

# Modern slavery workshops

WORKSHOP TWO

## Businesses

## Dear Colleague,

**You are receiving this pack in your role as Coordinator of a Modern Slavery Partnership.**

Cases of modern slavery have been identified in every part of the UK. Whilst the general awareness of modern slavery has risen in recent years, for frontline practitioners it's not always obvious how to respond to particular situations of entrapment and exploitation. These can be very different from each other, for example, a British teenager forced to smuggle drugs will need different support to a migrant worker exploited in a factory.

It is important that people working in local organisations, from health professionals to social workers, police officers, businesses, charity and community organisation workers, know not only how to respond to potential cases, but also know who else to involve to make sure people affected get the comprehensive support they need.

This resource pack has been developed for regional Modern Slavery Partnerships to host five workshops, each aimed at a different target audience. You may choose to run all the workshops, or just a selection, depending on the current need in your region. Please feel free to run each workshop as many times as you wish.

In each workshop, the attendees work in partnership through a realistic scenario of modern slavery, allowing them to learn about current gaps and best practice in your region and to ensure a joined-up approach across the locality of your Modern Slavery Partnership. Whilst we have tried to use realistic scenarios and provide corresponding advice, the examples are illustrative and should not be seen as prescriptive. Each workshop is accompanied by a package of handouts which simplifies the most relevant policies and legislation to help improve victim support.

Whilst the workshops will be of benefit to a large range of organisations, their success rests on being undertaken alongside other local partners in order to develop the most effective, wrap-around response to modern slavery. This is why we strongly recommend using these workshops only through the regional Modern Slavery Partnerships, which can guide and coordinate local partners to a cohesive practical response.

**For any questions, please contact Dr Alicia Kidd: [Alicia.kidd@hull.ac.uk](mailto:Alicia.kidd@hull.ac.uk).**

**Proposed agenda:**

# Modern slavery workshop – businesses

<b>8.30am</b>	Refreshments and registration
<b>9am</b>	Welcome and summary of the day
<b>9.10am</b>	Opening speaker
<b>9.20am</b>	Breakout and introductions
<b>9.30am</b>	Scenario part one
<b>9.45am</b>	Feedback part one
<b>10am</b>	Scenario part two
<b>10.20am</b>	Feedback part two
<b>10.35am</b>	Scenario part three
<b>10.55am</b>	Feedback part three
<b>11.10am</b>	Coffee
<b>11.20am</b>	Scenario part four
<b>11.35am</b>	Feedback part four
<b>11.50am</b>	Scenario part five
<b>12.10pm</b>	Feedback part five
<b>12.25pm</b>	Summary, questions and evaluation forms
<b>12.45pm</b>	Close



### Sign-in sheet

Organisation	Name (alphabetically by first name)	Group Number	Signature

## Guidance document

This workshop is aimed at businesses who are based in the region covered by your Modern Slavery Partnership. The workshop revolves around working through a scenario of a potential real-life situation that UK businesses would have to deal with. The number of attendees you invite depends on your venue, but for the most effective conversations we recommend having 2-4 break out groups (ideally in separate rooms) with around 8-12 people in each. There should be a separate person to act as a facilitator for each group. While knowledge of the topic is not essential, ideally these facilitators would have facilitation experience. If there are multiple attendees from one business then we recommend splitting them into different break out groups.



Once attendees are confirmed, the groups should be allocated. In the accompanying PDF, there is a sign-in sheet which will need printing ahead of the workshop. There is a column in this sheet to make a note of which group each attendee is allocated to. This should be clarified with attendees on arrival, and they should remain in the same group for the duration of the event. We suggest inviting a key business partner to act as the opening speaker.

The scenario is split into five main parts. Once the groups have separated for their first break out session, the facilitators for each group should read out Scenario Part One to their groups and invite them to discuss the scenario (i.e. all groups discuss the same part of the scenario at the same time). The purpose of the facilitators is not to tell their group how to deal with the scenario, but to encourage conversation between the group members so that they can tackle the problem (attendees are not expected to fully resolve the scenario, just to identify what their best response to the information provided would be). There may be a requirement for the facilitators to make suggestions of ideas that people may not have considered, or to steer the conversation either if it gets off track, or if time is getting short. Facilitators should make note of any best practice and any actions or gaps that need to be dealt with. It is suggested that these actions are raised and allocated at your next Modern Slavery Partnership meeting.

Each group will work through Scenario Part One, then everyone should come back together to feed back. The feedback sessions should be facilitated by the Coordinator of your Modern Slavery Partnership. You might choose to ask one group to feed back after each session, or you may prefer to ask for a couple of key points from each group. The feedback sections of this document offer a list of suggested discussion points for each feedback session. The person facilitating the feedback sessions should raise some of these points for open conversation, then run through the 'Advised Action' section, allowing time for discussion.

The groups will then break out for Scenario Part Two and come back to feed back, and so on. At the end of the event there should be time for questions and for attendee evaluation forms to be completed. These evaluation forms are for you to keep to help in the development of your partnership and in identifying the needs of partners. There is also an evaluation form about the success of the workshop for you to complete and return to us.

## Equipment

- You may want to provide name badges if people haven't worked together before.
- You will need flipchart paper and pens to take notes from each group.
- You may need PowerPoint facilities if any opening speakers require them.
- You may wish to print and photocopy the scenarios so there are a few hardcopies available for each group. A photocopy symbol  has been included at the top of relevant pages in this document.
- You will also need to print and photocopy the package of handouts at the end of this workshop along with the Evaluation Form for Attendees, so that all attendees have access to them on the day. The photocopy symbol  marks the relevant pages. Please keep these evaluation forms; they are to help you to identify any potential needs or actions to be addressed by your Modern Slavery Partnership.



## Scenario part one

Allow time for introductions.

One of your staff members comes to you with concerns about one of the workers. He seems to be wearing the same clothes every day and doesn't seem to be washing.

### Things to consider:

- Does this cause you any concern?
- What action, if any, do you take?

## Feedback part one

### Discussion points:

- Does the fact that someone is wearing the same clothes every day cause you concern?
  - It may be nothing more than a case of poor personal hygiene
  - It could be a sign that they don't have enough time to wash their clothes
  - However, it could be a sign that they don't have the facilities to wash their clothes or money to buy more than one set

### Advised action:

- Thoroughly check your HR systems to gather as much information as possible about this worker. Useful things to check: What is his job and where does he work in the company? Is he an agency worker or directly employed? Has he signed a contract? Who is his next of kin? Where does he live? Do any other workers live at the same address? Can he speak English? What is his wage? Is he paid directly into his own bank account?
- Inform HR/Ethical Team of the concerns; they should begin making records of all the information gathered.
- It is essential the worker or others potentially connected with the situation are not aware of the tip off as this would risk them removing themselves from the situation before support (if required) has been put in place.
- Be prepared that if this does transpire to be a situation involving exploitation, there is a likelihood that there will be more than one victim.

### Potential further action:

- To verify whether there is any weight behind the concern, try to validate the information you've been given.
  - Check CCTV footage of the individual in question to try to identify whether there is anything else that may be of concern. While CCTV footage may only be of the perimeters of the buildings, this may allow you to collect information on who they travel to work with and how they get to work – including whether they are being dropped off and collected by someone else.
  - You should limit the number of people who know that you are checking the CCTV.
  - You should think about where you are going to store the CCTV. If this case progresses to cause concern, then this would become documentary evidence which could later be used in court. You will need to keep track of the evidence.





## Scenario part two

The HR checks show that this worker is an agency worker. You check the sheet that logs all the workers' hours. It says the worker in question works exactly 40 hours per week, Monday to Friday, 9am–5pm. Looking through the paperwork, it says the same thing every week for the past three months – when the worker started. However, you have been on site for the previous two weekends and remember the individual working on both Saturdays.

### Things to consider:

- What do you do next?
- Do you have concerns about anyone else?
- Should you speak to him?
- Why aren't his hours being properly recorded?

## Feedback part two

### Discussion points:

- The worker is working hours that aren't being logged.
- Who is signing workers in and out? The fact that the worker has been working weekends that haven't been included on the timesheet suggests that someone else is filling in the timesheet for workers. This could just be an oversight if it is presumed that workers are working the same shifts every week. However, it could be an issue to raise with the management of the site.

### Advised action:

- If your business is one in the Gangmasters and Labour Abuse Authority (GLAA) licensing sector (processing and packaging of all fresh food, drinks and other produce, agriculture, horticulture, shellfish gathering), ensure that the labour supplier has a licence via an active check with the GLAA.
- If your business is not in the GLAA licensing sector, you should report this information to the Employment Agency Standards Inspectorate.
- Based on the HR and CCTV checks, you should now have built up a picture of who the worker is.
- Make a note of the times you have seen him on site that don't correspond with the timesheets.
- Do not speak to the worker about your concerns; you don't yet have enough evidence to know that there is an issue or – if there is – to confirm that he is not an exploiter himself.
- Check whether the workers are signing themselves in and out or if someone else is doing it for them.
- If possible, compare CCTV footage to rotas to identify if the people working are the people who are meant to be working and if there are any patterns.
- Safeguarding should always be the priority.



## Scenario part three

You check CCTV footage and corroborate that the worker had been working on Saturdays, even though his timesheet does not have him working at weekends. He is being paid by your company via the agency for 40 hours per week, which corresponds to the hours on the timesheets. With the information about the worker having been working on Saturdays but not being paid for them, you suspect that he is substituting for another worker by taking the place and identity of another agency worker who is being paid for this Saturday work.

The CCTV footage also confirms the concern raised by the staff member that the worker is wearing the same clothes every day. You continue looking through the CCTV footage and identify that the worker arrives every morning with two other workers – they are dropped off in the car park and picked up together at the end of the day. They spend their break times together but have no food at lunch times.

### Things to consider:

- How can you verify your concerns?
- How can you check if this is happening with other workers?
- What action do you take regarding this substituting of labour?
- What do you take from the fact that he is always in the same clothes?
- What do you take from the knowledge that he arrives and leaves with the same people?
- Should you be concerned that the workers are being dropped off and collected by another person?
- Should you be concerned that they don't bring lunch?

## Feedback part three

### Discussion points:

- Introduce the work of the Gangmasters and Labour Abuse Authority (GLAA) – who they are, what to do and when to report to them (see handout).
- Introduce the Employment Agency Standards Inspectorate (see handout).
- Is there a way you can provide food to these workers without making it known that you are concerned for them?
- There is a possibility that the other workers he arrives and leaves with are being exploited too, or are potentially exploiters themselves.

### Advised action:

- Use your systems and CCTV to identify who the people are that the worker is arriving with as they may also be at risk (or part of the problem).
- Check records to see if there is someone else who is being paid for those Saturday shifts but who hasn't actually been on site.
- The Technical Manager or Site Supervisor should be able to identify any discrepancies between workers on the timesheet and those working the shifts.
- Check that the photos on contracts correspond to the people who are turning up to shifts.
- Access older files to understand the timescales of the issue – has it only been happening for the last three months, or for much longer with other workers? Do those timescales coincide with any particular staff?
- You should try to establish these facts without alerting the workers to the fact that you are doing so.
- Once you have gathered information, you should be able to identify whether this worker is substituting for another worker
  - If he is, protect the evidence and your staff and report your findings to the GLAA.
  - If he is not, continue to gather evidence and monitor the situation.
- Before you report on this, ensure your senior team challenges the evidence and helps you decide whether you SHOULD report at this stage. Try to understand the ramifications of the next step. For example, if you don't know the full extent of the issue, there is a risk of a wider exploitative gang being dispersed if authorities come in, meaning you won't reach all the people that need help.
- It is advisable to start establishing relationships with support agencies like local police, the local authority, GLAA, the Employment Agency Standards Inspectorate and Crimestoppers before you have to rely on them.

In order to get ahead of situations such as this one, the GLAA recommends implementing a worker interview strategy which involves regular face-to-face conversations with workers and will help to identify any potential issues (see handout).



## Scenario part four

1) You have now reported your concerns to the GLAA and the Employment Agency Standards Inspectorate who have asked if it's possible for you to speak to the worker to find out more about the situation.

### Things to consider:

- How and where should you conduct the conversation?
- Do you need an interpreter?
  - If so, where will you source one from?
  - Could you use another worker to translate?

2) During the conversation, the worker tells you that he is living in a house with seven other people and no running water. He tells you he works six days per week and gets £10 in cash at the end of every week, so he can't afford new clothes. He doesn't have access to his bank account. You check your systems and confirm that your company is paying the agency his wage for 40 hours per week. You pass this information on to the GLAA and they take over the case.

- What would you do next?

## Feedback part four

### Discussion points:

- Do you have a suitable space to hold this conversation?

### Advised action:

- Try and find a time to have the conversation that will not alert other people to the fact that it's happening, e.g. don't take him out in the middle of a shift.
- This conversation with the worker forms part of your due diligence. The GLAA will be able to offer you guidance.
- Ensure that the conversation is conducted in private and that no one sees it is happening. It is worth identifying a suitable space imminently so you know there is a place for such conversations to be conducted should it ever be required.
- **Do not use another staff member as an interpreter** – you don't know who else is involved at this point.
- Use a language telephone service.
- Ideally two staff members should be present when speaking with the worker so one can take notes. Identify who those people should be and who will take which role.
- Ensure you have as much information as possible about the worker prior to the conversation (from HR and CCTV checks for example).
- Ideally, no one else should be aware that this interview is happening at all, in case information gets back to the exploiters who disperse the gang before the authorities have had chance to intercept.
- Keep the conversation as short as possible, just using key questions to get all the information you need. Again, GLAA can offer advice on this.
- If the worker needs immediate safeguarding, then you should call the police.
- Be prepared for the possibility that the worker could confirm that they are in trouble but don't want help. You could still report this anonymously to the GLAA or the Employment Agency Standards Inspectorate.

**Once the GLAA or the Employment Agency Standards Inspectorate take over the case, your job is to support the investigation. You should:**

- Protect the evidence. Record, date and securely store anything you are told.
- Protect your staff. Any staff that are aware of the case must not discuss it with anyone else.
- Protect the victim. If the exploiters are NOT aware of the report, and the authorities are unable to attend immediately, then the best protection is to return the worker to the status quo until the authorities arrive. This enables the time to get all of the resources together without raising suspicion with the exploiters.
- If the authorities can attend straight away, then safeguard the victim until their arrival.



## Scenario part five

The press have picked up on the case and have reported that your business has been hiring workers from a supplier that has been exploiting them.

### Things to consider:

- Do you respond to these media reports?
  - If so, how?
- Will there be any impact on your customers/stakeholders?
- How do you proceed with the supplier?
  - Would you end the contract with them?

Now you have experience of this happening, what processes would you put in place in case something similar happens again?

## Feedback part five

### Discussion points:

- What are the pros and cons of responding to the media reports?
  - It could be better to flag to the media that you have found a situation and are handling it than letting the media control the situation. You could spin it into a positive that you are proactively investigating your supply chains.
  - You can tell the media that you're unable to talk about a case that is currently being handled for risk of jeopardising it.

### Advised action:

- You should have a media policy in place before it is required and this should be discussed during crisis response meetings.
- If relevant, undertake a GLAA 'active check' on the labour supplier. This will keep you informed of any changes to the labour supplier's GLAA licence.
- Comms teams need to be linked in as soon as an issue is identified and decisions need to be made about any partners that need to be informed before any media response.
- Arrange a meeting between yourselves, GLAA, the Employment Agency Standards Inspectorate and your customers/stakeholders to plan for the next steps. This shows to your customers/stakeholders that you are keen on a positive solution and have been a key part in supporting the workers throughout the process.
- While it can seem logical to end the contract with the supplier, this risks further exploiting anyone currently being controlled by them. Instead, provide the supplier with a list of requirements and a date by which they must meet them. Only if significant progress has not been made towards those requirements by that date should the contract be ended.
- Pathways
  - Consider advertising methods for reporting issues anonymously, such as posters with the Crimestoppers website and phone number.
  - Make sure that your pathway for dealing with such situations is made clear to all staff and they have easy access to relevant phone numbers in case of an emergency.
- Staff knowledge
  - Make it known that you can help a potential victim.
  - Provide staff with information on what their entitlements are (minimum wage, not being charged for finding work etc.).
  - Do not share your tactics for identifying and supporting potential victims (because with this knowledge, the exploiters will then be one step ahead).
  - Conduct regular worker interviews (see handout).



## Summary

### 1. Open to the audience:

- Are there any questions about the scenario?
- Is there anything from today that will lead you to make a change in your organisation?
- Is there anything you need more advice on?
- Have you identified any gaps in provision that need to be tackled?

### 2. Actions:

- Have any actions been identified today that need to be addressed?
- We recommend that any actions arising from the workshop should be discussed at your next Modern Slavery Partnership meeting.

### 3. Closing points:

- Ask everyone to fill out the attached evaluation form.
- Closing comments.

The page features a solid blue background with several abstract, white, hand-drawn style lines. These lines form loops and curves that sweep across the page, framing the central text. One line starts from the left edge, loops upwards and then downwards, crossing itself. Another line starts from the top left, loops across the top, and then curves down towards the right. A third line starts from the bottom left, loops upwards and then downwards, crossing itself. A fourth line starts from the right edge, loops upwards and then downwards, crossing itself.

**WORKSHOP TWO**

# **Handouts**



## Gangmasters & Labour Abuse Authority

### Who we are

The Gangmasters and Labour Abuse Authority (GLAA) is the foremost investigative agency for labour exploitation in the UK. We work in partnership with law enforcement bodies to protect vulnerable workers and disrupt organised criminality in the labour market.

Across the UK, we have positive existing relationships with many Modern Slavery Partnerships which we are keen to build on. We fully support your work and believe there are lots of areas where we can work together to uphold workers' rights and bring those responsible for exploitation to justice.

### Our powers and remit

We were created following the 2004 Morecambe Bay cockling disaster to prevent the exploitation of workers in the fresh produce sector. In 2017, we were rebranded and given new powers to also investigate labour exploitation offences, including the forced or compulsory labour element of modern slavery, across England and Wales.

We operate a licensing scheme, regulating businesses who provide workers for agriculture, horticulture, shellfish gathering and food production, to make sure they meet the employment standards required by law.

Labour providers are assessed to check they are meeting our licensing standards which cover health and safety, accommodation, pay, transport and training. We also investigate and prosecute unlicensed gangmasters.

In England and Wales, we use our new powers to investigate forced or compulsory labour and human trafficking offences. We also utilise powers under the Immigration Act 2016 to issue Labour Market Enforcement Undertakings (LMEUs) and Labour Market Enforcement Orders (LMEOs) which can be used as an alternative or additional sanction for breaches of labour market legislation..

### Prevention and partnerships

We are aware that we simply cannot arrest our way out of the problem of labour exploitation. In the long-term, prevention will have the biggest impact in raising awareness and driving the real business and consumer change needed to ensure the wider public accepts that exploiting people for their labour is completely unacceptable.

We have active protocols currently in construction and textiles, with plans in place for a further industry-led protocol covering the hospitality sector.

### Report your concerns

- By telephone on 0800 4320804
- By email at [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)
- Through our website <https://www.gla.gov.uk/>
- To the Modern Slavery Helpline on 08000 121700



## Gangmasters (Licensing) Act 2004

The Gangmasters (Licensing) Act 2004 established the Gangmasters Licensing Authority (now renamed the Gangmasters and Labour Abuse Authority - GLAA) to set up and operate the licensing scheme for labour providers operating in the regulated sectors in the UK. These include agriculture, horticulture, shellfish gathering, and any associated processing and packaging. It also created the offences of acting as an unlicensed gangmaster and using an unlicensed gangmaster. The GLAA is a non-departmental public body sponsored by the Home Office, and also reports to the Director of Labour Market Enforcement. It issues licences and ensures compliance through inspections.

Gangmasters must meet required standards to be licensed, and are assessed for health and safety, accommodation, pay, transport and training. The GLAA checks that they are fit to hold a licence and that tax, National Insurance and VAT regulations are met. It is a criminal offence to supply casual workers without a licence or to use an unlicensed labour provider.

The Act creates a number of offences with heavy penalties. Under S12(4) offenders can face 10 years' imprisonment for operating without a licence. Under S13, people who deal with unlicensed gangmasters can face 51 weeks jail, unless they can show they took all reasonable steps to establish that the gangmasters were licensed.

[www.legislation.gov.uk/ukpga/2004/11/contents](http://www.legislation.gov.uk/ukpga/2004/11/contents)

# Advice from the Gangmasters and Labour Abuse Authority (GLAA)

In order to stay ahead of situations like the one outlined in this workshop, best practice as suggested by GLAA is for companies' HR departments to conduct worker interviews at regular intervals, at least every three months. While audits are useful for identifying some issues relating to the operating of sites, they don't interact with workers on a one-to-one basis, which is why individual interviews can be so valuable. Getting to know your workers is a way of showing that you are proactive about due diligence.

This process does not have to be overly complex or onerous, but it should be introduced as a matter of organisational requirement, so workers understand that any interviews are simply standard practice. If your company is supplied by agency staff, then the interviews allow the opportunity to better understand the process of their recruitment and enable you to identify any obvious issues in your supply chain.

## The process:

1. Workers should be spoken to on an individual basis in a private area where conversations won't be overheard.
2. Ahead of time, ensure you know if there are any potential language barriers. If there are, you should not use another worker as an interpreter, but use the services of a dedicated telephone interpreting service. You should ensure that you have budgeted for this expense.
3. The person leading the interview should make it clear that all workers are interviewed and that this is standard practice. This helps to remove suspicion when workers are taken aside for these interviews.
4. The interview should take the form of a casual conversation, with some specific questions embedded within it.
5. Questions to cover include, for example:
  - How did you get this job?
  - Did you have to pay for work?
  - Do you owe anyone any money?
  - Where do you live?
  - How did you find the accommodation?
  - How do you get paid?
  - Do you have access to your own bank account?
6. If, during the interview, the workers mention anything that causes concern, or are unable to answer any of the questions, then do not probe them.
7. If any issues become clear then safeguarding should be the first priority. If more than one indicator for exploitation becomes evident, then you should contact GLAA for specific advice.
8. If a worker does not want to engage, or refuses to answer questions, then this is indicative that further enquiries should be made regarding this worker and their circumstances.

# Health and Safety at Work etc. Act 1974

Arguably this legislation set out how businesses must ensure the “health, safety and welfare” of people on their premises long before the Modern Slavery Act 2015 made its explicit provisions. The wide ranging duties it imposes on businesses apply not just to employees but also to anyone else on their premises, including temporary staff, casual workers, the self-employed, clients, visitors, and the general public.

## The duties that the Act imposes include:

- a safe system of work
- a safe place of work
- safe equipment, plant and machinery
- safe and competent people working alongside you, because employers are also liable for the actions of their staff and managers
- carrying out risk assessments as set out in regulations, and taking steps to eliminate or control these risks
- informing workers fully about all potential hazards associated with any work process, chemical substance or activity, including providing instruction, training and supervision
- appointing a ‘competent person’ responsible for health and safety (competent persons, such as a head of health and safety, oversee day-to-day safety management, oversee safety inspections, and liaise with staff safety reps)
- consulting with workplace safety representatives (if a union is recognised, your employer must set up and attend a workplace safety committee if two or more safety reps request one)
- providing adequate facilities for staff welfare at work.

The Act is the basis of many Approved Codes of Practice (ACOPs) for businesses, which set out detailed responsibilities for business with regard to all aspects of workplace health and safety, from working safely with computers, to stress and hazardous chemicals. The Act also provides the basis for some regulatory powers that can assist in the identification and disruption of modern slavery, such as powers of entry (Section 20). This gives local officers the power to enter a business premises and request to examine any document, equipment, premises or part of them, and detain any articles or substances. The authorised officer has the right to enter at any reasonable time upon producing documented authorisation and may be accompanied by the police.

The Act established the Health and Safety Executive (HSE) and contains powers for the HSE to be able to enforce these duties and to issue penalties for failure to comply.

[www.legislation.gov.uk/ukpga/1974/37](http://www.legislation.gov.uk/ukpga/1974/37)

# International Labour Organization Protocol of 2014 to the Forced Labour Convention, 1930

This international protocol supplements the Forced Labour Convention, 1930 (No. 29), and provides specific guidance on effective measures to be taken to eliminate all forms of forced labour. It requires national government to take measures to better protect workers, in particular migrant labourers, from fraudulent and abusive recruitment practices and emphasises the role of employers and workers in the fight against forced labour.

The primary obligation of the protocol is for government to not only criminalise and prosecute forced labour, but also to take effective measures to prevent forced labour and provide victims with protection and access to remedies, including compensation. It also sets out a number of provisions within that, which include:

## Prevention (Article 2)

- Educating and informing those considered vulnerable, employers, and the wider public.
- Extending the coverage and enforcement of relevant laws to all workers and sectors.
- Strengthening labour inspection services and others responsible for implementation of these laws.
- Protection from abuses arising during the recruitment process.
- Supporting due diligence by the public and private sectors.
- Addressing root causes and factors that heighten the risks of forced labour.

## Protection (Article 3 and 4(2))

- Effective measures for the identification, release, protection, recovery and rehabilitation of victims.
- Protecting victims from punishment for unlawful activities that they were compelled to commit.

## Implementation and consultation (Article 1(2))

- Development of a national policy and plan of action in consultation with employers' and workers' organisations.
- Systemic action taken in coordination with these organisations as well as with other groups concerned.

[www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:P029](http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:P029)

# Modern Slavery Act 2015: Section 54 – Transparency in Supply Chains

Section 54 of the Modern Slavery Act 2015 brought into force the Transparency in Supply Chains Regulations with effect from 29 October 2015 - with the new measures applicable to financial years ending on or after 31 March 2016.

The main requirement of the act is for any commercial organisation with a global turnover of at least £36 million which undertakes a business, or part of a business, in the UK, to produce and publish a slavery and human trafficking statement for each financial year.

Whilst the regulation is not prescriptive on what must be included in the statement, it suggests some types of information that may be included:

- Details of the organisation's structure, business and supply chains
- The organisation's policies in relation to slavery and human trafficking
- The due diligence processes the organisation undertakes in relation to its business and supply chains
- Identification of those parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking occurring, and the steps it has taken to identify and address those risks
- The training available to the organisation's staff about slavery and human trafficking
- The organisation's effectiveness, year-on-year, in ensuring that slavery and human trafficking is not taking place in its business and supply chains (measured against those performance indicators it considers appropriate)

The statement must be published on the business's website (if applicable), with a clearly marked link to the statement in a prominent place on the homepage. Where an organisation has more than one website, the statement, or a link to it, must be included on each website. Businesses without a website must provide a copy of the statement to anyone who requests it within 30 days of a request being made.

Failure to comply with the regulation opens up a business to enforcement proceedings seeking an injunction from the Secretary of State. If the organisation fails to comply with the injunction, then it will be in contempt of court and liable to an unlimited fine.

Businesses with a turnover below £36million may still be required to produce a transparency statement as part of procurement processes within their supply chain, as the larger businesses seek to comply with the regulation.

[www.legislation.gov.uk/ukpga/2015/30/section/54](http://www.legislation.gov.uk/ukpga/2015/30/section/54)



# Employment Agency Standards (EAS) Inspectorate

The EAS Inspectorate is the regulator of employment agencies and employment businesses, and enforces the laws that protect agency workers, including the Employment Agencies Act 1973, and the Conduct of Employment Agencies and Employment Businesses Regulations 2003. It is a part of the Department for Business, Energy and Industrial Strategy (BEIS). The inspectorate provides guidance on what employment agencies and businesses must and must not do, differentiating between **employment agencies** who introduce persons to employers, and **employment businesses** who find temporary and contract work.

An important part of an **employment business** is to provide workers with a Key Information Document (KID), intended to outline pay related facts and other details about an engagement. An **employment business** must agree terms of engagement before starting any work-finding services, and these terms should include:

- Worker status i.e. employee or self-employed
- The notice period to end an assignment
- The minimum rate of pay
- Any entitlement to paid holidays

Regarding specific opportunities, both **employment agencies and businesses** must outline to the worker:

- The start date and how long the contract may last
- The identity of the hirer
- The duties to be undertaken
- Details of any expenses
- The location and hours of work
- Any health and safety risks
- Any experience, training or qualifications needed for the role

Both **employment agencies and businesses** must confirm evidence of a worker's identity, such as a passport, driving licence or birth certificate.

Both **employment agencies and businesses** must not:

- Charge fees for providing work-finding services
- Force workers to purchase any additional services such as training or CV-writing
- Tell a current employer that a worker is looking for new work
- Stop a worker from working elsewhere
- Force a worker to tell them the identity of any future employer
- Withhold payments or wages for hours that have been worked

Whilst **employment agencies and businesses** cannot charge a fee for finding work, they can provide or refer workers to other paid services, such as a Disclosure and Barring Service (DBS) check, or an umbrella company. In these instances, detailed information must be provided up front about the cost and terms of these services, including rights, and the notice period required to cancel.



### Evaluation form for attendees

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Today was relevant to me					
The scenario was useful					
Today was good for networking					
My knowledge on how to respond to modern slavery has improved today					
From today, there are changes that need to be made in my organisation to make sure we deal with modern slavery more effectively					
I know who to talk to if I need support or guidance on modern slavery					

If the workshop identified changes you need to make within your organisation, please provide some details:

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Does your organisation require any further assistance from your regional Modern Slavery Partnership regarding modern slavery? Please leave a contact email if you'd like someone to get in touch about this.

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Email Address:

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Any further comments about the workshop:

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## Evaluation form for Modern Slavery Partnership Coordinators

After the workshop, please fill this out and email a copy to Alicia Kidd at [Alicia.kidd@hull.ac.uk](mailto:Alicia.kidd@hull.ac.uk)

1. Which workshop did you run?

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2. What date did you run the workshop?

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3. How many people attended the workshop?

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4. Did the workshop help engage partners that you have not previously worked with? If so, which partners?

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5. Did you identify any new examples of best practice through the workshop? Please give details.

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6. Did you identify any gaps in provision through the workshop? Please give details.

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7. Was there anything you felt was missing from the workshop? Please give details.

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8. Was there anything you would change about the workshop? Please give details.

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9. Are you likely to run the workshop again?

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10. Please provide some of the key pieces of feedback that came from the attendees.

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11. Any other comments.

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This project was led by Dr Alicia Kidd from the Wilberforce Institute at the University of Hull and was supported by Dr Phil Northall of the Rights Lab at the University of Nottingham; Frank Hanson, Head of Prevention and Partnerships at the Gangmasters and Labour Abuse Authority; Shayne Tyler, Group Compliance Director at Fresca Group; and Andrew Smith, Coordinator of the Humber Modern Slavery Partnership.

All content is accurate as of 26/08/20.

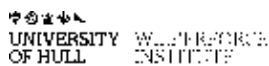
For any comments or questions, please contact Dr Alicia Kidd:  
[Alicia.kidd@hull.ac.uk](mailto:Alicia.kidd@hull.ac.uk), or the Modern Slavery PEC on  
[office@modernslaverypec.org](mailto:office@modernslaverypec.org).

## MODERN SLAVERY & HUMAN RIGHTS

POLICY & EVIDENCE CENTRE

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