Modern Slavery Assessment V.2

Welcome

You are **0%** through this questionnaire

Welcome to the Modern Slavery Assessment

► Modern Slavery Definition

> Modern Slavery is an umbrella term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.

Modern slavery is a serious and organised crime that destroys communities and causes significant harm to victims. It is the illegal exploitation of people for personal or commercial gain, and involve people being coerced and forced into providing a service to others. Some estimates suggest that there were over 40 million people living in slavery across the world in 2016, many of whom will be working to produce the goods and services which we buy and sell every day. The Home Office estimated that there were 10,000-13,000 potential victims in the UK alone in 2013. It is a crime that affects men, women and children.

The Home Office estimates the total social and economic cost of modern slavery to the UK was £3.4 - £4.3 billion in 2016/17, making the average cost of a modern slavery crime (£334,750) higher than the unit cost of any other crime type apart from homicide. Worldwide, the International Labour Organisation estimates over USD $150 billion of illegal profits are generated by traffickers per year. Unscrupulous businesses who use slave labour undercut good British businesses and if we are to eradicate this horrendous crime from the UK and the rest of the world, government and businesses must work together.

► Why am I being asked to complete this assessment?

► How will the assessment help my organisation manage modern slavery risks?

► What is a Modern Slavery Statement?

► My organisation already produces a Modern Slavery Statement, why do I need to complete this assessment?

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Your organisation has been invited to complete the Modern Slavery Assessment to strengthen the processes your organisation has in place to prevent modern slavery in your supply chains. Your organisation may be supplying goods or services deemed to be at particular risk of modern slavery and/or have a high contract value with the buyer. By completing this assessment and working towards fulfilling the recommendations it provides, your organisation will be in a stronger position to mitigate these risks.

This assessment will help the buyer to assess the capacity of your organisation to manage and prevent the risks of modern slavery. The assessment will help the buyer work in partnership with your organisation to improve protections and reduce the risk of exploitation of workers in your supply chains. The Government understand all organisations are at different stages of their journey to having more ethical supply chains but expects to see organisations demonstrate continuous improvement in how they mitigate modern slavery risks. The assessment provides links to useful guidance and practical tools throughout to support how your organisation makes improvements.

- Will the data I provide be made public?
- Who should be completing the assessment and what information is required?

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Section 54 (Transparency in Supply Chains etc.) of the Modern Slavery Act 2015 requires applicable commercial organisations to publish a 'slavery and human trafficking statement' for each financial year of their organisation, otherwise known as a Modern Slavery Statement. It applies to all commercial organisations which carry on a business, or part of a business, in the UK, supply goods or services and have an annual turnover of £36m or more. Although devolved administrations have their own modern slavery and human trafficking legislation, this transparency provision applies to businesses across all of the UK.

The Modern Slavery Statement must set out what steps organisations have taken during the previous financial year to ensure that modern slavery is not taking place in their own organisation and supply chains.

The Government encourages organisations, including those that do not fall in scope of the Act, to complete this assessment so that organisations have a framework to aid them in their journey to understanding and addressing modern slavery risks. Once you complete the assessment, you will receive a report which will provide you with recommendations on how to improve your anti-slavery activity and help you draft your organisation's Modern Slavery Statement (if applicable). If your organisation has produced a good quality Modern Slavery Statement, you will be able to use most of the same information to complete this assessment.

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The answers you provide will be kept confidential and will only be shared with buyers that you have given permission to access. Once you complete the assessment, you will be able to amend the sharing permissions at any time if you want to remove a buyer or add a new one.

Anonymised data may be shared with the Home Office and Cabinet Office to inform the Government's strategy for addressing modern slavery risks in central government supply chains.

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> The individual completing this assessment should have a strong understanding of how your organisation manages modern slavery risks but will likely require input from different teams, such as procurement, corporate affairs, corporate social responsibility, HR, finance and legal.
>
> References to 'supply chains' are in relation to the supply chains for goods and services (including labour) your organisation is supplying to the buyer/s that have invited you to complete this assessment.
>
> References to your 'organisation' includes the goods and services not for re-sale and used by your organisation for operational reasons, such as cleaning, catering, IT and logistic services. The assessment is not asking for information on the supply chains for all goods and services your organisation supplies other organisations, although these supply chains can overlap. When producing a Modern Slavery Statement, organisations should be detailing information in relation to their highest risk supply chains.
>
> Your responses can be updated at any time to maintain a current and accurate report. The Assessment has six sections, each of which captures information that may be included in a statement, as set out in guidance to the Modern Slavery Act 2015.
>
> The buyer that invited you to complete the assessment will inform you how often they would like your organisation to complete this assessment.

1. Do you want to re-use answers from an existing Modern Slavery Assessment?

Re-use an existing Modern Slavery Assessment

Information about the business and its supply chains

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Where applicable, information about your organisation is taken from Dun & Bradstreet. Please change any incorrect details.

1a. Please enter your organisation details.

Full name of your company

DUNS number

Address Lookup

Street

Town or City

County or State (optional)

Postcode

Country

Country

Select a country

Day (DD)

Month (MM)

Year (YYYY)

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Registered company number

Registered charity number

Registered VAT number

Registered website address

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1b. Do you want to complete this Modern Slavery Assessment for your organisation as a whole or for a specific contract?

If you have been invited to complete a Modern Slavery Assessment by a Government buyer, please check their correspondence as they may have detailed how you should respond for the goods/service you provide to them.

- ◯ Organisation as a whole
- ◯ For a specific contract

Contract Name

Description

Day (DD) Month (MM) Year (YYYY)

Day (DD) Month (MM) Year (YYYY)

Contract Value

1c. Please select the relevant sector(s) that your organisation operates in.

- ☐ Accommodation and food service activities
- ☐ Activities of extraterritorial organisations and bodies
- ☐ Activities of households as employers
- ☐ Administrative and support service activities

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- [ ] Agriculture, Forestry and Fishing
- [ ] Arts, entertainment and recreation
- [ ] Construction
- [ ] Education
- [ ] Electricity, gas, steam and air conditioning supply
- [ ] Financial and insurance activities
- [ ] Human health and social work activities
- [ ] Information and communication
- [ ] Manufacturing
- [ ] Mining and Quarrying
- [ ] Other service activities
- [ ] Professional scientific and technical activities
- [ ] Public administration and defence
- [ ] Public sector
- [ ] Real estate activities
- [ ] Transportation and storage
- [ ] Water supply, sewerage, waste management and remediation activities
- [ ] Wholesale and retail trade
- [ ] Other

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Please specify

Do not know

1d. Are you a Small, Medium or Micro Enterprise (SME)?

Less than 250 workers and turnover below £50 million.

Yes No

2. Which of the following members of your group structure are you completing this assessment on behalf of?

My own organisation

Immediate parent
A company that directly owns more than 50% of your organisation

Please provide details of your immediate parent which include full name, DUNS number, address, country, registration number and VAT number.

Domestic parent
A subsidiary within the global family tree that is the highest-ranking member within a specific country

Please provide details of your domestic parent which include full name, DUNS number, address, country, registration number and VAT number.

Global parent
The top most responsible company in your corporate family

Please provide details of your global parent which include full name, DUNS number, address, country, registration number and VAT number.

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3. Who is your organisation's main point of contact for this assessment?

The main point of contact may be the person completing this assessment. They should also be the person responsible for future updates to the assessment.

> Please provide their name and contact details. You can edit the contact details below if they differ for the main point of contact

First name

Last name

Job title

Email

Telephone

Information about the business and its supply chains

You are **6%** through this questionnaire

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4. Please enter the turnover that is listed within your most recent set of annual accounts.

► What is the turnover requirement for reporting on modern slavery?

> Any organisation which conducts business, wholly or in part, within the UK and has a turnover of £36m or more is required to publish a statement.
>
> Turnover here is defined as the amount derived from the provision of goods and services falling within the ordinary activities of the commercial organisation. Further information can be found here.

Turnover in GBP

Day (DD) Month (MM) Year (YYYY)

Governance

You are **9%** through this questionnaire

5. Under Section 54 of the Modern Slavery Act 2015, is your organisation required to produce a Modern Slavery Statement?

► What is a Modern Slavery Statement and is my organisation required to produce one?

> Section 54 (Transparency in Supply Chains etc.) of the Modern Slavery Act 2015 requires applicable commercial organisations to publish a slavery and human trafficking statement for each financial year of their organisation.
>
> For the purposes of this assessment we are referring to a 'slavery and human trafficking statement' as a 'Modern Slavery Statement', other organisations may use different terms, such as 'anti-slavery statement'.
>
> Section 54 applies to all commercial organisations which carry on a business, or part of a business, in the UK, supply goods or services and have an annual turnover of £36m or more.

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The Government encourages organisations not in scope to consider publishing a statement as modern slavery risks can manifest in almost any organisation.

The Government provides a non-exhaustive list of information that may be included in a statement, which can be found here.

This Assessment captures this information in the following sections:

- Information about the organisation and its supply chains
- Policies relating to modern slavery
- The parts of its business and supply chains where risks of modern slavery are highest
- Due diligence processes in place to manage and prevent risks of modern slavery
- Training and capacity building of staff around modern slavery

Legally, the Modern Slavery Statement must set out what steps they have taken during the financial year to ensure that modern slavery is not taking place in their supply chains and in their own organisation. Statements must also:

1. Be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent)

2. If the organisation has a website, statements must be published on that website and a link to the statement must be placed in a prominent place on that website's homepage

3. If the organisation does not have a website, it must provide a copy of the statement to anyone who makes a written request for one within 30 days.

There are two repositories for modern slavery statements in the UK: TISC report and the Modern Slavery Registry.

Organisations should also consider publishing their statements on these registries so the public can more easily find them.

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Yes

Please upload the statement
You may only upload a single file.

Choose File No file selected Browse previous...

Yes but not produced a statement covering relevant yearly reporting period

Not required but have produced a statement

Please upload the statement
You may only upload a single file.

Choose File No file selected Browse previous...

Not required and no statement has been produced

Governance

You are **12%** through this questionnaire

6. Does your organisation's Modern Slavery Statement meet the following legal requirements? Tick all that apply

► Where do organisations need to publish their statement?

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The Act is clear statements must be published on an organisation's website with a link in a prominent place on the homepage. A prominent place may mean a modern slavery link that is directly visible on the home page or part of an obvious drop-down menu on that page. The link should be clearly marked so that the contents are apparent.

For organisations where there is more than one website we recommend placing the statement on the most appropriate website relating to the organisation's business in the UK.

Where there is more than one relevant website we recommend placing a copy of the statement or a link to the statement on each relevant website. This will increase transparency and ensure recognition for the efforts the business is making. There are two repositories for Modern Slavery Statements in the UK: TISC Report and the Modern Slavery Registry.

Organisations should also consider publishing their statements on these registries so the public can more easily find them.

- [ ] Approved by the board of directors (or equivalent management body)
- [ ] Signed by a director (or equivalent)
- [ ] Accessible via a prominent place on your website's homepage
- [ ] None of the above

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7. Does your latest statement include information on the following areas? Tick all that apply

► Guidance for information to include in your Modern Slavery Statement

> The government provides a non-exhaustive list of information that may be included in a statement, which can be found here.
>
> For a practical list of do's and don'ts, see the Local Government Association's Aide Memoire.

- [ ] Information about your organisation and supply chains
- [ ] Policies relating to modern slavery
- [ ] The parts of your business and supply chains where risks of modern slavery are highest
- [ ] Due diligence processes in place to manage and prevent risks of modern slavery
- [ ] Training and capacity building of staff around modern slavery
- [ ] Key performance indicators your business uses to measure progress in tackling modern slavery
- [ ] None of the above

8. Was your latest statement produced within 6 months after your last financial year end, as per Government guidance?

- ◯ Yes
- ◯ No

Please provide details why your statement was not produced within this time period.

Governance

You are **15%** through this questionnaire

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Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

9. Have any incidences of modern slavery been recorded or uncovered within your organisation or supply chains in the past 12 months?

► Incidences of modern slavery

> Sadly, modern slavery can exist in any supply chain and in any industry. Businesses should be transparent as possible about issues in their supply chains so contracting authorities can work with them to help rectify issues. It is good practice for organisations to refer to incidences in their modern slavery statements, see page 8 of the Co-op's 2017 statement for a case study example.
>
> These incidences may have been recorded through a formal mechanism or identified as part of labour standards reporting.

◯ Yes ◯ No

Please provide information about how your organisation identified modern slavery, where it was identified and what steps your organisation took afterwards, including any remediation

10. Has your organisation taken steps to map your supply chains to support how your organisation identifies modern slavery risks?

► Supply chain mapping

► Which supply chains?

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It is important for organisations to have a good understanding of their supply chains in order to properly identify areas of high risk.

Organisations should undertake a mapping exercise of their supply chains starting by collecting information about their tier 1 suppliers. Once organisations have mapped their tier 1 suppliers they should seek to collect information on lower tiers to help them understand where risks may be greater. Further guidance on how to map your supply chains, see the Supply Chain School's Guidance Protocol. For country and regional level modern slavery data see the Global Slavery Index.

References to 'supply chains' are in relation to the supply chains for goods and services (including labour) your organisation is supplying to the buyer/s that have invited you to complete this assessment. References to your 'organisation' includes the goods and services not for re-sale and used by your organisation for operational reasons, such as cleaning, catering, IT and logistic services.

The assessment is not asking for information on the supply chains for all goods and services your organisation supplies other organisations, although these supply chains can overlap.

◯ Yes ◯ No

Governance

You are **18%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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10a. How many tiers?

- [ ] Tier 1
- [ ] Tier 2
- [ ] Tier 3
- [ ] Tier 4
- [ ] Tier 5

Governance

You are **21%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

10b. Which locations do you believe are at higher risk of modern slavery in your operations and supply chains?

- [ ] No locations are considered to be at higher risk of modern slavery
- [ ] Afghanistan
- [ ] Albania
- [ ] Algeria
- [ ] Angola
- [ ] Argentina
- [ ] Armenia
- [ ] Australia
- [ ] Austria

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- [ ] Azerbaijan
- [ ] Bahrain
- [ ] Bangladesh
- [ ] Barbados
- [ ] Belarus
- [ ] Belgium
- [ ] Benin
- [ ] Bolivia, Plurinational State of
- [ ] Bosnia and Herzegovina
- [ ] Botswana
- [ ] Brazil
- [ ] Burkina Faso
- [ ] Brunei Darussalam
- [ ] Bulgaria
- [ ] Burundi
- [ ] Cambodia
- [ ] Cameroon
- [ ] Canada
- [ ] Cape Verde
- [ ] Central African Republic

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- [ ] Chad
- [ ] Chile
- [ ] China
- [ ] Colombia
- [ ] Congo
- [ ] Congo, Democratic Republic of
- [ ] Costa Rica
- [ ] Cote D'Ivoire
- [ ] Croatia
- [ ] Cuba
- [ ] Cyprus
- [ ] Czech Republic
- [ ] Denmark
- [ ] Djibouti
- [ ] Dominican Republic
- [ ] Ecuador
- [ ] Egypt
- [ ] El Salvador
- [ ] Equatorial Guinea
- [ ] Eritrea

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- [ ] Estonia
- [ ] Ethiopia
- [ ] Finland
- [ ] France
- [ ] Gabon
- [ ] Gambia
- [ ] Georgia
- [ ] Germany
- [ ] Ghana
- [ ] Greece
- [ ] Guatemala
- [ ] Guyana
- [ ] Guinea
- [ ] Guinea-Bissau
- [ ] Haiti
- [ ] Honduras
- [ ] Hong Kong, China
- [ ] Hungary
- [ ] Iceland
- [ ] Iceland

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- [ ] India
- [ ] Indonesia
- [ ] Iran, Islamic Republic of
- [ ] Iraq
- [ ] Israel
- [ ] Italy
- [ ] Jamaica
- [ ] Japan
- [ ] Jordan
- [ ] Kazakhstan
- [ ] Kenya
- [ ] Kora, Democratic People's Republic of
- [ ] Korea, Republic of
- [ ] Kosovo
- [ ] Kuwait
- [ ] Kyrgyzstan
- [ ] Lao People's Democratic Republic
- [ ] Latvia
- [ ] Lebanon
- [ ] Lesotho

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- [ ] Liberia
- [ ] Libya
- [ ] Lithuania
- [ ] Luxembourg
- [ ] Macedonia, the former Yugoslav Republic of
- [ ] Madagascar
- [ ] Malawi
- [ ] Malaysia
- [ ] Mali
- [ ] Mauritania
- [ ] Mauritius
- [ ] Mexico
- [ ] Moldova, Republic of
- [ ] Mongolia
- [ ] Montenegro
- [ ] Morocco
- [ ] Mozambique
- [ ] Myanmar
- [ ] Namibia
- [ ] Nepal

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- [ ] Netherlands
- [ ] New Zealand
- [ ] Nicaragua
- [ ] Niger
- [ ] Nigeria
- [ ] Norway
- [ ] Oman
- [ ] Pakistan
- [ ] Panama
- [ ] Papua New Guinea
- [ ] Paraguay
- [ ] Peru
- [ ] Philippines
- [ ] Poland
- [ ] Portugal
- [ ] Qatar
- [ ] Romania
- [ ] Russia
- [ ] Rwanda
- [ ] Saudi Arabia

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- [ ] Senegal
- [ ] Serbia
- [ ] Sierra Leone
- [ ] Singapore
- [ ] Slovakia
- [ ] Slovenia
- [ ] Somalia
- [ ] South Africa
- [ ] South Sudan
- [ ] Spain
- [ ] Sri Lanka
- [ ] Sudan
- [ ] Suriname
- [ ] Swaziland
- [ ] Sweden
- [ ] Switzerland
- [ ] Syrian Arab Republic
- [ ] Taiwan, China
- [ ] Tajikistan
- [ ] Tanzania, United Republic of

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- [ ] Thailand
- [ ] Timor-Leste
- [ ] Togo
- [ ] Trinidad and Tobago
- [ ] Tunisia
- [ ] Turkey
- [ ] Turkmenistan
- [ ] Uganda
- [ ] Ukraine
- [ ] United Arab Emirates
- [ ] United Kingdom
- [ ] United States
- [ ] Uruguay
- [ ] Uzbekistan
- [ ] Venezuela, Bolivarian Republic of
- [ ] Vietnam
- [ ] Yemen
- [ ] Zambia
- [ ] Zimbabwe

Policies, Procedures and Governance

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This section examines the principles, policies and governance frameworks that are in place to support your organisation's efforts to tackle modern slavery. Where relevant, questions will look to understand the following:

- Your organisation's principles with regard to modern slavery
- The policies which ensure these principles are enforced
- How this information is communicated across your organisation
- Your organisation's reporting responsibilities

11. Does your organisation have policies that are relevant to the prevention of modern slavery?

► What are modern slavery policies?

> Tackling modern slavery does not necessarily require a standalone policy. It could simply be adapting, and/or clarifying how existing policies and practices, programmes and management systems already work to prevent modern slavery.
>
> Relevant policies may include:
> - Supplier code of conduct
> - Migrant worker policy
> - Child labour policy
> - Human rights policy
> - Recruitment policy
> - Procurement policy
> - Employee code of conduct
> - Policies concerning access to remedy, compensation and justice for victims of modern slavery
> - Policies that relate to staff training and increasing awareness of modern slavery
> - Policies that relate to worker wages, welfare and living standards

► Why are policies important?

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The establishment of policies and incentives shape the environment and set the tone of an existing organisation in assessing, preventing and mitigating the risk of modern slavery and working to influence and remedy modern slavery in their supply chains and organisation.

Clear organisational policies demonstrate an organisation's commitment to this issue and ensures that appropriate and co-ordinated action is taken throughout the business.

For guidance on how to develop effective modern slavery policies, see page 12 of CORE Coalition's Beyond Compliance Guide.

For example of policies that help tackle modern slavery, see ASOS' Supplier Ethical Code and HPE's Supply Chain Foreign Migrant Worker Standard

- ( ) Yes and they are publicly available

Please upload relevant policies
You may upload up to 5 files.

Choose File No file selected

Browse previous...

- ( ) Yes but some/all are not publicly available

Please upload relevant policies and provide information on why they are not publicly available
You may upload up to 5 files.

Choose File No file selected

Browse previous...

- ( ) No

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Policies, Procedures and Governance

You are **26%** through this questionnaire

12. Do your organisation's modern slavery policies or codes include any of the following provisions? Tick all that apply.

► Use of worker-paid recruitment fees

The charging of recruitment fees to workers is a common factor underpinning many aspects of modern slavery.

Job seekers become tangled in an unregulated web of recruitment agencies who charge fees to workers to place them in a role.

These fees can be exorbitant, requiring workers to borrow money, sell or mortgage land or property, or sign contracts which ensure the worker is kept in a role until enough is deducted from their salary to pay off the debt. As a worker moves through the recruitment life cycle, fees can accumulate and paying them off becomes untenable.

These fees are illegal in the UK and in many other countries.

For guidance on how your organisation can work to prevent these fees being charged and leading to debt bondage, please see IHRB's Guide to Implementing the Dhaka Principles.

- [ ] Adherence to local and national laws
- [ ] Freedom of workers to terminate employment
- [ ] Freedom of movement
- [ ] Freedom of association
- [ ] Prohibits any threat of violence, harassment and intimidation
- [ ] Prohibits the use of worker-paid recruitment fees

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- [ ] Prohibits compulsory overtime
- [ ] Prohibits child labour
- [ ] Prohibits discrimination
- [ ] Prohibits confiscation of workers original identification documents
- [ ] Provides access to remedy, compensation and justice for victims of modern slavery
- [ ] None of the above

13. Does your organisation meet any of the following good practice in relation to its modern slavery policies? Tick all that apply.

- [ ] Policies are approved by senior management
- [ ] Policies are available to workers in your organisation and communicated to them
- [ ] Policies are available to workers in your supply chain and communicated to them
- [ ] Relevant staff in your organisation are trained on these policies
- [ ] High risk suppliers are required to adhere to your modern slavery policies as a contract condition
- [ ] High risk suppliers are trained on the relevant policies
- [ ] None of the above

Assessing and Managing Risk

You are **29%** through this questionnaire

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This section examines how your organisation identifies risk in regard to modern slavery. Where relevant, questions will look to understand the following:

- How modern slavery risks are assessed and managed
- Reporting mechanisms used to identify modern slavery risks
- Actions taken to mitigate these risks

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14. Have you assessed how your organisation's purchasing practices may create pressures on your suppliers that could lead to modern slavery?

► Purchasing practices

> Organisations can have a profound impact on worker conditions in their supply chains through their purchasing practices. Certain purchasing practices can unintentionally put pressure on suppliers leading to poor recruitment practices, worker conditions and low pay for some workers.
>
> Organisations should assess their purchasing practices and consider any changes they could make to avoid placing unreasonable expectations on suppliers.
>
> Some examples of purchasing practices that could create these conditions include:
> - Aggressive pricing that doesn\'t consider sustainable production costs
> - Short lead times and late high volume orders
> - Inaccurate forecasting
> - Late or extended payments
> - Withdrawing from contracts last minute
> - Unfair penalties for not meeting orders despite last minute changes
> - Accuracy of technical specifications.
>
> For further guidance, please see the Ethical Trading Initiative\'s Guide to Buying Responsibly.

◯ Yes

◯ No

Assessing and Managing Risk

You are **32%** through this questionnaire

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14a. What aspects have you assessed? Tick all that apply.

- [ ] 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
- [ ] Inaccurate technical specifications
- [ ] Other

Please provide details

Please provide any further information on any changes you have made because of your assessment (optional)

Assessing and Managing Risk

You are **35%** through this questionnaire

Guidance

(ref:16) Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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15. At which of the following stages during the procurement process does your organisation consider modern slavery risks? Tick all that apply.

► Considering modern slavery

> It is important to consider modern slavery issues at different stages of the procurement process to help reduce risks to your business. For example, during the tender stage, businesses should factor labour costs in to their procurement and consider whether the price they are paying for goods and services are so low that the supplier (or their suppliers) are likely to be exploiting workers.
>
> For further guidance on factoring modern slavery issues in the procurement process, please see the Ethical Procurement for Health Workbook.

- [ ] Needs identification
- [ ] Requirement definition
- [ ] Tender evaluation (including scoring and adjudication process)
- [ ] Contract award
- [ ] In-life contract management
- [ ] End of contract review

Please provide any further details on the answer options that you have selected (optional)

- [ ] None of the above

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16. Do you supply goods (to the buyer/s that invited you to complete this assessment) that have been identified by the US Department of Labor to be at higher risk of being produced by child labour or forced labour?

► Goods at high risk of child labour or forced labour

> The United States Department of Labor produces a list of goods that are at higher risk of being produced by child labour or forced labour.
>
> The list of goods can be found here.

- ○ Yes

Please provide details of the goods (that you are aware of) which you supply to the buyer/s that are on this list. You should provide details of the commodity, where it comes from and which products they feature in that you supply to the buyer/s

- ○ No
- ○ Do not know
- ○ Not applicable

Please provide details of the goods (that you are aware of) which you supply to the buyer/s that are on this list. You should provide details of the commodity, where it comes from and which products they feature in that you supply to the buyer/s

Assessing and Managing Risk

You are **38%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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17. Where have you identified there to be the highest risk of modern slavery in your organisation and your supply chains?

- [ ] Categories
  High risk categories include goods for resale, goods not for resale, services for sale & services used for operational purposes

- [ ] Vulnerable groups
  High risk vulnerable groups can include migrants, women, refugees and children

- [ ] Types of work
  High risk types of work include temporary work, seasonal work, low/unskilled work or hazardous work

- [ ] Sectors
  High risk sectors can include domestic work, construction, manufacturing, agriculture, forestries, fishing, accommodation and food services, wholesale and trade, personal services and mining and quarrying

- [ ] Other

Please provide details of any other high risk modern slavery areas

- [ ] Have not identified

Assessing and Managing Risk

You are **41%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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17a. Has your organisation identified any categories that are considered as high risk? Tick all that apply.

- [ ] Goods for resale
- [ ] Goods not for resale
- [ ] Services for sale
- [ ] Services used for operational purposes
- [ ] No areas of risk have been identified
- [ ] Do not know

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17b. Has your organisation identified any worker groups that are considered highly vulnerable? Tick all that apply.

► Vulnerable groups and higher risk types of work

> It is important for organisations to ensure there are safeguards to prevent highly vulnerable groups of workers from being exploited.
>
> Migrants, women, refugees and children can be disproportionately at risk of forced labour, however it is important to recognise that the different make-up of the risk groups may vary by sector and supply chains.
>
> Organisations should consider how workers in their supply chain may be more vulnerable to exploitation due to their immigration status; gender; ethnicity; age and low education levels.
>
> Workers with limited labour protections, such as the inability to engage in collective bargaining can also be at higher risk.

- [ ] Migrants
- [ ] Women
- [ ] Refugees
- [ ] Children
- [ ] Other

Please provide details

- [ ] None of the above
- [ ] Do not know

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17c. Has your organisation identified any types of work that have a higher association with modern slavery? Tick all that apply.

► Types of work

> Certain types of work may be at higher risk, particularly those that are hazardous, low-skilled, manual and/or low paid.
>
> Workers on temporary and seasonal contracts are also associated with being at higher risk of exploitation due the additional risk of exploitation through labour intermediaries.

- [ ] Temporary work
- [ ] Seasonal work
- [ ] Low skill or unskilled work
  Low skilled or unskilled labour refers to a workforce with a limited skill set that requires lower educational attainment. Such work is generally menial and repetitive in nature whereby the job can be fully learned in 30 days or less.
- [ ] Hazardous work
  Hazardous working conditions include the following: Working underground/ underwater/ dangerous heights/ confined spaces, utilising dangerous equipment/manual handling/transportation of heavy loads, utilising hazardous substances, agents or processes, working in extreme temperatures/ noise levels or vibrations damaging to health.
- [ ] Other

Please provide details

- [ ] None of the above
- [ ] Do not know

17d. Has your organisation identified any high risk sectors that it works with? Tick all that apply.

► Sectors

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Although modern slavery can arise in any industry, the ILO has found the following sectors to be at highest risk of forced labour:

- Domestic work (24%)
- Construction (18%)
- Manufacturing (15%)
- Agriculture, forestries, and fishing (11%)
- Accommodation and food service activities (10%)
- Wholesale and trade (9%)
- Personal services (7%)
- Mining and quarrying (4%)

For more information on the global prevalence of modern slavery, see [the ILO\'s Global Estimates of Modern Slavery](#).

- [ ] Domestic work
- [ ] Construction
- [ ] Manufacturing
- [ ] Agriculture, forestries and fishing
- [ ] Accommodation and food service activities
- [ ] Wholesale and trade
- [ ] Personal services
- [ ] Mining and quarrying
- [ ] Other

Please provide details

- [ ] None of the above
- [ ] Do not know

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Assessing and Managing Risk

You are **44%** through this questionnaire

This section examines your organisation's oversight of its supply chain. Where relevant, questions will look to understand the following:

- Actions taken to engage with suppliers in regard to modern slavery
- Your organisation's auditing and other supply chain monitoring processes

18. Within the last 12 months, have you identified any of your organisation's suppliers as being at high risk of modern slavery as a result of your organisation's risk assessment?

- ◯ Yes

Please provide details you can share on the suppliers that are at risk of modern slavery and how you have identified them as being at high risk

- ◯ No - we have investigated our supplier risk and found none to be at higher risk
- ◯ No - we have not investigated our suppliers' modern slavery risks

Assessing and Managing Risk

You are **47%** through this questionnaire

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18a. Did you terminate your contract with these suppliers once you identified them as higher risk?

- ◯ Yes
- ◯ No - we are working with these suppliers to address risks

Please provide further details on your answer option response

Due Diligence

You are **50%** through this questionnaire

Guidance

(ref:19) Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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19. Does your organisation undertake any activity to support workers in your supply chains have access to trades unions or other forms of worker representation?

► Trade Union

> Depending on local laws, workers may be able to join or form a trade union of their own choosing and to bargain collectively for amendments to their working conditions. For guidance on how your organisation can help promote freedom of association in your supply chain, see the ETI's Freedom of Association in Company Supply Chains: A Practical Guide.

○ Yes

Please provide further detail

○ No

Please provide further detail

○ Do not know

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20. Does your organisation actively work with non-governmental organisations (NGOs) or other businesses to support its efforts to prevent and mitigate modern slavery?

- [ ] Yes - NGOs
- [ ] Yes - Businesses

Please provide further information on how you collaborate with partners to prevent and mitigate modern slavery

- [ ] No

Due Diligence

You are **53%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

21. Has your organisation undertaken any due diligence to ensure that workers in your supply chains are not trapped in debt bondage as a result of how they were recruited?

- ► Link between recruitment methods and debt bondage
- ► Risks of debt bondage

Guidance

This may be due diligence your organisation has undertaken directly or require your relevant suppliers to undertake.

Relevant suppliers are defined as those involved in the supply of goods or services to the buyer/s that invited you to complete the assessment.

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Direct recruitment refers to an internal method of recruitment whereby the organisation maintains an individual with responsibility for staff recruitment (This is often a HR or administrative role). Recruitment agencies and labour providers are both indirect forms of recruitment, whereby the organisation pays a third party to find workers.

Such indirect methods of recruitment can provide an avenue for modern slavery, as due to the absence of oversight and governance by the recipient organisation, the recruiter can employ various methods of exploitation, such as implementing worker-paid recruitment fees, as a form of debt bondage over the workers.

For further information on how companies can conduct due diligence to ensure responsible recruitment, see Verite's Fair Hiring Toolkit for Suppliers and IHRB's Guide to Implementing the Dhaka Principles

The International Labour Organization estimates 50% of all victims of forced labour in the private economy are in debt bondage.

It is important to note that workers can also become trapped in debt bondage for other reasons. Workers can be trapped in debt by employers for the provision of services provided by the employer, such as accommodation or healthcare.

Workers can also fall into debt bondage because of private debts incurred as a result of low pay and lack of healthcare provisions from the employer.

- [ ] Integrated safeguards in to company policies
- [ ] Raised awareness and built capacity of staff to understand risks of debt bondage
- [ ] Screen and evaluate key recruitment agencies/labour providers

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- [ ] Monitor key recruitment agencies/labour provider for ethical recruitment and hiring
- [ ] Undertaken corrective action plan
- [ ] Developed action plan to make system improvements
- [ ] Participated in multi-stakeholder initiatives to make a wider impact
- [ ] Other action

Please provide details

- [ ] None of the above

Due Diligence

You are **56%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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22. Does your organisation take any measures to ensure workers in your organisation have access to a grievance mechanism to report incidents or suspected incidences of modern slavery?

► Anonymous reporting

> If workers do not know their rights under local laws and under their contracts, they are less likely to report violations. For posters, leaflets and videos you can provide to workers, see the Gangmasters & Labour Abuse Authority's Resource page
>
> Anonymous reporting mechanisms for employees to raise suspected modern slavery incidents can provide an effective way of identifying risks within your business. For guidance on developing an effective grievance mechanism, see Shift's Guidance on Remediation, Grievance Mechanisms and the Corporate Responsibility to Respect Human Rights.

- ○ Yes
- ○ No
- ○ Do not know

Due Diligence

You are **59%** through this questionnaire

Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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22a. In which supply chain tiers does your organisation ensure that workers know their rights of employment?

- [ ] Tier 1
- [ ] Tier 2
- [ ] Tier 3
- [ ] Tier 4
- [ ] Not applicable

22b. In which supply chain tiers does your organisation ensure that all workers have access to an anonymous grievance mechanism to report incidents or suspected incidences of modern slavery without any form of penalty?

- [ ] Tier 1
- [ ] Tier 2
- [ ] Tier 3
- [ ] Tier 4
- [ ] Not applicable

22c. In which supply chain tiers does your organisation ensure that measures are in place to ensure migrant workers can report grievances and receive feedback in a language they understand?

- [ ] Tier 1
- [ ] Tier 2
- [ ] Tier 3
- [ ] Tier 4
- [ ] Not applicable

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22d. In which supply chain tiers does your organisation ensure that multiple communication channels are available to workers to report their concerns e.g. to a trade union representative?

- [ ] Tier 1
- [ ] Tier 2
- [ ] Tier 3
- [ ] Tier 4
- [ ] Not applicable

22e. In which supply chain tiers does your organisation ensure that the effectiveness of this mechanism has been assessed with senior leadership engagement?

- [ ] Tier 1
- [ ] Tier 2
- [ ] Tier 3
- [ ] Tier 4
- [ ] Not applicable

Due Diligence

You are **62%** through this questionnaire

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23. Do you have a Service Level Agreement (SLA) or any other process in place for responding to a report of suspected instances of modern slavery?

► Service Level Agreement

> It is important to have a prompt and victim centred response to reports of modern slavery, so that victims are safeguarded and are supported in receiving justice and compensation.
>
> Where an organisation's suppliers have alerted their customers of modern slavery, is cooperating with authorities, actively implementing corrective actions and is not found to be complicit, organisations should have no standard policy to immediately delist or suspend trade with that supplier because of that specific incident.
>
> A Service Level Agreement (SLA) is a formally recognised agreement to react within a specific time frame and with a specific response. An SLA may be made explicit in an organisation's modern slavery policy.
>
> For guidance on how your organisation and your suppliers can ensure they are well prepared, see CIPS Making a Plan for Remediation or Shift's guidance on remediation.

- ○ Yes
- ○ No

Due Diligence

You are **65%** through this questionnaire

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23a. Does your organisation automatically de-list or terminate trade with a supplier even if they are found to not be complicit?

◯ Yes ◯ No

23b. Are your suppliers expected to follow a similar process?

◯ Yes ◯ No

23c. Are suppliers required to provide an action plan highlighting gaps in their process, root causes of incident and corrective action they are undertaking?

◯ Yes ◯ No

Due Diligence

You are **68%** through this questionnaire

24. Has your organisation undergone a social audit (or another form of audit which assesses labour conditions) within the last 12 months? Tick all that apply.

► Social Audit

Social audits enable an organisation to assess and demonstrate compliance with social, economic, and environmental legislation. It is a way of measuring the extent to which an organisation lives up to the shared values and objectives it has committed itself to. Social audits can give an insight to working conditions and identify issues, but should be considered as one element of an organisations due diligence processes.

Social audits can be conducted internally or by an external body, however if an internal audit is conducted, it must be carried out by competent persons who are in a position to be impartial, objective and free from direct responsibility for the activity being audited. For this reason they are often members of a different department or location.

Guidance

(ref:25) Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

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Yes, an internal social audit

Please upload
There is no limit to the number of files you can upload.

Choose File No file selected

Browse previous...

Yes, an external social audit

Please upload
There is no limit to the number of files you can upload.

Choose File No file selected

Browse previous...

No audits carried out

Please provide any further information

25. Does your organisation conduct any types of audits on its suppliers and their business activities or have any other process to investigate working conditions in your supply chain?

Audits can be specific to modern slavery or may form part of a wider sustainability or labour standards programme

Yes

Please provide further detail

No

Due Diligence

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Where you have selected to answer this Assessment in relation to a contract (Q2), remember to answer in relation to the specific goods/services provided for that contract.

25a. Has your organisation identified labour rights issues in your supply chain as a result of these audits?

- ◯ Yes

Please provide further information on which labour rights issues were found and a summary of the action undertaken to address these issues (optional)

- ◯ No

25b. How does your organisation conduct these audits?

- ☐ By organisation's own staff
- ☐ By a third party
- ☐ Announced audits
- ☐ Unannounced audits
- ☐ Other

Please provide details (optional)

25c. How often do you audit these suppliers?

- ☐ Pre-contract
- ☐ Annually
- ☐ Every two years
- ☐ Every three years or more

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Due Diligence

You are **74%** through this questionnaire

26. Is there any further information you want to provide on the due diligence your organisation undertakes to manage modern slavery risks?

Please provide details

Training

You are **76%** through this questionnaire

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27. Does your organisation provide training to workers on modern slavery?

► Training on modern slavery

> Organisations should consider where training should be targeted to have the most effect. If those workers who might encounter modern slavery directly are aware of the indicators of modern slavery and how to report suspected cases, they can effectively help to root it out in a particular business or supply chain.
>
> Stronger Together and the GLAA offer a range of free resources that can help organisations train their staff and suppliers.

- ○ Yes
- ○ No

Training

You are **79%** through this questionnaire

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27a. Does the training cover the ILO's Forced Labour Indicators?

► Indicators of forced labour

The ILO has identified the following 11 indicators that highlight the circumstances where forced labour may be found:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

Your organisation\'s training should cover the ILO\'s 11 Indicators of Forced Labour. The Ethical Trade Initiative provides useful information on how these indicators can manifest on page 8 of the Base Code Guidance.

◯ Yes ◯ No

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27b. What outcomes are expected? Tick all that apply across the different training your organisation provides.

- [ ] Recipients understand indicators of modern slavery
- [ ] Recipients understand how to report suspicions of modern slavery
- [ ] Recipients understand the Modern Slavery Statement requirements
- [ ] Recipients understand how to consider modern slavery risks in procurement
- [ ] Recipients become better equipped to undertake modern slavery due diligence for your organisation
- [ ] Other

Please provide details

27c. What format is the training? Tick all that apply.

- [ ] E-Learning
- [ ] Workshops
- [ ] Webinars
- [ ] Courses
- [ ] Other

Please provide details

Training

You are **82%** through this questionnaire

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27d. Is this training mandatory for those who receive it?

◯ Yes ◯ No

27e. How frequently is training on modern slavery provided? Tick all that apply.

- ☐ At induction
- ☐ When a violation occurs
- ☐ When a policy is updated
- ☐ Every 6 months
- ☐ Every 12 months
- ☐ Other

Please provide details

27f. Who developed the training on modern slavery?

- ☐ In-house staff
- ☐ Third party
- ☐ Other

Please provide details

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27g. Who delivers training on modern slavery?

- [ ] In-house staff
- [ ] Third party
- [ ] Other

Please provide details

27h. Is any of the training above provided to suppliers by your organisation?

- ◯ Yes
- ◯ No

Please provide further details on the type of training. (optional)

KPIs

You are **85%** through this questionnaire

28. Does your organisation have any key performance indicators (KPIs) relating to how your organisation mitigates modern slavery in your organisation and supply chains?

► KPIs

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It is important for organisations to measure the performance of any anti-slavery actions it has undertaken to enable it to make improvements.

If an initial risk assessment highlighted issues in a company\'s operations or supply chain, a KPI could be introduced to measure progress against reducing that risk, for example improving conditions for those people.

A business could set targets for:

- Training and capacity building of staff about modern slavery issues
- Measuring changes in awareness of risk
- Appropriate decision making and swift action as appropriate
- Grievance procedures and whistle-blowing procedures for workers if cases or suspected cases are found
- Visibility, leverage and oversight of suppliers in relevant goods and services supply chains

It is also good practice for KPIs to be reviewed regularly by senior management to ensure the KPIs are practical and achievable.

For further guidance on developing KPIs, see page 30 in the Government\'s practical guidance.

- ○ Yes
- ○ No

KPIs

You are **88%** through this questionnaire

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28a. In which areas does your organisation set KPI's?

- [ ] Policies

Provide details on the KPI's that are set within your organisation

- [ ] Risk assessments

Provide details on the KPI's that are set within your organisation

- [ ] Due diligence

Provide details on the KPI's that are set within your organisation

- [ ] Training

Provide details on the KPI's that are set within your organisation

- [ ] Other

Provide details on the KPI's that are set within your organisation

28b. Are these KPIs reviewed by senior management on an annual basis?

- ◯ Yes
- ◯ No

KPIs

You are **91%** through this questionnaire

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29. Please provide a summary of your organisation's objectives and plans to improve how you manage modern slavery risks in the next 12 months.

Please provide details

Sign off

You are **94%** through this questionnaire

30. If there is any additional information regarding your organisations commitment to tackling modern slavery that you would like to share?

Please provide details

31. Please provide any feedback on this assessment.

Please provide details

Sign off

You are **97%** through this questionnaire

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Thank you for completing the Modern Slavery Assessment.

You are about to send the information provided in this questionnaire.

By sending this information you confirm that you are an authorised representative of the organisation for which you have responded. In addition, this confirms that the information you have provided for the questionnaire represents a true and honest account of your organisation's performance and that no information has been omitted which should reasonably have been shared.

To review your answers and make any final amendments prior to sending, please click "**Save and view answers**" below.

To send your Modern Slavery Assessment, please click "**Send Response**" below.

What Happens Next?

Once you have clicked "Send Response" :

- Your answers will be analysed against good practice and areas of improvement may be recommended to your organisation, for consideration and action. You will be able to acknowledge any recommended improvements and can demonstrate the action you have taken to implement these improvements.
- You will be asked who you would like to share your Modern Slavery Assessment results with. You can search and select the Buyers that you would like to share your data with. You will be able to amend the sharing permissions at any time if you want to remove a Buyer or add a new one.

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