

**includedEd Learning**

**Independent Specialist Education Provider**



# MODERN SLAVERY ACT POLICY

## Contents

1. INTRODUCTION and STATEMENT	p.3
2. RESPONSIBILITY FOR THE POLICY	p.4
3. COMPLIANCE WITH THE POLICY	p.5
4. COMMUNICATION AND AWARENESS OF THIS POLICY	p.6
5. BREACH OF THIS POLICY	p.7
APPENDIX 1 - PRE CONTRACT QUESTIONS	p.8
APPENDIX 2 - PRACTICAL STEPS TO TACKLE MODERN SLAVERY	p.9
APPENDIX 3 - CHECKLIST TO TACKLE MODERN SLAVERY	p.11

## → 1. Introduction and Statement

### **Modern Slavery Act Statement (Year ending August 2021)**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. IncludEd Learning has a zero-tolerance to modern slavery. We are committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in IncludEd Learning's own business or in any of IncludEd Learning's supply chains.

IncludEd Learning is also committed to ensuring transparency in business and in approach to tackling modern slavery throughout IncludEd Learning's supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. IncludEd Learning expects the same high standards from all contractors, suppliers and other business partners.

This policy is being implemented to ensure that we comply with our obligations under the Modern Slavery Act 2015. It documents our commitment to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

In the case of employees, this policy applies to all persons working for IncludEd Learning or on IncludEd Learning's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. In the case of employees, this policy does not form part of any employee's contract of employment and we may amend it at any time.

## → 2. Responsibility for the Policy

The Advisory Panel has overall responsibility for ensuring this policy complies with IncludEd Learning's statutory obligations, and that all staff are required to comply with it.

IncludEd Learning has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains and partners.

IncludEd Learning employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Centre.

## → 3. Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of IncludEd Learning business or supply chains is the responsibility of all. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Head of Centre as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of IncludEd Learning business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Head of Centre or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within IncludEd Learning or any tier of IncludEd Learning's supply chains constitutes any of the various forms of modern slavery, raise it with the Head of Centre or with a member of the Advisory Panel.

IncludEd Learning aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. IncludEd Learning is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of IncludEd Learning's business or in any of IncludEd Learning's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using IncludEd Learning's Compliments and Complaints Policy. Policy.

## → 4. Communication and Awareness of this Policy

Information on this policy, and on the risk IncludEd Learning faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work at IncludEd Learning, and regular information will be provided as necessary.

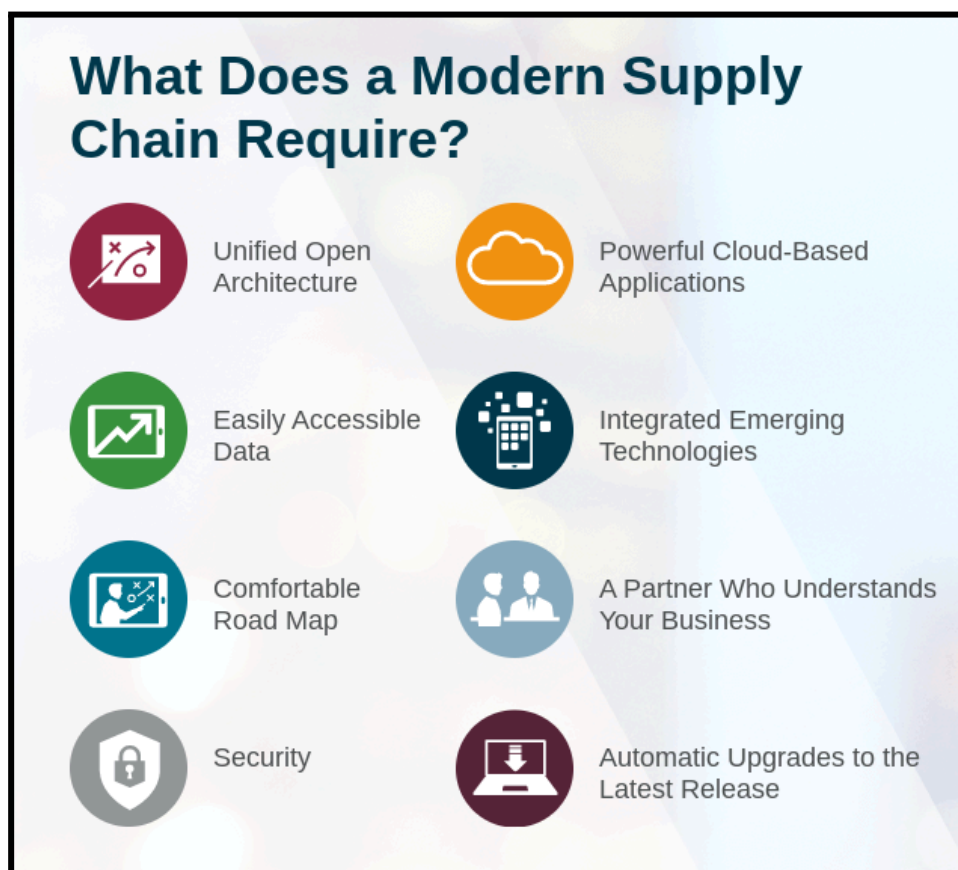
IncludEd Learning's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

## → 5. Breach of this Policy

Any employee who breaches this policy will face disciplinary action, up to and including dismissal.

IncludEd Learning may terminate business relationships with other individuals and organisations working on IncludEd Learning's behalf if they breach this policy.

Date: February 2022



## → Appendix 1

### PRE-CONTRACT QUESTIONS

Before using a Company/Organisation we will make the following checks by researching them using the following proforma:

Name of Organisation	Yes	No
<p>Has the organisation been convicted or been in breach of the Modern Slavery Act 2015, or had any notice served upon it, by any regulator or authority (including local authority)?</p> <p>If IncludEd Learning becomes aware that the organisation has been convicted or served notice the following steps will be taken:</p> <ul style="list-style-type: none"> <li>we will cease to use them as part of our supply chain unless we are satisfied that remedial action has been taken to prevent future occurrences/breaches.</li> </ul>		
<p>Does the organisation have an Anti-Trafficking/Modern Slavery Policy (or incorporated as part of another policy) which details the organisations and supply chains obligations in regards of The Modern Slavery Act 2015 which is actively promoted and adhered to.</p> <ul style="list-style-type: none"> <li>If the answer is no then we will not use the company.</li> </ul>		
<p>Does the company/organisation operate a whistleblowing process which is actively promoted within the organisation and suppliers (where applicable) to report any incident of breaches or suspected breaches of the Modern Slavery Act 2015.</p> <ul style="list-style-type: none"> <li>If the answer is no then we will not use the company.</li> </ul>		

#### Capability Assessment through Pre-qualification

These questions should contribute to a scorecard approach. Insert your own definitions and scores as per your own pre-qualification process.

Question	Poor Response	Good Response	Best Practice
Please provide details of the approach your organisation has taken to addressing or exceeding the requirements of the Modern Slavery Act 2015	No demonstrable understanding of the Modern Slavery Act No supporting policies or commitments relating to addressing modern slavery No mention of how the organisation will work with contractors to manage the risk	Generic policy mentioning Modern Slavery and commitment to addressing the issue Have an Action plan on how to address the supply chain and some commitment to producing a risk assessment to identify areas of high risk Action plan will include, training, supply chain engagement, measurement and continuous improvement plans Tool box talks	Policy created detailing commitment to addressing modern slavery both within the organisation internally as well as the supply chain Policy references whistle blowing facilities and addresses how victims can and will be supported should they be identified. Evidence of supply chain collaboration and procurement activity undertaken to address identified labour exploitation and modern slavery risks Evidence of measurement and engagement



## → Appendix 1

### ETHICAL HIRING AND RECRUITMENT

Experience shows that the recruitment stage is often where workers are most at risk from modern slavery exploitation, especially where third party labour recruiters are involved, and especially where the workers are migrant. It is therefore essential that you pay particular attention to this element of your management systems.

#### GOOD PRACTICE INCLUDES:

- Only working with formal labour providers who are legitimate, registered business entities
- Having clear Service Level Agreements in place with your labour provider
- Conducting checks on the labour providers' management systems, including agency worker documents (eg right to work documents, payslips, contracts)
- Having regular conversations with agency workers to understand if they have been treated correctly

**FIND OUT MORE:** PLEASE READ THE FULL CHECKLISTS IN APPENDIX 2 AND 3 TO UNDERSTAND ALL STEPS YOU SHOULD TAKE WITH YOUR LABOUR PROVIDER.

## PRACTICAL STEPS TO TACKLE MODERN SLAVERY IN YOUR ORGANISATION

BUSINESSES WHO WANT TO PUT IN PLACE GOOD PRACTICE OPERATIONAL AND MANAGEMENT PROCESSES TO DETER HIDDEN LABOUR EXPLOITATION AND/OR TO IDENTIFY ISSUES IN THEIR OWN ORGANISATION SHOULD UNDERTAKE THE STEPS OUTLINED IN THE TABLE BELOW.

THE APPENDIX CONTAINS A FULL CHECKLIST OF ACTIONS TO TAKE AT EACH STEP.

TAKE STEPS	TAKE ACTION
MAKE A COMMITMENT ON MODERN SLAVERY	Assign board level responsibility Discuss what the company wants to achieve in preventing modern slavery
ESTABLISH GOOD MANAGEMENT SYSTEMS	Establish due diligence checks in the appointment of labour providers Only contract formal labour providers with an identifiable legitimate business entity
TRAIN STAFF AND SUPPLIERS	Train relevant staff in how to implement your policies and identify forced labour Train staff visiting suppliers to spot the signs that may indicate worker exploitation
ESTABLISH GOOD LABOUR SOURCING PRACTICES IN YOUR COMPANY AND SUPPLY CHAINS	Develop a written policy that states the cost of recruitment is a business cost and that no cost of recruitment will be charged for workers
ESTABLISH GOOD RECRUITMENT PRACTICES	Train recruiters in the organisation's processes to recognise, prevent and report forced labour, labour trafficking and other hidden third party labour exploitation
PUT IN PLACE GOOD RECORDS AND CHECKS FOR WORKERS	Establish checks of workers' addresses for high occupancy of particular houses Check bank accounts to identify unrelated workers paid into one account
DEVELOP GOOD WORKPLACE MONITORING PRACTICES	Supervisors are trained to monitor, record and report where workers' appearance may show signs of injury or malnourishment
CREATE GOOD WORKPLACE ENGAGEMENT GOOD PRACTICE	Encourage supervisors and managers to talk informally to workers to understand whether any are experiencing issues

# PRACTICAL STEPS TO TAKE TO TACKLE MODERN SLAVERY IN YOUR SUPPLY CHAIN

BUSINESSES WHO WANT TO MANAGE THE RISK OF MODERN SLAVERY ALONG THEIR SUPPLY CHAINS SHOULD CONSIDER THE FOLLOWING STEPS. FOR A FULL SET OF ACTIONS TO TAKE AT EACH STEP, PLEASE SEE THE CHECKLIST IN THE APPENDIX.

THE APPENDIX CONTAINS A FULL CHECKLIST OF ACTIONS TO TAKE AT EACH STEP.

TAKE STEPS	TAKE ACTION
MAKE A COMMITMENT ON MODERN SLAVERY	<ul style="list-style-type: none"> <li>Assign board level responsibility</li> <li>Discuss what the company wants to achieve in preventing modern slavery</li> </ul>
ESTABLISH POLICIES & PROCESSES FOR SUPPLIERS TO REDUCE THE RISK OF MODERN SLAVERY	<ul style="list-style-type: none"> <li>Develop a written policy that states the cost of recruitment is a business cost and that no cost of recruitment will be charged for workers</li> </ul>
ESTABLISH GOOD MANAGEMENT SYSTEMS FOR YOUR SUPPLY CHAIN	<ul style="list-style-type: none"> <li>Establish due diligence checks in the appointment of suppliers to establish their credibility, legitimacy and ability to manage labour rights</li> </ul>
ASSESS WHERE YOUR COMPANY'S GREATEST RISKS OF SLAVERY OCCUR	<ul style="list-style-type: none"> <li>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</li> </ul>
ACT - TACKLE THE RISKS THAT YOU HAVE IDENTIFIED	<ul style="list-style-type: none"> <li>Based on your available resources, take immediate steps to reduce the risk of high risk suppliers</li> <li>Develop channels for gathering and managing future risk information</li> </ul>
PROVIDE ACCESS TO REMEDY	<ul style="list-style-type: none"> <li>Require suppliers to establish grievance procedures</li> <li>Require suppliers to establish a whistleblowing procedure</li> </ul>

## CHECKLIST OF PRACTICAL STEPS TO TAKE, TO TACKLE MODERN SLAVERY IN YOUR BUSINESS

STEP 1: MAKE A COMMITMENT TO MODERN SLAVERY	TICK IF DONE
1. Assign responsibility for addressing modern slavery and human trafficking to a Board level or equivalent director and senior managers.	
2. Form a working group to tackle modern slavery which includes staff from different functions. If a working group is not possible, assign operational responsibility for modern slavery to an individual with the right skills, interests and influence.	
3. Develop a map of the company's key internal and external stakeholders to understand who the company impacts through its operations and supply chain and who can support it in its modern slavery goals.	
4. Discuss what the company wants to achieve in preventing modern slavery e.g. do you want to be a leader in your industry or meet basic legal and industry standards?	
5. Develop an initial implementation plan for how to achieve the company's goals, allocating roles, responsibilities and resources, clarifying tasks and setting clear objectives.	
6. Engage internally, communicating the company's goals for tackling modern slavery.	
7. Review existing company policies to ensure that modern slavery is referenced and that staff and suppliers and partners are clear that the exploitation of workers is not tolerated. This should include an Ethical Trading Policy or Code of Conduct, Procurement policies, supplier contracts and service level agreements, anti-bribery and corruption policies, labour provider contracts and service level agreements.	
8. Review existing company procedures to ensure that modern slavery is referenced and staff and suppliers and partners understand what steps they are responsible for. This should include: staff handbooks, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements.	
9. Communicate changes in policies and procedures to staff and suppliers and partners, translating them into necessary languages as required.	
10. Train human resources, compliance officers, auditors and other relevant staff in how to implement your policies and identify forced labour in practice (See Appendix 1 for guidance on identifying forced labour - SEDEX Guidance on Operational Practice and Indicators of Forced Labour).	
11. Train suppliers and partners and labour providers on how to implement the company's policies.	
12. Where the employer has formal workforce representation arrangements, consult with and work collaboratively with trade unions and/or employee representatives.	
STEP 2: ESTABLISH GOOD MANAGEMENT SYSTEMS FOR YOUR COMPANY'S OPERATIONS	TICK IF DONE
13. Establish due diligence checks in the appointment of labour providers to establish their credibility and legitimacy. Only contract with formal labour providers with an identifiable and distinct legitimate business entity. Ensure labour providers meet legal requirements for the country in which they are operating.	

TICK IF  
DONE

14. Create formal written processes for supervisors and workers to report and record suspected cases of labour trafficking, forced labour and hidden labour exploitation.
15. Generate a system for highlighting issues relating to modern slavery in third party ethical audits in the company's operations and ensuring they are formally investigated and resolved.
16. Demonstrate that regular audits are conducted to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout the business.

### STEP 3: TRAIN STAFF AND SUPPLIERS AND PARTNERS

TICK IF  
DONE

17. Train senior management, human resources, compliance officers, supervisors, auditors and other relevant staff in how to implement your policies and identify forced labour in practice (See Appendix 1 for guidance on identifying forced labour - SEDEX Guidance on Operational Practice and Indicators of Forced Labour).
18. Train security staff to spot the signs that may indicate worker exploitation and to report concerns to appropriate managers.
19. Train all staff visiting suppliers, partners and service providers to spot the signs that may indicate worker exploitation and to report concerns to appropriate managers.
20. Train suppliers, partners and labour providers on how to implement the company's policies.

### STEP 4: ESTABLISH GOOD LABOUR SOURCING PRACTICES IN THE COMPANY'S OPERATIONS AND SUPPLY CHAINS

TICK IF  
DONE

21. Develop a written policy that states the cost of recruitment is a business cost and that no fee or cost of recruitment will be charged for workers, directly or indirectly in whole or in part.
22. Establish systems for monitoring labour providers and labour sourcing agents to ensure no fees are charged to workers, directly or indirectly through the required purchase of goods or services.
23. Create processes to prevent individuals introducing significant numbers of workers for work.
24. Discuss and agree the recruitment selection criteria and a fair and non-discriminatory process used by labour providers.

### STEP 5: ESTABLISH GOOD RECRUITMENT PRACTICES

TICK IF  
DONE

25. Establish processes for recruiting staff which include recording: how the worker found out about the work, whether the worker has paid anyone or will have to pay anyone to obtain the work, whether the worker has paid anyone to get into the country, the worker's landlord's name and the worker's address.
26. Train recruiters in the organisation's processes to recognise, prevent and report forced labour, labour trafficking and other hidden third party labour exploitation.
27. Ensure staff responsible for recruiting staff for the company's own operations and labour providers staff are trained and instructed to report and record where workseekers are introduced by an individual who may claim to be a relative or friend but exerts control over the workers e.g. speaking for them and waiting while they are interviewed.



**STEP 6: PUT IN PLACE GOOD RECORDS AND CHECKS OF WORKERS****TICK IF  
DONE**

28. Establish regular checks of workers' and workseekers' addresses for high occupancy of particular houses and act accordingly on the information.
29. Systematically check bank accounts to identify unrelated workers paid into one account; mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers; documents for the same next of kin and/or same place of origin/location in home country; emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number. Act accordingly on the information for all these checks.

**STEP 7: DEVELOP GOOD WORKPLACE MONITORING PRACTICES****TICK IF  
DONE**

30. Employer directs CCTV cameras and Security Officers to areas where workers disembark from transport to work to monitor any potential suspicious activity.
31. The employer's supervisors and/or security officers 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 demeanor of the drivers and passengers.
32. The employer's supervisors are trained and instructed to monitor, record and report where agency and direct workers 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.
33. The employer's supervisors are trained and instructed to monitor, record and report where agency and direct workers' physical appearance may show signs of injury and malnourishment; their general appearance may be unkempt with inappropriate clothing; they may have few or no personal effects; little or no money for food.
34. The labour provider can demonstrate that its 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.
35. 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.

**STEP 8: CREATE GOOD WORKPLACE ENGAGEMENT****TICK IF  
DONE**

36. Issues workers with materials on how to recognise and report hidden exploitation in relevant languages.
37. Encourage supervisors and managers to regularly talk informally to workers to understand whether any are experiencing issues such as harassment, coercion, bullying, control or exploitation.
38. Issue occasional confidential questionnaires to a sample of workers through a variety of means (email/ post/ group-completion) to understand if any workers are experiencing issues such as harassment, coercion, bullying, control or exploitation.
39. Use independent NGOs, migrant workers support groups or other worker welfare organisations to speak to workers in native language and understand any issues.
40. Support formal worker representatives to engage with workers or where they do not exist speak to groups of workers to determine if there are 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.

41. 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 tackling this issue.

TICK IF DONE

**STEP 9: PROVIDE ACCESS TO REMEDY**

TICK IF DONE

42. Demonstrate that complaints/ grievance procedures are in place, issued to all workers and operated fairly and independently.
43. Verify that labour providers have a complaints/ grievance procedure, issued to all workers and operated fairly and independently.
44. Put in place 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 who is separate to the direct supervision of the worker.
45. Demonstrate that a whistleblowing procedure is in place whereby supervisors and managers can confidentially raise issues of concern to a member of the senior team without fear of retribution.

## CHECKLIST OF PRACTICAL STEPS TO TAKE TO TACKLE MODERN SLAVERY IN YOUR SUPPLY CHAIN

**STEP 1: MAKE A COMMITMENT TO MODERN SLAVERY**

TICK IF DONE

See steps detailed previously in Section 6.

**STEP 2: ESTABLISH POLICIES AND PROCESSES FOR SUPPLIERS AND PARTNERS IN YOUR SUPPLY CHAIN TO REDUCE THE RISK OF MODERN SLAVERY**

TICK IF DONE

46. Develop a written policy for suppliers and partners that states the cost of recruitment is a business cost and that no fee or cost of recruitment must be charged for workers by your suppliers and partners and their suppliers and partners, directly or indirectly in whole or in part.
47. Establish systems for monitoring suppliers and partners to ensure no fees are charged to workers, directly or indirectly during recruitment of employment.
48. Develop a written policy for suppliers and partners which outlines the need for regular checks of documentation to identify: workers' and workseekers' addresses for high occupancy of particular houses; bank accounts which identify unrelated workers being paid into one account; mobile phone numbers linking seemingly unrelated workers; same next of kin and/or same place of origin/location in home country and; same emergency contact numbers.
49. Include in the policy a requirement for suppliers and partners to establish processes for monitoring workers transport to identify any potential suspicious activity, including the training of supervisors to monitor, record and report any issues.

50. Include in the policy the training of supervisors at suppliers and partners' sites in monitoring, recording and reporting cases of workers appearing frightened, agitated or secretive; acting as if they are instructed by another and/or looking to another to speak on their behalf; rejecting help and support when offered, showing signs of injury or neglect, having inappropriate clothing, few or no personal effects and little or no money for food.	<b>TICK IF DONE</b>
51. Include in the policy a requirement for suppliers and partners to act upon the information they have identified through the above checks and to communicate where incidences of modern slavery are found.	
52. Require suppliers and partners to provide information for workers on how to recognise and report hidden exploitation in relevant languages and for supervisors and managers to talk informally to workers on a regular basis to understand whether any are experiencing issues such as harassment, coercion, bullying, control or exploitation.	
53. Require suppliers and partners to support formal worker representatives, if they are in place, to engage with workers and determine if there are any issues with harassment, coercion, bullying, control or exploitation.	
54. Require suppliers and partners to establish confidential means of understanding if workers are experiencing issues such as harassment, coercion, bullying, control or exploitation including questionnaires or links to independent NCOs, migrant worker support groups or other welfare organisations.	
<b>STEP 3: ESTABLISH GOOD MANAGEMENT SYSTEMS FOR YOUR SUPPLY CHAIN</b>	<b>TICK IF DONE</b>
55. Establish due diligence checks in the appointment of suppliers and partners to establish their credibility, legitimacy and ability to manage labour rights in their own operations and their supply chain. Ensure suppliers and partners meet legal requirements for the recruitment and employment of workers in the country in which they are operating.	
56. Create formal written processes for staff visiting suppliers and partners to report and record suspected cases of labour trafficking, forced labour and hidden labour exploitation.	
57. Generate a system for highlighting issues relating to modern slavery for high risk suppliers and partners through third party ethical audits, ensuring that all issues identified are formally investigated and resolved.	
<b>STEP 3: TRAIN STAFF AND SUPPLIERS AND PARTNERS</b>	<b>TICK IF DONE</b>
58. Train all staff visiting suppliers and partners and service providers to spot the signs that may indicate worker exploitation and to report concerns to appropriate managers.	
59. Train suppliers and partners and labour providers on how to implement the company's policies.	
<b>STEP 4: ASSESS WHERE YOUR COMPANY'S GREATEST RISKS OF SLAVERY OCCUR</b>	<b>TICK IF DONE</b>
60. Draw up an initial high level assessment of your supply chain including direct and indirect suppliers and partners, labour providers and contractors to identify low, medium and high risk suppliers and partners.	
61. Identify which suppliers and partners you spend the most with in your supply chain.	

	TICK IF DONE
62. Identify suppliers and partners located in high risk countries where labour rights are not protected.	
63. Identify known high risk industries that have previously been affected by undeclared labour, illegal labour and a high incidence of trafficked persons.	
64. Identify where in your supply chain there are migrant workers who do not work under collective agreements.	
65. Identify where in your supply chain there is unskilled, temporary and/or seasonal labour.	
66. 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.	
67. Identify where in your supply chain there are subcontractors (possibly with several links in the supply chain), temporary staffing agencies and short-term seasonal contracts.	
68. 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.	
69. 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 and partners. Lack of information about your supply chain should be highlighted as high risk.	
70. Refine your risk assessment through external engagement with stakeholders including customers, trade unions and NGOs.	
71. Gather additional information about high and medium risk suppliers and partners using tools including ethical audits and spot check visits.	

STEP 5: ACT – TO TACKLE THE RISKS THAT YOU HAVE IDENTIFIED	TICK IF DONE
72. Assess your available skills and resources in order to determine your ability to tackle high risk suppliers and partners. Consider the staff and finances you have available, your engagement with suppliers and partners, your engagement with government and civil society and your leverage over high risk suppliers and partners.	
73. Based on your available resources, take immediate steps to reduce the risk of high risk suppliers and partners. Steps taken may include: <ul style="list-style-type: none"> <li>a. Additional, in-depth investigations of high risk suppliers and partners to gain further information about the risks of modern slavery</li> <li>b. Engagement of suppliers and partners where the risks identified relate to their suppliers and partners or to labour agencies</li> <li>c. Engagement of stakeholders including government, NGOs, industry bodies and civil society to understand further the risks of slavery</li> <li>d. Cessation of supplier relationships where no other option is available</li> </ul>	
74. Manage longer-term risks and prevent future risks occurring through: <ul style="list-style-type: none"> <li>e. Investigations – undertaking regular ethical audits or other investigations at site level into working practices and working with suppliers and partners to resolve issues identified</li> <li>f. Building supplier and site capability – developing suppliers' and partners' ethical trade expertise through support and training and building sites' human resources capability</li> <li>g. Accreditation – gaining third-party accreditation or certification at site or farm-level</li> </ul>	



TICK IF  
DONE

74. **Contd**

- h. Government – influencing government to introduce legislation or infrastructure that tackles human rights risks
- i. Industrial relations – developing relationships with national trade unions and strengthening on site trade union capacity
- j. Collaborations – join existing industry collaborations or develop collaborations with customers, competitors, suppliers and partners, business associations, civil society, 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.

75. Review and amend your business practices to ensure they do not exacerbate the risk of slavery, for example developing transparent and open relationships with suppliers and partners and customers, establishing clear, timely communication with suppliers and partners, paying a sustainable price, setting clear lead-times and payment terms and giving preference to suppliers and partners who respect human rights.

76. Develop channels for gathering and managing future risk information including building relationships with industry bodies, retailers/customers, NCOs, trade unions, on-site open door and human resource policies, whistle-blower and supplier hotlines, community-facing grievance mechanisms, audit processes and stakeholder engagement. Establish a process for responding to complaints or reported violations.

**STEP 5: PROVIDE ACCESS TO REMEDY**

TICK IF  
DONE

77. Require suppliers and partners to establish complaints/grievance procedures, issued to all workers and operating fairly and independently.

78. Verify that suppliers' and partners' labour providers have a complaints/grievance procedure, issued to all workers and operated fairly and independently.

79. Require suppliers and partners to establish a whistleblowing procedure for workers, supervisors and managers to confidentially raise issues of concern to a member of the senior team without fear of retribution.

80. Ensure that all potential cases of exploitation are thoroughly investigated. Seek support from relevant authorities where necessary and protect and support at risk individuals throughout any investigation.

81. Understand the root causes of exploitation and build learnings into future strategy.