for this guide is both large and small businesses and VCSEs. Whilst some organisations may already have measures in place, this guide can be used to help review the effectiveness of existing policies and procedure. It can also guide smaller businesses who may not be required by law to comply with the Modern Slavery Act but who may wish nevertheless to develop a robust strategy in line with the Act. This guidance may also be issued to organisations within businesses' supply chains.

The Modern Slavery Act<sup>1</sup>, passed by the UK Government in 2015, is the first piece of UK legislation that focuses on the prevention of slavery and servitude. Under the Act, businesses must prepare a slavery and human trafficking statement for each financial year if the business supplies goods and services and has a total turnover of over £36 million<sup>2</sup>. Increasingly, however, many key suppliers and subcontractors with lower turnovers are being asked to produce statements.

The information contained within the statement should include:

- information related to the business' structure and supply chains;
- policies relating to slavery and human trafficking;
- due diligence process in its business and supply chain;
- areas of business at risk of Modern Slavery;
- how the business ensures Modern Slavery is not taking place; and,
- training available to staff.

Due diligence legislation and guidance affecting international supply chains is expanding globally, including the European Parliament's Corporate Sustainability Reporting Directive<sup>3</sup>, Germany's Supply Chain Due Diligence Act<sup>4</sup>, and the United States' Uyghur Forced Labour Prevention Act<sup>5</sup>. Investors are increasingly driving the agenda with reference to environmental social and governance (ESG) standards, demonstrating that organisations' clients, investors, customers, and stakeholders are aware of the need to deliver on increased due diligence and transparency in this area and are keen to do so.

All of the above demonstrate a business case for organisations' efforts beyond the obvious moral imperative. Together, as a sector, we can tackle Modern Slavery in supply chains.

Additional factors to consider include EU Exit and immigration regime changes which naturally affect the rules which apply. The Cabinet Office has recently published a Procurement Policy Note which compels all Government departments to identify and manage Modern Slavery risks in both new procurement and existing contracts<sup>6</sup>. Furthermore, rising cost of living may compound worker vulnerability. Organisations across the UK in the services and infrastructure sectors for a variety of reasons face supply chain disruption, changing costs of goods, services, and energy, and labour supply shortages.

1. U.K. Parliament, 2015. Modern Slavery Act 2015. (30) Online: <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

2 Home Office, 2021. Guidance: Publish an annual Modern Slavery statement. Online: <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>

3 European Parliament and Council of the European Union, 2022. Directive (EU) 2022/2464, as regards corporate sustainability reporting. (Document 32022L2464). Online: <https://eur-lex.europa.eu/legal-content/EN/TXT/>

4 German Parliament, 2021. Act on Corporate Due Diligence Obligations in Supply Chains. (2959). Online: <https://eur-lex.europa.eu/legal-content/EN/TXT/>

5 U.S. Customs and Border Protection, 2021. Uyghur Forced Labour Prevention Act. (H.R. 1155). Online: <https://www.congress.gov/bill/117th-congress/house-bill/1155/text>

6 Cabinet Office, 2023. Procurement Policy Note – Tackling Modern Slavery in Government Supply Chains. Online: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1135513/PPN-02\\_23-Tackling-Modern-Slavery-in-Government-Supply-Chains-.docx.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1135513/PPN-02_23-Tackling-Modern-Slavery-in-Government-Supply-Chains-.docx.pdf)

## Section 6

# What is modern slavery?

Modern Slavery is an umbrella term which encompasses the acts of slavery, servitude, forced or compulsory labour as well as human trafficking. It ultimately involves one person or group of persons depriving another person of their freedom for their own personal or commercial gain.

Modern Slavery takes different forms in the UK, varies by region and changes over time, but for the purposes of this Toolkit, can be broadly grouped into three categories<sup>7</sup>:

1. labour exploitation, involving coercion and low pay, poor working conditions and/or excessive wage deductions. The individual cannot leave under the threat of penalty, including physical punishment, financial abuse, or retention of identity papers;
2. trafficking of people involving 'the 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 of a position of vulnerability or of the living or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation'<sup>8</sup>; and
3. bonded labour or debt bondage involving taking a loan or an advancement of wages, such as a recruitment fee, whereby the person is forced to work to pay off the debt.

It is important to note that child labour is beyond the scope of this particular Toolkit.

The most recent National Referral Mechanism (NRM) statistics indicate that there were 16,938 potential victims of Modern Slavery referred to the Home Office in 2022, representing a thirty-three percent increase compared to 2021 and the highest annual number since the NRM began in 2009<sup>9</sup>.

UK nationals are also at risk of Modern Slavery, especially vulnerable people from disadvantaged backgrounds. Many victims, however, are foreign nationals; NRM data shows that in 2022, the most common nationalities of Modern Slavery victims were Albanian, British, and Eritrean<sup>10</sup>. Foreign nationals' lack of familiarity, network, and understanding of the language can be exploited, as well as a fear of deportation<sup>11</sup>. Cases of Modern Slavery and forced labour are present in every region of the UK but are most prevalent in Greater London and the West Midlands<sup>12</sup>.

It is important to understand why victim-survivors cannot always walk away. Victim-survivors of Modern Slavery may refuse to leave due to threats, violence, coercion, deception or abuse of power<sup>13</sup>. They may have had their documentation, methods of communication with networks, and earnings removed, and may perceive themselves to be bonded by debt.



7. Home Office, 2017. Modern slavery awareness booklet. Online: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/655504/6.3920\\_HO\\_Modern\\_Slavery\\_Awareness\\_Booklet\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_HO_Modern_Slavery_Awareness_Booklet_web.pdf); Home Office, 2017; Research and analysis: A typology of Modern Slavery offences in the UK. Online: <https://www.gov.uk/government/publications/a-typology-of-modern-slavery-offences-in-the-uk>; Unseen, 2021. Types of Modern Slavery. Online: <https://www.unseen.org/about-modern-slavery/types-of-modern-slavery/>

8. United Nations Office for Drugs and Crime, 2000. Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime. Preamble. Online: [https://www.unodc.org/res/human-trafficking/2021the-protocol-tip\\_html/TIP.pdf](https://www.unodc.org/res/human-trafficking/2021the-protocol-tip_html/TIP.pdf)

9. Home Office, 2023. Modern Slavery: National Referral Mechanism and Duty to Notify statistics, end of year summary 2022. Official statistics. Online: <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022>

10. Ibid.

11. Stop the Traffik, 2019. "Why can't victims of trafficking just walk away?". Online: <https://www.stophetraffik.org/cant-victims-trafficking-just-walk-away/>

12. Verisk Maplecroft, 2018. Risks of Modern Slavery in UK highest in West Midlands, London and Greater Manchester. Online: <https://www.maplecroft.com/insights/analysis/risks-of-modern-slavery-highest-west-midlands-london-greater-manchester/>

13. International Labour Organisation, 2022. 50 million people worldwide in Modern Slavery. Press release. Online: [https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_855019/lang-en/index.htm#:~:text=Modern%20slavery%2C%20as%20defined%20for,deception%2C%20or%20abuse%20of%20power](https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_855019/lang-en/index.htm#:~:text=Modern%20slavery%2C%20as%20defined%20for,deception%2C%20or%20abuse%20of%20power)



## Section 7

## The service and infrastructure projects sector



The services and infrastructure projects sector covers a wide range of operations including at the latest estimate, over 360,000 cleaning jobs; 280,000 jobs in property repair and maintenance; and around 200,000 security roles<sup>14</sup>.

This sector is people-focused and decentralised across the UK. As a large employer with diverse supply chains, the sector has a particular responsibility in this area. It represents people with a very wide range of skill and salary levels, from entry level to boardroom. Especially at entry level, however, there are particular risk factors of which all providers need to be aware, and include:

### Out of Sight

Facilities management, in particular, holds a workplace together and is a critical part of the national infrastructure. Many tasks, however, are done behind the scenes - often not in public view, invisible to the customer, or at night when everyone else has gone home. This means organisations need to check workers are being treated well, have the right PPE and are given regular breaks. There must be a conscious effort to spot potential victims of Modern Slavery so that people aren't exploited just because they are away from the public eye.

### Skills and income

The service and infrastructure projects sector employs a wide range of skills but at entry level, roles may be unskilled or low-skilled with training provided in-house. In these cases, workers may arrive in their posts without pre-existing training or employment and therefore the need to produce documentary evidence of this.

### Routes to Employment

Given the range of roles within this sector, there are various routes to employment including direct employment, temporary/contingent labour and indirect or subcontracted workers.

### Fluctuating Requirements

Demand for service and infrastructure projects fluctuate which leads to shifting labour requirements and the use of recruitment agencies. Transparency in how workers are recruited, vetted and paid, and under which terms and conditions, is critical for organisations.

### Diverse Supply Chains

The sector involves a large number of SMEs, particularly in the supply chains of larger organisations. The recent, and welcome, emphasis on equitable partnership working to build up supply chains in local communities, benefitting large and small companies alike, provides an opportunity for large providers to use their knowledge, experience and resources to support smaller organisations to put the right procedures in place to tackle Modern Slavery. It also means, however, that there is a responsibility for larger organisations to be aware of procedures that exist much further down the supply chain and possibly in supply chains outside the UK in cases where services rely on products such as food or raw materials.

<sup>14</sup>. Oxford Economics, Business Services Association, 2013. The UK market for business services: The national, regional and constituency picture in 2013. Online: <https://www.bsa-org.com/wp-content/uploads/2017/04/OE-BSA-report.pdf>

## Section 8

## High risk areas within the sector



Risk is present across the labour practices of different subcontractors and trades on site, as well as across the supply chain including risk in the manufacturing and raw materials of goods supplied into various facilities management, services, and infrastructure projects.

Once the risks have been identified and assessed, businesses and VCSEs need to implement effective actions, track and monitor the approach, communicate and report effectively, and ensure effective grievance mechanisms and remedy processes.

Again, it is important to stress that victims of Modern Slavery can belong to any nationality, gender identity, age group, and region of the U.K.. The data below on high risk areas is indicative only, and taken largely from 2020 Gangmasters and Labour Abuse Authority data, and 2017 Home Office data. Where there is no complete data, risk factors are taken from organisations' experiences directly.

### Cleaning

#### Characteristics of incidents<sup>15</sup>:

- Exploiters providing accommodation usually a shared residential property.
- Workers' wages withheld.
- Workers paid below the National Minimum Wage.
- Employees working excessive hours with inadequate breaks and little/no rest between jobs.

#### Job factors:

- Employees often work alone.
- Work often takes place outside of standard office hours.
- Workers are often lower paid and/or skilled.

#### Location<sup>16</sup>:

- The most frequently reported incident location is London.

#### Victim profile<sup>17</sup>:

- Female.
- Bulgarian or unknown Eastern European nationality.

#### Victim vulnerabilities<sup>18</sup>:

- Migrants who appear to lack the necessary documents required under the UK's immigration regulations are particularly vulnerable in this sector.

<sup>15, 16, 17, 18.</sup> Gangmasters & Labour Abuse Authority, 2020. Industry profile: Cleaning. Online: <https://www.gla.gov.uk/who-we-are/modern-slavery/industry-profile-cleaning-2020/>

## Construction and Mechanical & Electrical Services

### Characteristics of incidents<sup>19</sup>:

- Provision of substandard/overcrowded accommodation including residential properties and building sites.
- Payment below National Minimum Wage.
- Individuals working without genuine CSCS certificates, relevant training or previous experience.
- Workers transported to and from work.

### Job factors:

- Ongoing labour shortages which are increasingly supplemented by temporary migrant labour or characterised by sudden injections of workers into the workforce such as seasonal staff or preparation for major events.
- Health and safety risks are inherently present and can be exacerbated by lack of PPE and/or understanding of regulations and safety requirements.
- Complex contract lifecycles for major projects and many layers of subcontractors in the sector.

### Victim profile<sup>20</sup>:

- Male.
- Romanian or Albanian.
- Young.

### Vulnerabilities<sup>21</sup>:

- Migrants who appear to lack the necessary documents required under the UK's immigration regulations are particularly vulnerable in this sector.
- Those with difficulty communicating in English.

### Location<sup>22</sup>:

- Incidents are most frequently reported in London, South-East, Eastern and North-West.

19, 20, 21, 22. Home Office, 2017. Modern Slavery: resources for industry. Promotional material. Online: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/638768/FACTSHEET\\_Modern\\_Slavery\\_Construction\\_v2\\_WEB.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638768/FACTSHEET_Modern_Slavery_Construction_v2_WEB.PDF); Gangmasters & Labour Abuse Authority, 2020. Industry Profile: Construction. Online: <https://www.gla.gov.uk/who-we-are/modern-slavery/industry-profile-construction-2020/>; Independent Anti-Slavery Commissioner, 2022. Operation Cardinas and Beyond: Addressing exploitation risk in the construction sector. Online: [https://www.antislaverycommissioner.co.uk/media/1802/iasc-construction-report\\_april-2022.pdf](https://www.antislaverycommissioner.co.uk/media/1802/iasc-construction-report_april-2022.pdf)

## Food & Catering Services

### Characteristics of incidents<sup>23</sup>:

- Substandard or overcrowded residential property provided in lieu of wages.
- Non-payment of National Minimum Wage.
- Long working hours and inadequate breaks.

### Job factors:

- Employees often work alone or out of sight.
- Workers can be transient due to the seasonal nature of the industry (e.g. events).
- Workers often lower paid/lower skilled.

### Victim profile<sup>24</sup>:

- Both male and female workers have been identified.
- Victims are usually young.
- Romanian or Chinese nationals.

### Vulnerabilities<sup>25</sup>:

- Migrants who appear to lack the necessary documents required under the UK's immigration regulations are particularly vulnerable in this sector.
- Those with financial difficulties.
- Those with learning disabilities.

23, 24, 25. Gangmasters & Labour Abuse Authority, 2020. Industry profile: Food Service Industry. Online: <https://www.gla.gov.uk/who-we-are/modern-slavery/industry-profiles-food-service-industry-2020/>; Home Office, 2017. Modern Slavery: resources for industry. Promotional material. Online: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/638772/FACTSHEET\\_Modern\\_Slavery\\_Food\\_v2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638772/FACTSHEET_Modern_Slavery_Food_v2.pdf); Home Office, 2017. Modern Slavery: resources for industry. Promotional material. Online: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/638774/FACTSHEET\\_Modern\\_Slavery\\_Hospitality\\_v2\\_WEB.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638774/FACTSHEET_Modern_Slavery_Hospitality_v2_WEB.PDF)

## Grounds Maintenance

### Characteristics of incidents:

- Health and safety breaches occur with workers not provided with appropriate PPE, forced to pay for it out of their wages, and/or not dressed appropriately for the weather conditions.
- Workers are taken to and collected from work.

### Job factors:

- Employees often work alone.
- Workers are often transient due to the very seasonal nature of the industry.
- Some roles in the industry can be lower paid and/or skilled.

## Security

### Job factors:

- Employees often work alone.
- Much of the work takes place out of sight during long and/or unsociable hours.
- Ongoing labour shortages are increasingly supplemented by low-paid transient workers.
- There is a high risk of safety issues.
- Employees sometimes don't have access to basic facilities.
- It is important to note that an SIA (Security Industry Authority) licence is a legal requirement for anyone undertaking a private security role within the UK, and this provides additional checks including the applicant's right to work in the UK and whether they have relevant qualifications for the role.

## Waste & Recycling

### Characteristics<sup>26</sup>:

- Employees in shared housing frequently described as unsanitary and unsafe.
- Non-payment of National Minimum Wage.

### Job factors:

- Employees often work alone.
- Workers can be lower paid and/or skilled depending on the type of job.
- This industry varies between on-site activity (e.g. portering and cleaning) and indirect or out of sight activity (e.g. collection of waste, treatment at waste facility).

### Victim profile<sup>27</sup>:

- Male
- Romanian.

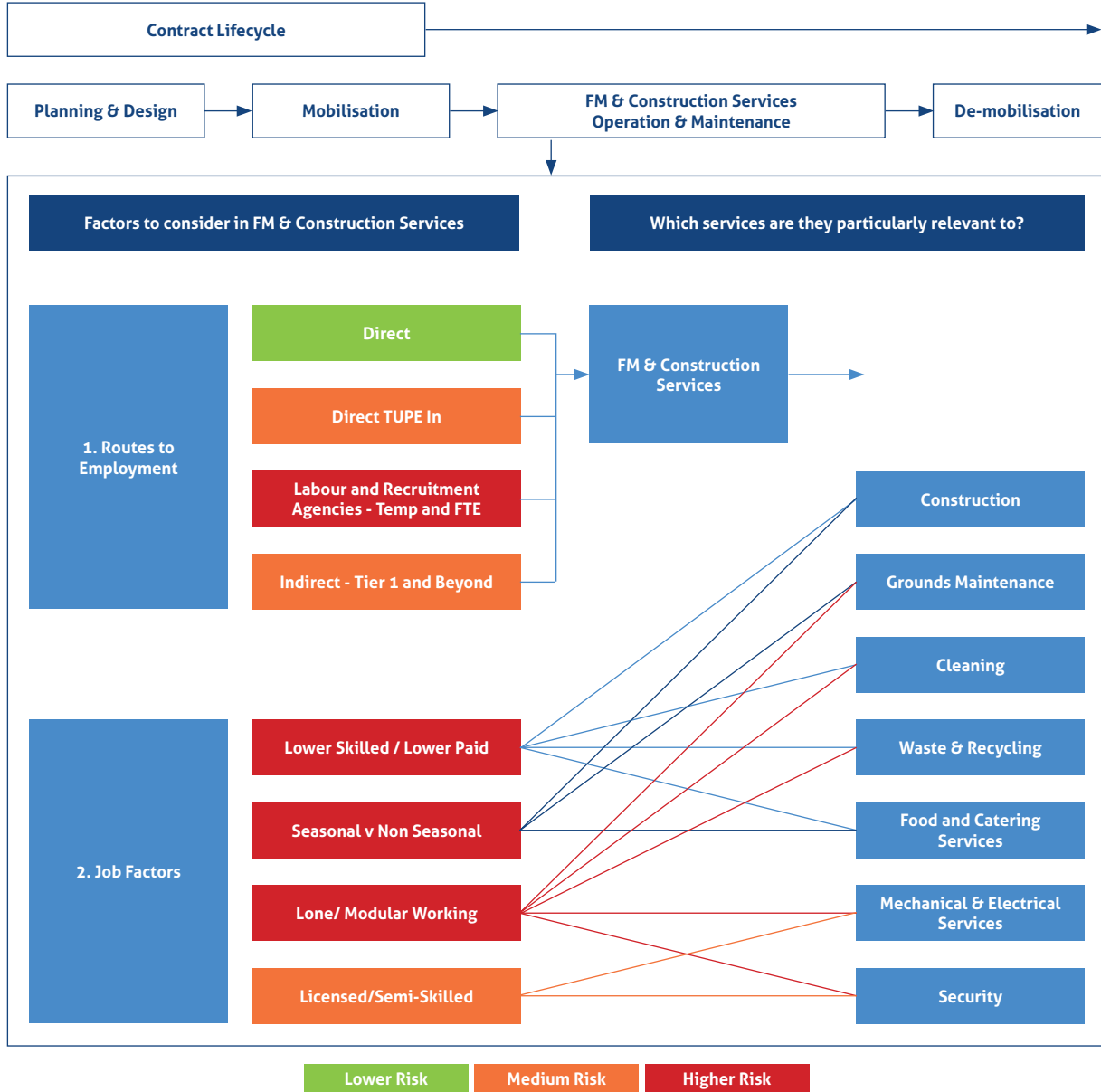
### Vulnerabilities<sup>28</sup>:

- Migrants who appear to lack the necessary documents required under the UK's immigration regulations are particularly vulnerable in this industry.
- Those who don't speak English have a compounded risk involving the use of equipment and safety.

26, 27, 28. IPHR Forum, 2021. Modern Slavery Toolkit: Waste & Recycling Sector. Online: <https://bit.ly/3eFRkzr>; Gangmasters & Labour Abuse Authority, 2020. Industry Profiles – Recycling and Waste Industry. Online: <https://www.gla.gov.uk/who-we-are/modern-slavery/industry-profiles-recycling-and-waste-industry-2020/>

Section 9

# Contract lifecycle



## Section 10

## Spotting the signs



HOPE FOR JUSTICE

As well as training people within your own organisation on how to spot the signs of Modern Slavery, colleagues should be trained to look for signs while on site visits, when visiting suppliers, and during other interactions with frontline or site-based staff.

Due to the hidden nature of Modern Slavery, as well as people's reluctance to come forward or inability to recognise themselves as victims, it can sometimes be difficult to identify potential cases.

Whilst there are no definitive indicators of Modern Slavery, here are some signs, to be considered within the context of other evidence, to help businesses and VCSEs identify a potential victim<sup>29</sup>:

### Physical Appearance

- Most victim-survivors are male, but not all: recent data shows that seventy-eight percent of victim-survivors were male while twenty-two percent were female<sup>30</sup>.
- Does the worker appear unkempt, dirty or malnourished? Are there any signs of the physical consequences of captivity or poor conditions, such as infections, anaemia, dental problems, fatigue, or disfigurements?
- Do they have any obvious injuries that appear to be the result of assault or inadequate working conditions? Do they have unclear explanations as to how these injuries were sustained?

29. Home Office, 2023. Modern Slavery: statutory guidance for England and Wales and non-statutory guidance for Scotland and Northern Ireland. Online: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims> ; Gangmasters & Labour Abuse Authority, 2023. Spot the signs. Online: <https://www.gla.gov.uk/who-we-are/modern-slavery/who-we-are-modern-slavery-spot-the-signs/> ; Stronger Together, 2019. Guidance Identifying Victims of Modern Slavery. Online: <https://www.stronger2gether.org/product/guidance-of-identifying-victims-of-modern-slavery/> ; Stronger Together, 2019. Monitoring Alert Flags = Checklist of potential indicators of worker exploitation. Online: <https://www.stronger2gether.org/product/monitoring-alert-flags-checklist-of-potential-indicators-of-worker-exploitation/>

30. Home Office, 2023. Modern Slavery: National Referral Mechanism and Duty to Notify statistics, end of year summary 2022. Official statistics. Online: <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022>

## Behaviour

- Does the worker seem withdrawn, or show fear or anxiety? They may have suffered acts of physical or psychological abuse or exploitation.
- Is the worker distrustful of authorities or management?
- Do they demonstrate an inability to regulate their emotions, such as signs of hostility, aggression, or difficulties with relationships?
- Does the worker go missing for periods of time?
- When the worker arrives to work, do they turn up alone or are they dropped off or picked up by another person?

## Documents and possessions:

- Does the worker lack travel documents, or do they appear inauthentic? Is someone else in possession of their passport, travel, or identity documents, or their contracts, bank information or health records?
- Are they afraid to reveal their immigration status?
- Do they know their home address? Does the worker have the same home address as (an) other employee(s)?
- Does the worker lack knowledge about the area in which they live?
- Do they have access to their earnings?
- Do they know about their rights as workers in the UK?

## Vulnerabilities

- Have you seen the worker with any personal possessions, such as money, a mobile phone, jewellery, or food?
- Are they a former victim?
- Are they homeless?
- Do they display signs of a drug or alcohol dependency?
- Do they have any underlying health factors, or have any pre-existing chronic medical conditions deteriorated?
- Do they show signs of financial hardship, such as debt or limited cashflow?
- Do they have weak social connections to friends or family? Do they show signs of loneliness?
- Do they have a criminal record?

The most common nationality referred to the NRM across the U.K. in Q2 2022 was Albanian, which accounted for twenty-seven percent of all potential victims, followed by UK, Eritrean, Sudanese and Vietnamese nationals<sup>31</sup>. It is crucial to note that victims can be from any nationality.

Whilst the list above highlights signs to look out for, it is important to remember not all signs will apply in every case, and these signs could be indicative of other issues. Each case should be considered on an individual basis, and if Modern Slavery (or any other issue affecting the welfare of the worker) is suspected, act immediately. If a worker has been identified as a victim of exploitation it is extremely important to take the correct next steps.

31. Home Office, 2023. Modern Slavery: National Referral Mechanism and Duty to Notify statistics, end of year summary 2022. Official statistics. Online: <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2022>

## Section 11

# What to do if you suspect someone is a victim of modern slavery

### Pre-emptive actions:

Businesses should appoint a Single Point of Contact (SPoC) for Modern Slavery at each site, so that there are always people who know that they take responsibility for any disclosures.

Companies should develop their own escalation processes which could include:

- emergency safeguarding, expense codes and accommodation policies for victims in the support interim;
- a whistleblowing policy; and,
- access to translation services.

In the construction sector specifically, companies may find it useful to:

- include how to spot the signs of Modern Slavery in site inductions for new staff;
- include safeguards against Modern Slavery as part of site visits and auditing processes; and,
- ensure site managers are aware of the signs of Modern Slavery as well as relevant policies and standards in the company.

### Immediate actions:

Safety, protection and support must always be the first priority.

If you suspect that somebody is in slavery, DO NOT automatically confront them, as this may lead to increased risk of immediate harm.

Firstly, assess the situation, and report to a manager, an SPoC, or HR if you are sure that it is safe to do so. If, for any reason, you are uncomfortable reporting your concerns to this individual, use a whistleblowing procedure.

You do not need to be sure that Modern Slavery is taking place or fully understand the types and definitions to report your concerns.

It is important to take into account the needs and wishes of suspected victims, whilst bearing in mind some barriers that may make it difficult for them to come forward. Never use an accompanying person as an interpreter – the suspected victim should be spoken to alone.

### Calling:

- If there is risk of immediate harm, police should be contacted by calling **999**.
- If there is not an immediate risk of harm, call the police non-emergency line on **101** and request the **Modern Slavery Unit**, or the Regional Coordinator if the local police force do not have one.
- The **Modern Slavery Helpline** on **08000 121 700** has 24/7 support and language capability with an anonymous option.
- Contact **Slave Free Alliance** on **0300 008 0044** (9am – 5.30pm) or email at [info@slavefreealliance.org](mailto:info@slavefreealliance.org)
- Contact **Hope for Justice** on **0300 008 8000** (9am – 5.30pm) or email at [info.uk@hopeforjustice.org](mailto:info.uk@hopeforjustice.org)

### Reporting (for first responders):

- Report the incident to the police on **101**.
- The **Local Authority Adult Social Services** should be informed immediately; all potential victims are able to access support including emergency medical care, and potential victims at risk of destitution are eligible for emergency accommodation<sup>32</sup>.
- The **National Referral Mechanism**<sup>33</sup> (NRM) is a framework for identifying victims of Modern Slavery and ensuring they receive the appropriate support for potential victims who come to the attention of authorised first responder organisations<sup>34</sup>, including local authorities, specified NGOs, police forces, and some government agencies.
- Contact the **Gangmasters and Labour Abuse Authority** to report concerns about the mistreatment of workers on **0800 432 0804**, or by email [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)
- Contact **Crimestoppers**, a completely anonymous independent charity reporting crime, on **0800 555 111**.

32. Home Office and Ministry of Justice, 2016. Support for victims of Modern Slavery. Online: <https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>

33. Home Office and UK Visas and Immigration, 2022. Modern slavery victims: referral. Online: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

34. Home Office, 2016. Victims of Modern Slavery – frontline staff guidance. Online: <https://www.antislaverycommissioner.co.uk/media/1057/victims-of-modern-slavery-frontline-staff-guidance-v3.pdf>





Section 12

# Functions and responsibilities matrix

	Appoint specific individual(s) within the organisation to have ultimate responsibility for business response to Modern Slavery risk	Establish specific senior leader/ Exec sponsorship	Identify Modern Slavery risks across recruitment, operations & procurement processes – internal & supply chain	Set strategy and establish Modern Slavery policy (should include how compliance with policy is managed and monitored)	Communicate Modern Slavery policy with the business and supply chain	Develop a competency and awareness training framework for all employees (relevant to roles, material updated annually)	Conduct Risk Self-Assessment	Implement processes & controls to mitigate, manage and monitor Modern Slavery risk and issues (e.g. Whistleblowing activity controls' effectiveness testing)	Actively engage with all suppliers, market peers and external bodies to support continuous improvement towards combatting Modern Slavery	Annual Modern Slavery Statement (include actions taken to combat Modern Slavery internally and supply chain)
Exec/Senior leadership	●	●		●	●				●	●
Governance & Risk Management function			●	●	●	●	●	●	●	●
Senior Management - Business operations (including supplier management)	●		●		●		●	●	●	●
HR/People			●		●	●	●	●	●	●
Learning and Development					●	●				
Recruitment agencies					●					
Procurement			●		●		●	●	●	●
Recruiting Managers					●		●	●	●	
Payroll								●		
All colleagues						●				

## Section 13

## Practical steps for business: checklist

The UN Guiding Principles (UNGP) on Business and Human Rights provide a clear framework and useful global approach that businesses can use to prevent and address the risk of business-related human rights abuses, including forced labour, trafficking and slavery in their entire supply chain<sup>35</sup>. The UN Human Rights Council unanimously endorsed the UNGP have obtained wide acceptance from the business community, trade unions, civil society and governments around the world.

The UNGP are founded on three pillars:

1. Protect – State duty to protect, promote and support human rights
2. Respect – Corporate responsibility to respect human rights
3. Remedy – Access to remedy for victims of business-related abuses

Phase		Actions
1	Commitment & Strategy	<ul style="list-style-type: none"> <li>• Board to agree commitment and strategy to tackle Modern Slavery throughout organisation and supply chain.</li> <li>• Assign specific Board Director/Senior Exec sponsorship with accountability for implementation of policy and framework.</li> <li>• Communicate your policy to your suppliers and obtain formal acceptance and commitment to the implementation of policy terms, at onboarding stage and at least annually.</li> </ul>
2	Risk Assessment	<ul style="list-style-type: none"> <li>• The ambition should be to map the organisation's end to end supply chain, including any organisations that provide labour into your business and provide resource within your suppliers' supply chain.</li> <li>• The immediate priority should be to identify where the risks in your own organisation as well as the supply chain may lie, based on vulnerabilities, and prioritise these initially<sup>36</sup>.</li> <li>• Conduct a risk assessment<sup>37</sup> to understand where the risks are in your organisation and within the organisation's supply chain. These vulnerabilities should inform the above policy.</li> </ul>
3	Planning & Implementation	<ul style="list-style-type: none"> <li>• Develop a Modern Slavery and labour exploitation policy and framework – which should, as a minimum:               <ul style="list-style-type: none"> <li>• reflect the guidance within British Standard BS25700 Organisational Response to Modern Slavery<sup>38</sup>; and refer to the UK Government Modern Slavery guidance<sup>39</sup>;</li> <li>• outline how compliance with policy is managed and monitored;</li> <li>• be informed by the risk assessment conducted; and,</li> <li>• be subject to review whenever necessary and/or appropriate, at least annually.</li> </ul> </li> <li>• Develop an implementation plan, identifying and allocating responsibilities and resource, to fully implement the policy clarifying tasks and setting clear expectations and timetables.</li> <li>• Consult and engage within your organisation so that appropriate processes and systems can be put into place to mitigate, manage and monitor Modern Slavery risk and issues (particularly in recruitment, procurement and supply chain management).</li> <li>• Appoint specific individual(s) within the organisation who will have ultimate responsibility for business response to Modern Slavery risk, this includes responsibility for:               <ul style="list-style-type: none"> <li>• implementation of the policy and framework;</li> <li>• updating the Board and/or senior leadership team with updates on compliance status and any regulatory changes;</li> <li>• provide suppliers and other stakeholders with detail on changes to compliance requirements; and,</li> <li>• investigating any reported concerns relating to Modern Slavery or exploitation.</li> </ul> </li> <li>• Actively engage with all suppliers to support their management of the risk of Modern Slavery, supporting continuous improvement towards combatting Modern Slavery, in line with British Standard BS25700 and the policy.</li> <li>• Communicate the Modern Slavery and labour exploitation policy to all managers and those with specific sourcing responsibilities.</li> </ul>

35. United Nations, 2011. Guiding principles on business and human rights. Online: [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)

36. Stronger Together, 2019. Prioritisation and Action Planning Tool. Online: <https://www.stronger2gether.org/product/prioritisation-and-action-planning-tool/>

37. Stronger Together, 2019. Risk Assessment Tool. Online: <https://www.stronger2gether.org/product/risk-assessment-tool/>

38. British Standards Institution, 2022. British Standard 25700. Online: <https://www.bsigroup.com/en-GB/standards/bs-25700/>

39. Home Office, 2023. Modern Slavery: statutory guidance for England and Wales and non-statutory guidance for Scotland and Northern Ireland. Online: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

Phase	Actions
<p>3 Planning &amp; Implementation (cont'd)</p>	<ul style="list-style-type: none"> <li>• Provide Modern Slavery training on the organisation's Modern Slavery framework to all employees with specific sourcing responsibilities (e.g. recruiting managers and procurement teams).</li> <li>• Provide Modern Slavery awareness training to all staff<sup>40</sup>. This could include <b>learning pathways</b> developed by the Supply Chain Sustainability School on Modern Slavery, due diligence, and reducing risks on site. Each pathway can be allocated to colleagues, contain multiple resources, and completion entitles the learner to a 'badge'.</li> <li>• Ensure that a whistleblowing policy is in place and that the whistleblowing mechanism is available and communicated to all staff.</li> <li>• Have a clear process in place for escalation internally and with relevant external bodies that will provide help and support for response<sup>41</sup>.</li> </ul>
<p>4 Monitoring &amp; Continual Improvement</p>	<ul style="list-style-type: none"> <li>• Undertake effective measurement, monitoring and remediation of your performance against standards outlined within policy and framework.</li> <li>• Develop a competency and awareness training and monitoring framework (subject to at least annual review) for all employees relevant to roles, including HR/People, recruiting managers, procurement, and those with supply chain management responsibilities, and frontline staff.</li> <li>• Conduct annual self-assessment of Modern Slavery risk.</li> <li>• Benchmark your policy and framework against the industry, to identify improvements or changes to guidance, on an ongoing basis.</li> <li>• Review and update Modern Slavery training materials, highlighting any changes identified from industry guidance, the wider risk landscape, and/or changes to existing process, to ensure all relevant colleagues are appropriately informed on a timely basis.</li> <li>• Actively engage with all suppliers to support their management of the risk of Modern Slavery, supporting continuous improvement towards combatting Modern Slavery, in line with British Standard BS25700 and your organisation's policy.</li> </ul>
<p>5 Reporting</p>	<ul style="list-style-type: none"> <li>• Communicate annually with the Board on progress managing these risks, meanwhile escalating any issues or changes to Modern Slavery risk exposure, immediately. Management can take the form of actively engaging with all suppliers to support continuous improvement towards reducing Modern Slavery risks, for example.</li> <li>• Produce a Modern Slavery Statement (do this as best practice even if you do not meet turnover criteria). The statement should: <ul style="list-style-type: none"> <li>• provide detail of the actions taken to combat Modern Slavery both internally and throughout your supply chain;</li> <li>• be published on an organisation's website with a link in a prominent place on the homepage or a copy provided, on request, within 30 days; and,</li> <li>• be formally reviewed annually.</li> </ul> </li> </ul>

40. Home Office, 2021. Modern slavery training resource page. Online: <https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>

41. Stronger Together, 2019. Corrective Action Plan Template. Online: <https://www.stronger2gether.org/product/corrective-action-plan-template/>

## Section 14

## Labour sourcing good practice

Within the service and infrastructure projects industry, sourcing labour from third parties is commonplace. The nature of this workforce can present risk factors to exploitation and Modern Slavery.

When sourcing labour indirectly, it is important to understand from where, and how, your recruitment agencies and subcontractors source their labour.

Labour providers should be reputable and able to demonstrate best practice and compliance within applicable regulatory frameworks. Below are some useful points to consider when engaging with labour providers:

Points to Consider		
1	Is the agency a member of a professional association, body or compliance scheme (e.g. <b>Association of Labour Providers; Recruitment and Employment Confederation</b> )?	
2	Does the agency hold any additional affiliations (e.g. <b>Investors in People, ISO standards</b> ). This does not guarantee the agency is risk-free, but may indicate professionalism.	
3	Does the agency use middlemen to source staff? How many sub-agents are there? What checks does the agency do to ensure the subagent/s is working legitimately and adhering to standards?	
4	Does the agency have a code of conduct? Does this specify a clear prohibition of the use of forced / trafficked labour? Have you provided the agency with basic compliance principles? A template from Stronger Together can be found <b>here</b> .	
5	What is the nature of the roles being recruited? Are they low paid roles requiring low skill levels?	
6	Is the work seasonal or unsocial in nature (i.e. shift work)?	
7	Are workers directly recruited from overseas?	
8	Do all employees, including temporary workers, have a written contract outlining the terms of their employment or engagement?	
9	Do any of the employees pay direct or indirect fees to obtain work?	
10	Are all employees, including temporary workers, paid at least the legal minimum wage after any deductions except for PAYE, Pensions, cash advance and NIC deductions?	
11	If the agency is offering or charging suspiciously low rates, use indicative pricing statistics to assess quotations and fees. Guidance on minimum rates of pay should be referred to <sup>42</sup> . Have you provided challenge where this has not been met?	
12	Are agency workers entitled to the same treatment for basic employment and working conditions after 12 weeks as guaranteed under the Agency Workers Regulations 2010 <sup>43</sup> ?	
13	Does the agency adhere to the Working Time Regulations 1998 <sup>44</sup> ? Are employees given the opportunity to opt-out of working in excess of 48 hours a week?	
14	Have any fees or deposits been paid by the workers to the agency or any middlemen? What for? How much? Are any of these refundable? Is there written documentation to substantiate this? Template recruitment fees policies from Stronger Together can be found <b>here</b> .	
15	Have any documents been retained (e.g. passport, bank card)? What arrangements are there for returning or allowing staff access to these? Is there written documentation to substantiate this?	
16	Does the agency pay the national minimum wage for any time spent by a worker on an induction which should be classed as working time?	
17	Are all workers informed of their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to? The GLAA provide workers' rights leaflets in 21 languages which can be accessed <b>here</b> . A video for use in inductions for workers in the UK has been developed by Stronger Together and can be accessed <b>here</b> .	
18	Have workers received relevant training and inductions on health and safety? Have they been provided with the appropriate personal protective equipment to undertake their role?	
19	Are workers paid by electronic transfer into their own personal bank account and not into the bank account of a third party? Does the agency rely on cash-in-hand? Can this be avoided if so?	

42. Gangmasters & Labour Abuse Authority, 2023. What should I charge for my workers? Online: <https://www.glaa.gov.uk/i-am-a/i-supply-workers/do-i-need-a-glaa-licence/what-should-i-charge-for-my-workers/>

43. U.K. Parliament, 2010. The Agency Workers Regulations 2010. (93) Online: <https://www.legislation.gov.uk/uksi/2010/93/contents/made>

44. U.K. Parliament, 1998. The Working Time Regulations 1998. (1833). Online: <https://www.legislation.gov.uk/uksi/1998/1833/contents/made>

Points to Consider		
20	Does the agency routinely complete duplicate bank account checks? Does a group of workers have their wages paid into the same bank account? Does the agency check the bank account is under the worker's name?	
21	Are any workers having money deducted from their salary for accommodation, transport, food or supposed debt repayments. If there are, is there written expressed consent from the worker?	
22	Any deductions from salary, other than for pension, tax, national insurance contributions, attachment of earnings orders or deduction from earnings orders must be expressly consented to by the worker. Does the agency adhere to this?	
23	Where workers are paying for transportation to work, the operator of that transportation service must hold an operator's licence. Does the agency adhere to this?	
24	Are regular welfare discussions, including around Modern Slavery, being held with team members?	
25	What checks does the agency perform to establish a worker's identity and eligibility to work? Applicants' right-to-work documentation can be checked by referring to the Home Office <b>guidance</b> and the Supply Chain Sustainability School have developed guidance, too, which can be accessed <b>here</b> .	
26	Are documents provided by the potential employee checked to ensure they are genuine, original and unchanged; and belong to the person who has given them to you. Proof of address can be obtained by requesting utility bills, bank statements, or identification.	
27	Are employees' photos checked to ensure they are the same across all documents and look like the applicant?	
28	Are details such as names and dates of birth checked to match across all documents?	
29	Does the agency/labour provider have a Modern Slavery Policy (and statement if applicable)?	
30	Does the agency/labour provider provide a way for workers to raise concerns about Modern Slavery confidently and confidentially? Stronger Together have developed template questionnaires for workers, which can be accessed <b>here</b> , as well as a template supplier evaluation of grievance mechanisms which can be found <b>here</b> .	
31	Are Modern Slavery multilingual posters where applicable, displayed, and leaflets available to workers? These can include the <b>SOS Hand Signal posters</b> .	

## Auditing

When conducting both announced and unannounced audits, you should ensure that there is an opportunity for you to talk to agency staff directly.

You should consider checking the following:

- Do employees have a written contract? Do they understand and agree to it?
- What is their relationship with the agency like?
- Is there any indication that they are being controlled?
- Are there signs that they are forced to work more hours than they normally would?
- Are there indicators of fees being paid, either for the employment or any other services?

It is important to note some limitations of audits which organisations should be aware of, including:

- audits will not pick up on every issue, especially things which are deliberately hidden;
- audits do not focus on the perspectives of workers themselves, meaning a true picture of conditions may remain hidden;
- the outputs of audits are usually corrective action plans which don't always identify patterns, discrepancies, or recurring themes; and,
- opportunities exist to reward suppliers for good practice and upskill staff which can improve the nature of a supplier relationship, worker satisfaction, and productivity.

A template for conducting supplier visits has been developed by Stronger Together and can be accessed [here](#).

## Section 15

## Procurement



Organisations' supply chains may contain risks of Modern Slavery. This section relates to how organisations supplying services manage their supply chains to minimise this risk.

There are a number of organisations that offer services to support effective management of Modern Slavery risks in the supply chain, and Section 8 of BSI 25/700 addresses procurement specifically<sup>45</sup>.

Guidance for key stages of the procurement life cycle (see Section 9) are included below to help your organisations manage their relationship with supply chains.

### Developing a Sourcing Strategy

Including:

- Defining business needs and develop a specification.
- Conducting market analysis.
- Developing the category strategy.

This is the earliest opportunity to address the risk of Modern Slavery occurring in the supply chain. In-depth market analysis will develop a comprehensive understanding of the sourcing options and the associated risks for Modern Slavery. This includes the provenance/origin of goods or services, the production processes, the types of workers, the key suppliers within the market supply chain and the likelihood or prevalence of less visible sub-contracting.

It is highly recommended that a detailed risk assessment is carried out to enable prioritisation of resources and development of an appropriate action plan. Stronger Together have produced a full **Tackling Modern Slavery through Purchasing Practices Toolkit**, and a **Tackling Modern Slavery in Global Supply Chains Toolkit**, which provide further information, templates and checklists to help you develop your approach. There are also workshops available to support your programme.

45. British Standards Institution, 2022. British Standard 25700. Online: <https://www.bsigroup.com/en-GB/standards/bs-25700/>

## Supplier Selection

Including:

- Tender documentation and a detailed specification.
- Supplier selection to participate in tender.
- Issuing tender documents.
- Tender evaluation & validation.
- Contract award & implementation.

As part of the tender documentation, organisations should clearly state their expectations of suppliers with relevant criteria, and appropriate weighted scoring, at each stage of the tender process including the pre-qualification stage.

At this stage, it is highly recommended that buyers develop/share a supplier code of conduct or policy which outlines your expectations of suppliers in relation to Modern Slavery and human rights.

For instance, your organisation could share the **ETI Base Code** with suppliers and check they are able to comply.

Stronger Together have created a **Procurement Principles Template** which could be used/adapted

Organisations should also assess suppliers' and potential suppliers' capability and maturity in assessing and managing the risks of Modern Slavery. To do so, organisations should check who is responsible for ethical trade and Modern Slavery within the supplier's organisation and confirm their route of escalation if an incident or potential incident is identified. Stronger Together have also produced a **free template of questions** to ask as part of tenders.

## Supplier Management

Guidance:

- Contract performance & improvement.
- Supplier relationship management.

Organisations need constantly to monitor the performance of their suppliers and develop strong relationships to enable transparency when tackling the risk of Modern Slavery. Actions should focus on the highest priority suppliers and undertake detailed supplier assessments to identify what is required to mitigate the risks.

Supplier assessments could include the following:

- supplier questionnaires;
- supplier interviews;
- spot checks;
- management system certification;
- audits; and,
- progress, including what the supplier is doing to manage risks and train staff.

It is also recommended that your supply chain is mapped on a regular basis to identify your highest risk areas. The Sustainable Supply Chain School have a **free module on supply chain mapping** for the built environment which may help to inform your approach. The Home Office have also developed a **practical guide** for organisations to tackle Modern Slavery in their supply chains.

There may be behaviours from organisations at any stage of the supply chain which could indicate or facilitate a higher risk of Modern Slavery occurring. Signs which require further investigation may include:

- Aggressive pricing that does not consider sustainable production costs;
- Short lead times;
- Late high-volume orders;
- Inaccurate forecasting;
- Late or extended payments;
- Withdrawn from contracts last minute;
- Unfair penalties for not meeting orders despite last minute changes; and,
- Inaccurate technical specifications.



## Section 16

# Example modern slavery policy

This is a template to be modified as required and for inclusion within a wider Tackling Modern Slavery in Business and Supply Chains or Business and Human Rights policy. Guiding principles developed by Stronger Together can be accessed [here](#).

### Policy statement

- [Company] commits to developing and adopting a proactive approach to tackling hidden labour exploitation.
- Hidden labour exploitation is exploitation of job applicants and workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators with victims, if they perceive of themselves as such, reluctant to come forward.

### Coverage

- To which site(s) does this policy apply?
- Who has overall responsibility for this policy?
- Who (which jobholders) have specific responsibilities for various aspects of this policy?

### Policy Commitments. [Company] shall:

- Designate appropriate managers (who/job title) to attend Modern Slavery training and to have responsibility for developing and operating company procedures relevant to this issue.
- Accept that job finding fees are a business cost and will not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third party labour exploitation and signs to look for.
- Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
- Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters and Labour Abuse Authority and police.
- Provide information on tackling "Hidden Labour Exploitation" to our workforce through (list formats e.g. in a variety of formats such as workplace posters, worker leaflets, induction, other training).
- Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
- Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities (detail how).
- Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above

## Section 17

## Example minimum standard for labour providers

This is a template to be modified as required for inclusion in engagement with suppliers or labour providers.

This document sets out the minimum standards that we expect any labour provider supplying workers onto our sites to follow.

We are committed to ensuring that all our workers' rights are protected and that they benefit from good labour standards, whether they are employed directly by us or indirectly by a labour provider. We need your support and commitment to help us ensure that labour exploitation, Modern Slavery and human trafficking have no place in our business. As a supplier of labour into our business, we ask that you meet the following requirements, as a minimum, with an expectation to exceed as agreed in line with your customer.

Specifically, the **ETI Base Code** stipulates that:

1. The fundamental rights of workers are protected. Namely,
  - a. Employment is freely chosen
  - b. Freedom of association and the right to collective bargaining are respected
  - c. Working conditions are safe and hygienic
  - d. Child labour shall not be used
  - e. Living wages are paid
  - f. Working hours are not excessive
  - g. No discrimination is practiced
  - h. Regular employment is provided
  - i. No harsh or inhumane treatment is allowed
2. A Modern Slavery and human rights policy will be in place, which will include tackling hidden exploitation.
3. An escalation process must be agreed with customers on how to work together should any breach and/or concern of a breach occur against labour standards.
4. All business shall be conducted ethically, with no bribery, corruption or any type of fraudulent business practice.
5. A sustainable charge for services will be made, which covers legal obligations, specific service costs, general business operating overheads plus a sustainable net margin. Reference **ALP Charge Rate Guidance**.
6. Recruiters, managers and supervisors will be trained, on a regular basis, on how to spot the signs of labour exploitation and human trafficking and how to report it.
7. Processes will be in place to identify potential exploitation and human trafficking. These processes should include, but not be limited to, HR cross checks to identify multiple uses of bank accounts and home addresses.
8. Regular discussions with workers, including welfare checks should be carried out to identify possible exploitation and human trafficking.

- 9. No workers will be required to lodge deposits or their identity papers and will be free to leave their employment after reasonable notice.
- 10. No worker shall pay for a job. Workers will not be charged any fees, or have any deductions taken from wages without express written consent. This includes, but is not limited to, deductions/fees for the following: recruitment fees, training, induction, security checks, workwear, equipment needed to do the job, administration.
- 11. All wages must be paid directly to the individual.
- 12. All workers will receive a contract which sets out wages and working hours, for each specific contract they work on. Key terms and conditions of the job must be available to the worker in a language they can understand.
- 13. A process will be in place to inform all workers of their rights and how to report any concerns. This can include, but should not be limited to, providing workers with a copy of the **GLAA's Workers' Rights leaflet** in a language they understand.
- 14. Standard working hours in a week shall not exceed 48 hours. Overtime including the total working hours in a week shall not exceed 60 hours.
- 15. Records of all working hours will be documented and maintained, reflecting all sites of employment if workers have worked on multiple sites or for multiple clients. These records will be used to evidence that working hours are not excessive and that any overtime worked is voluntary.
- 16. Right to work checks will be carried out for every worker and appropriate records maintained.
- 17. There will be no sub-contracting or use of labour sourcing agents without previous agreement from the client. These minimum standards will also apply to any sub-contractors/intermediaries.
- 18. Modern slavery statement will be published in line with legislation and good practice, if required. Please note that UK law requires all UK businesses with a turnover of £36 million or over to publish a Modern Slavery statement.

Please confirm that you have read and agree to meet these requirements:

Signed by.....

Printed.....

On behalf of (company).....

Date.....

## Section 18

## Closing remarks

As Co-Chairs, Simon and Madeline are so grateful to all contributors to this project, especially the members of the Council and Steering Committee who have deployed their time and resources to create a functional support tool which will hopefully help companies throughout the UK and globally to see and tackle modern slavery in their own organisations and supply chains.

We would also like to thank the anti-slavery organisations we have worked with, and will continue to work with, including the Slave-Free Alliance, Action Sustainability, Bright Future, Hope for Justice, Scotland Against Modern Slavery, and the Supply Chain Sustainability School - as well as our newest members Unseen and Alcumus.



We thank the Cabinet Office and the Home Office for their guidance and commitment to the council and its projects.

Finally, without the support of the BSA, this initiative would not be where it is today and we thank them for their tireless dedication to supporting the Council and Steering Committee.

## Section 19

# Resource library

## Introduction

### British Standards Institution: British Standard 25700

National standards and guidance for organisations on how to manage Modern Slavery risks in their operations, supply chains and wider operating environment

### Cabinet Office: PPN 02/23: Tackling Modern Slavery in Government Supply Chains

Guidance which sets out how UK Government departments must take action to ensure Modern Slavery risks are identified and managed in government supply chains.

### European Parliament and Council of the European Union: Directive (EU) 2022/2464, as regards corporate sustainability reporting.

Directive which entered into force in January 2023 which modernises and strengthens the rules concerning the social and environmental information that companies have to report.

### German Parliament: Act on Corporate Due Diligence Obligations in Supply Chains

Act which entered into force in January 2023 which obliges companies to address human rights-related and environment-related due diligence obligations in their supply chains.

### Home Office: Modern Slavery statutory guidance for England and Wales and non-statutory guidance for Scotland and Northern Ireland

Guidance aimed at competent authority staff in any part of the UK who make decisions on whether individuals are potential victims of Modern Slavery for the purpose of the National Referral Mechanism

### Home Office: Publish an annual Modern Slavery statement

Information to help you identify if your organisation needs to publish a Modern Slavery statement and best practice guidance on producing a statement.

### U.K. Parliament: Modern Slavery Act 2015

Act which requires businesses over a certain size to disclose each year what action they have taken to ensure there is no Modern Slavery in their business or supply chains.

### United Nations: Guiding principles on business and human rights

Guiding principles for businesses to enhance standards and practices and achieve tangible results for affected individuals and communities

### U.S. Congress: Uyghur Forced Labour Prevention Act

Act signed into law in December 2021 prohibiting imports made in Xinjiang by forced labour into the United States.

## What is Modern Slavery?

### Home Office: A typology of Modern Slavery offences in the UK

Research which looks at different types of Modern Slavery in the UK

### Home Office: Modern slavery awareness booklet

Guidance aimed at a broad range of public sector staff who can potentially witness indicators of Modern Slavery.

### Home Office: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022

Official statistics which provide a summary and breakdown of the number of potential victims of Modern Slavery referred into the National Referral Mechanism or via the Duty to Notify process in 2022.

### International Labour Organisation (ILO): 50 million people worldwide in Modern Slavery

The ILO's latest estimates of forced labour in the last five years.

### Stop the Traffik: Why can't victims of trafficking just walk away?

Stop the Traffik's webpage about the reasons victims of trafficking can't or don't escape.

### United Nations Office of Drugs and Crime (UNODC): Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime

The UNODC's Protocol preamble which defines trafficking.

### Unseen: Types of Modern Slavery

Unseen's webpage about the most common forms of slavery.

### Verisk Maplecroft: Risks of Modern Slavery in UK highest in West Midlands, London and Greater Manchester

Research which demonstrates that the risks of Modern Slavery in the UK are highest for people with no qualifications, are foreign-born, and in the regions of West Midlands, Metropolitan London, Bedfordshire, Greater Manchester and West Yorkshire.

### Hope for Justice: Spot the Signs of Modern Slavery

### Hope for Justice: What is Human Trafficking?

## The Service and Infrastructure Projects sector

### Oxford Economics and the Business Services Association: The UK market for business services: The national, regional and constituency picture in 2013

Research commissioned by the BSA which measures the value and cope of service activities in the UK.

### Stronger Together: Tackling Modern Slavery in the Construction Sector Toolkit

A Toolkit for employers and labour providers in the construction sector to inform, equip and resource them to tackle Modern Slavery.

## High Risk Areas within the Sector

### [Gangmasters & Labour Abuse Authority \(GLAA\): Industry Profile – Cleaning](#)

Indicative trends in labour exploitation in the cleaning industry including victim profiles, location, how they are recruited and how to prevent exploitation.

### [GLAA: Industry Profile – Construction Industry](#)

Indicative trends in labour exploitation in the construction industry including victim profiles, location, how they are recruited and transported to the UK.

### [GLAA: Industry Profile – Food Service Industry](#)

Indicative trends in labour exploitation in the food service industry including victim profiles, location, how they are recruited and working conditions.

### [GLAA: Industry Profile – Recycling and Waste Industry](#)

Indicative trends in labour exploitation in the recycling and waste industry including victim profiles, recruitment and accommodation in the UK.

### [Home Office: Modern slavery factsheet – construction industry](#)

Factsheet to support organisations in the construction industry to protect workers and spot the signs of slavery.

### [Home Office: Modern slavery factsheet – food industry](#)

Factsheet to support organisations in the food industry to protect workers and spot the signs of slavery.

### [Home Office: Modern slavery factsheet – hospitality industry](#)

Factsheet to support organisations in the hospitality industry to protect workers and spot the signs of slavery.

### [Independent Anti-Slavery Commissioner: Operation Cardinas and Beyond: Addressing exploitation risk in the construction sector](#)

A report reviewing the factors that lead to exploitative environments in the construction sector and exploring the most effective ways that businesses can safeguard workers

### [IPHR Forum: Modern Slavery Toolkit: Waste & Recycling Sector](#)

A Toolkit aiming to provide businesses a best practice guide on how to address the risks of Modern Slavery within the waste and recycling industry and supply chain.

## Spotting the Signs

### [GLAA: Spot the signs](#)

Webpage detailing the indicators of trafficking and forced labour

### [Stronger Together: Checklist of potential indicators of worker exploitation](#)

A range of monitoring measures and flags that employers and labour providers may use to deter and identify situations of exploitation

### [Stronger Together: Guidance for identifying victims of Modern Slavery](#)

### [Unseen: Spot the signs of Modern Slavery](#)

Webpage detailing the signs of Modern Slavery and exploitation

## What to do if you suspect someone is a victim of Modern Slavery

### [Home Office: Victims of Modern Slavery – frontline staff guidance](#)

Guidance for frontline staff in the Home Office to help them identify potential victims of Modern Slavery

### [Home Office: Report Modern Slavery as a first responder](#)

Guidance for reporting cases of Modern Slavery in the UK as first responders

### [Home Office and Ministry of Justice: Support for victims of Modern Slavery](#)

Leaflets outlining the support available for victims of Modern Slavery in 11 foreign languages

### [Home Office and UK Visas and Immigration: Modern slavery victims referral](#)

Guidance on referring potential victims of Modern Slavery/human trafficking to the national referral mechanism

### [Human Trafficking Foundation: Trafficking Survivor Care Standards](#)

Guiding principles and practical recommendations to support the needs of survivors.

### [Unseen: Supporting survivors](#)

How Unseen provides specialist care for survivors

## Practical steps for business

### [Home Office: Modern Slavery training resource page](#)

Resource containing basic awareness raising materials

### [Stop the Traffik: Toolkit to help SMEs mitigate their risk of exploitation](#)

Free Toolkit for SMEs including a simple risk self-assessment, practical steps to protect employees, and guidance on how to report Modern Slavery concerns

### [Stronger Together: Corrective Action Plan Template](#)

Sample areas of focus for a Corrective Action Plan agreed between suppliers and organisations, which should be developed and amended to reflect the organisation's supply standards.

### [Stronger Together: Prioritisation and Action Planning Tool](#)

Guidance about which suppliers to prioritise and the types of actions to consider

### [Stronger Together: Risk Assessment Tool](#)

A process for businesses to assess their supply chain risk

### [Supply Chain Sustainability School: Modern Slavery learning pathway](#)

Aims to increase learner understanding of Modern Slavery risks within organisations and supply chains.

### [Supply Chain Sustainability School: Site Set-Up](#)

Aims to support the set-up of construction sites to manage Modern Slavery risks.

## Labour sourcing good practice

### Association of Labour Providers (ALP): Support Services

Support for members of the ALP.

### GLAA: What should I charge for my workers?

Guidance on the indicative minimum charge rates showing the basic rate a labour provider is likely to charge.

### GLAA: Workers' checklist poster

Multi-language posters outlining workers' rights in the UK

### Home Office: Checking a job applicant's right to work

Guidance for organisations to check that a job applicant is allowed to work for you in the UK.

### Stronger Together: Concrete Video

A video to raise awareness of forced labour for induction and worker training programmes in the construction sector.

### Stronger Together: Effective Communication Toolkit for Multi-Language Workforces

Stronger Together: Employer Good Practice Implementation Checklist – Construction

### Stronger Together: Labour Supply Chain Due Diligence Checklist

### Stronger Together: Sample Worker Interview Questions

Sample questions for use by the investigating manager in face-to-face interviews with workers.

### Stronger Together: SOS Hand Signal

Poster which can be displayed around the workplace (e.g. behind toilet cubicle doors, in staff rooms, around offices, in training material, or emailed internally) for victims of Modern Slavery and labour abuse to use to seek help.

Short film to raise awareness.

### Stronger Together: Template for Conducting Supplier Visits

A template suggested for use by employees when visiting direct and indirect suppliers and viewing production sites

### Stronger Together: Template Recruiter Compliance Principles

A template for use by labour providers and employers for each recruiting individual to sign before interviewing any applicants.

### Stronger Together: Template Recruitment Fees Policy

### Stronger Together: Template Worker Questionnaire

Stronger Together: What do I need to do? Employer and Labour Provider Checklist

### Stronger Together: Working in the UK – Your Rights (multilingual)

A video for use by labour providers and employers to use in inductions for workers in the UK explaining their rights at work and where to report issues.

### Supply Chain Sustainability School: Getting to grips with Right to Work

### U.K. Parliament: The Agency Workers Regulations 2010

Regulations giving agency workers the entitlement to the same or no less favourable treatment for basic employment and working conditions if they complete a qualifying period of 12 weeks in a particular job.

### U.K. The Working Time Regulations 1998

Sets rules for the maximum weekly working hours.

## Procurement

### Chartered Institute of Building: Building a Fairer System: Tackling Modern Slavery in Construction Supply Chains

Document exploring how industry and governments can collaborate to create more ethical and sustainable supply chains for labour and materials around the world

### Ethical Trading Initiative (ETI): Base Code

Internationally recognised code of labour practice.

### Home Office: Slavery and human trafficking in supply chains – guidance for businesses

Government guidance for organisations on how to ensure that slavery and human trafficking is not taking place in their business or supply chains

### Stronger Together: Procurement Principles Relating to Modern Slavery

### Stronger Together: Self-Assessment Questionnaire for Suppliers

Template for businesses to assess now and existing suppliers' policies and practices on forced labour and slavery

### Stronger Together: Tackling Modern Slavery through Purchasing Practices Toolkit

### Stronger Together: Tackling Modern Slavery in Global Supply Chains Toolkit

Toolkit to inform, equip and resource businesses to tackle Modern Slavery in global supply chains.

### Supply Chain Sustainability School: Supply chain mapping resources

Examples of supply chain maps, protocols, and webinars for the built environment.

### Supply Chain Sustainability School: Guidance for procurers

Includes example PQQ questions and KPIs

## Example Modern Slavery Policy

### Modern Slavery Statements Common Principles

Images courtesy of **Hope for Justice** and the **Slave Free Alliance**



**HOPE FOR JUSTICE**



**SLAVE-FREE ALLIANCE**  
Working Towards a Slave-free Supply Chain

You can also report any concerns about any victim to either organisation:

**[hopeforjustice.org](http://hopeforjustice.org)**

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



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