

ESG MARK® QUICK GUIDE MODERN SLAVERY POLICY AND STATEMENT



Introduction

This guide is intended to provide advice on how your business can work to combat modern slavery within your organisation and supply chains by implementing a Modern Slavery Policy and Modern Slavery Declaration. It will firstly explain the difference between the two documents, then provide a framework for what you need to consider when writing a policy or declaration relating to modern slavery.

Specifically, this guide will look at:

1. What is modern slavery?
2. What is a Modern Slavery Policy and Statement?
3. Does my business need to publish a Modern Slavery Policy and Statement?
4. What should a Modern Slavery Policy include?
5. What should a Modern Slavery Statement include?

If you have any questions, suggestions, or feedback, we would love to hear from you. Please get in touch by visiting our website at www.esgmark.co.uk or emailing us at info@esgmark.co.uk.

Additionally, if you feel your suppliers and business contacts would also benefit from being ESGmark® certified, please [click here](#) to send them some introductory information.



What is

Modern slavery is an umbrella term to describe various forms of exploitative labour practices including forced labour, human trafficking, bondage, child labour and forced marriage.

The United Nations defines slavery as referring to *any exploitation that amounts to*

slavery?

Those living in poverty, are at greatest threat.

The International Labor Organization (ILO) estimates that fifty million people are in slavery, twenty-eight million are trapped in forced labour, which is found in almost every country in the world, with more evidence of forced labour evident in

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What is a Modern Slavery Policy?

A Modern Slavery Policy or Modern Slavery Statement are documents used by or for an organisation to address and tackle modern slavery.

Modern Slavery Policy

A Modern Slavery Statement Declaration - is a public declaration that communicates an organisation's commitment to eliminate modern slavery from its operational chains.

It is primarily intended for external stakeholders such as investors, as well as the public, and often refers to an organisation's Modern Slavery Policy. It is a public declaration that outlines how an organisation will tackle modern slavery and is typically updated annually so as to report on progress.

Modern Slavery Policy

A Modern Slavery Policy is a document which outlines an organisation's approach to identifying, detecting, and addressing modern slavery in its operations and supply chains.

It is primarily intended for internal stakeholders, such as management, as well as for implementing and enforcing the policy.

What is a Modern Slavery Statement?

A Modern Slavery Statement outlines the measures and procedures that an organisation has in place to combat modern slavery, as well as the responsibilities of all stakeholders in ensuring compliance.

Modern Slavery Statement

A Modern Slavery Policy is operational, as it details necessary measures for the organisation to align its internal operations with its modern slavery policy. It is typically updated annually so as to report on progress.

A Modern Slavery Statement, on the other hand, is public-facing and operational, as it outlines the organisation's commitment to combat modern slavery and progress, with public transparency being its primary focus.

Does my organisation need to publish a Modern Slavery Policy?

Tackling modern slavery is essential to achieving the [Sustainable Development Goals](#), as outlined in the [Work and Economic Prosperity Strategy](#). Modern slavery cannot be eradicated by government action alone.

The Director-General of the International Labor Organization (ILO) has called for an [“all-hands approach”](#) – business action in ending modern slavery begins with reviewing internal practices and policies.

It is a legal obligation for organisations operating within the UK to publish an annual Modern Slavery Statement set out under Section 54 of the [Modern Slavery Act 2015](#). This applies to UK businesses with a turnover of over £36m to produce goods and services, or to supply goods and Human Trafficking services.

This statement shows how your organisation is doing to prevent modern slavery and human trafficking in its operations and in its supply chain. The statement should be published on the organisation's website.

What do I need to do to publish a Modern Slavery Statement?

1. Register your organisation with the [government modern slavery register](#).

2. Review your organisation's current policies and legal requirements to ensure compliance with the Modern Slavery Act 2015.

3. Your Modern Slavery Statement must be published on the organisation's UK website. It must be visible in a prominent place on the homepage. It must demonstrate your public commitment to ending modern slavery from your supply chain. If the organisation has no website, it must publish the statement to a public website. It must also make a written request to the register in 30 days of the request.

4. Your Modern Slavery Statement must be approved by the board of directors (or the management body) and signed by a director (or equivalent). It must ensure that senior level management are proactively involved in the process to address modern slavery.

For businesses who fail to meet the turnover threshold, the lack of commitment and approach to tackling modern slavery is a good practice. A Modern Slavery Statement with reference to a Slavery Policy can give stakeholders that they are going towards unethical

Similarly, while there is an imperative for organisations to implement a Modern

Slavery Policy, the [recent cases](#) of forced labour in the private sector, is an ensuring your business is not linked with modern slavery. It is a good practice for organisations to ensure business conduct.

Organisations are required to monitor their operations for human rights. Failure to do so can face higher reputational damage and a loss of brand equity.



What's Slavery?

The specific content of your Slavery Policy will depend on the nature, and complexity, of your organisation.

Some key elements of a modern slavery policy are:

Purpose & commitment

Statement of commitment from the organisation to eradicate slavery from its operations & supply chain

Scope

Does the policy apply to your organisation, its subsidiaries, contractors, subcontractors, and suppliers?

Responsibilities

Identify key roles involved in implementing the policy (and who takes ownership of compliance for each)

Risk assessment

How does your organisation assess risks of modern slavery in your operations? (This will depend on your business/sector)

Modern Slavery?

At the highest levels of your organisation are outlined by the ILO (including domestic work, mining, construction, and fishing). However, modern slavery is seen in almost all sectors, and is needed regardless of the industry you operate within.

Identify high-risk areas and take the steps the organisation can take to prevent and remediate risks (such as developing action plans with suppliers to improve compliance).

ESG & Labour Abuse guidance provides sector-specific information on worker exploitation and can be a helpful tool.

ESG & supplier

Identify the processes and measures in place for carrying out due diligence on your contractors.

Do you conduct a third party supplier audit? A robust supply chain audit programme to organise and streamline diligence process.

Do your suppliers align with anti-slavery laws/practices? Do they have modern slavery policies? organisation engaged? encourage best practice.

Monitoring & control

Ensure that the policy covers relevant national and international and regulations relating to slavery – e.g. UK Modern Slavery Act

Commit to an ongoing reviewing and improving ensuring it stays up to date with best practices and legislative changes. Detail the methods used

Align the policy, including internal controls, and other processes.

Legislation, internal policies & statements

Identify applicable internal policies (Whistleblowing policy; Anti-bribery policy; Grievance policy; Third Party Engagement / Procurement Policy; Recruitment Policy. Modern Slavery Policy applicable.

Identify applicable legislation and resources, including the [UK Slavery Act](#) and [Modern Slavery Act 2015](#)

Procedures & Actions

Procedures for investigating modern slavery and the process to substantiated



This includes your whistleblowing procedure, where you explain how employees and others can raise concerns or suspicions about modern slavery. Include a commitment to no retaliation with regard to others who report their concerns from retaliation.

You can find guidance on how to respond to incidents of modern slavery in the [practical guide](#) from the UK Government, in section 4.2.

Training & awareness

How does your organization train employees, suppliers, and other stakeholders about their role in preventing modern slavery?

Measuring impact

Outline which key performance indicators (KPIs) will be used to measure the effectiveness of your efforts to combat modern slavery. Relevant KPIs are the number of supplier audits, number of slavery-related incidents in your supply chain, or the number of modern slavery cases.

The relevant KPIs will vary by sector. For example, if you manufacture goods, your supply chains should be monitored for other KPIs (i.e., around safety and production targets) and workers further down the supply chain who are vulnerable to modern slavery. If instances are identified, remediation should be put in place and your policy updated.

Regularly report on your progress.



What's Slavery

As with a Modern Slavery Statement, the contents of your Modern Slavery Statement will depend on your business and its supply chain.

The [UK Modern Slavery Act](#) outlines that a Modern Slavery Statement may contain information about:

- A. the organisation's business and its supply chain;
- B. its policies in relation to slavery and human trafficking;
- C. its due diligence processes in relation to slavery and human trafficking in its business and supply chain.

Modern Slavery include?

As a business and supply chain, there is a risk of slavery and human trafficking taking place, and the business must take steps to assess and manage these risks.

It is important to focus on ensuring that human trafficking is not used in business or supply chain, and to take steps against such activities, including identifying and reporting on indicators as it considers appropriate.

Businesses should also focus on slavery and human trafficking in relation to its staff.



All in all, both a Modern Slavery Statement and a Policy can point the positive direction, with tangible actions, vetting suppliers and seriously, they can be bringing social change.

Especially for firms who are required to engage with voluntary participation in ESG practice and which will align closer with your set you apart as an ethical business.

The ESGmark® Team, Community Members and assistance for your Modern Slavery Statement. Please find these in the and to request assistance us at info@esgmark.com happy to help.



Resources

GOV.UK - [UK Modern Slavery Chains etc. A practical](#)

[Gangmasters & Labour](#)

[Office For National Statistics](#)

The Chartered Governance [governance can do](#)

Human Rights Watch - [Human](#)

Walk Free - [Eradicating](#)

Anti-Slavery - [Slavery](#)

International Labour Office

Unseen - [Business Impact related](#)

Know the Chain



[Transparency in Supply](#)



[slavery - what corporate](#)



[Modern Slavery, 2022](#)

[Modern slavery - how they are](#)



We hope this paper has discussed it further with you

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