



Modern Slavery

Practical Steps for Procurement

Modern Slavery Guide for Procurement



VinciWorks

Twelve questions to ask suppliers

Use these questions as a starting point to assess all parts of the supply chain and investigate any potential areas of concern.

If the answer to any of these questions from a supplier is no, then further investigation is required.

1

Does your company have a policy/standards on modern slavery, forced labour, human trafficking and/or other forms of labour exploitation?

2

Does your company have grievance procedures in place to allow workers to bring concerns or work-related issues to the attention of management in an anonymous manner?

3

Do you conduct independent audits of your operations and suppliers based on company standards that include clauses on modern slavery, forced labour, human trafficking and/or other forms of labour exploitation?

4

Do all of your staff have legal working contracts with specified wages, working hours, conditions and holidays?

5

Can your company ensure that personnel recruitment sources, including local and overseas labour brokers or recruitment agents, operate ethically and are not complicit in labour abuses?

6

Can you ensure that none of your workers are under bond, debt or other obligation to your company, personnel recruitment sources or any other party in relation to their employment?

7

Does your company ban children under 15 years of age from working?

8

Are your workers free to join or form a trade union and participate in collective bargaining?

9

Does your company have a formal policy in place to prevent harassment, discrimination and abuse?

10

Do you have procedures in place to identify and manage risks relating to modern slavery, forced labour and human trafficking, including from personnel recruitment sources?

11

Can you ensure that all suppliers, including personnel recruitment sources, comply with policies relating to modern slavery, forced labour and human trafficking?

12

Can you ensure that all suppliers, including personnel recruitment sources, comply with policies relating to modern slavery, forced labour and human trafficking?

Ten steps procurement teams should take

A single supply chain can consist of hundreds of subcontractors, labour agencies, and material suppliers with complex relationships and different standards. Follow these ten steps to help identify and eradicate modern slavery from your supply chain.

Ensure that procurement procedures and the supply chain are as efficient as possible.

Understanding and assessing which high risk countries, products, and raw materials are part of the supply chain is the first step conducting a risk assessment.

Understand the different industries involved in the supply chain and map out the potential risks of modern slavery and labour exploitation for each.

Ensure staff and suppliers receive training to understand the warning signs that would warrant further investigation or reporting up the supply chain.

Thoroughly question suppliers as a starting point to assess all parts of the supply chain and investigate any potential areas of concern.

Find examples from your own industry of companies who have successfully identified and dealt with modern slavery issues.

Check the recruitment fee policy for all contractors and agencies in a supply chain.

Develop a thorough check-list and set of responsibilities for all site visits, including follow up and repeat visits.

Ensure all your suppliers are trained and compliant on human rights and labour rights. There are no national or cultural exemptions to human rights.

Ensure all international suppliers and contractors adhere to the Dhaka Principles and procurement teams are aware of legal requirements and standards.

Human rights and modern slavery

Effective corporate human rights due diligence is not only a legal requirement, but is also good for business.



Employment is
freely chosen



Freedom of association
and the right to
collective bargaining is
respected



Working conditions
are safe hygienic



Child labour
shall not be used



Living wages
are paid



Working hours are
not excessive



No discrimination
is practised



Regular employment
is provided



No harsh or inhumane
treatment is allowed

Modern slavery: sector specific risks

Understanding the major risk factors for a sector can help identify where further investigation may be warranted.



Construction, care, cleaning, hospitality

- Use of migrant workers
- Predominance of female workers and male supervisors in cleaning, care, and hospitality
- Precarious contracts, if they exist at all - zero hours or insecure terms
- Limited legal protection for migrant workers in that country
- Debt bondage and unscrupulous recruitment practices by agents
- Use of child labour



Food and farming

- Weak inspection and monitoring systems
- Heavily isolated rural areas
- Use of labour contractors and recruiters, in particular unlicensed ones
- Migrant workers
- Hazardous work, e.g. conflict-prone regions or harsh circumstances like fishing trawlers
- Lack of obvious transport means for workers
- Smallholder farms
- Health and safety violations, such as use of hazardous chemicals, heavy loads, lack of safety equipment



Clothes and textiles

- Building, fire, and electrical safety issues
- Predominance of female workers and male supervisors
- Complex sourcing arrangements, e.g. from raw material to manufacture at multiple sites
- Reliance on homeworking
- Subcontracting to small, unregulated industries
- Third party agency employment contracts
- Child labour



General merchandise and other manufactured goods

- Sourced from fragile or high risk countries or regions
- Use of labour contractors and recruiters
- Child labour
- Use of bonded or prison labour
- Health and safety violations, e.g. lack of safety equipment, high worker accident rate

Modern Slavery: key learning points

Being aware of these learning points supports procurement professionals to better understand how modern slavery can hide in the supply chain, how to find it, and how to stop it.



Lack of transparency and complex supply chains can easily allow modern slavery to flourish



Migrant labourers are a high risk group to be victims of modern slavery



The particular risks of modern slavery and human trafficking depend on the industry



Unfair contracts and inflated loans can bond people into servitude



Many common consumer and business products are at high risk of modern slavery



Businesses can be liable for slavery in their supply chains



International supply chains can often include countries where modern slavery is a problem



Businesses can take action to reduce the risk of slavery in their supply chain and make a positive impact on the lives of exploited workers

Undertaking a site visit

Visiting physical locations of the supply chain first-hand is an excellent way to gain familiarity with a site's operations. Site visits should be undertaken for any new suppliers and should take place regularly for existing suppliers.

Before the visit

Do due diligence on the supplier. Have copies of all their policies and recruitment practices, and they have responded to your questions.

Try and undertake unannounced visits. Find out in advance about previous incidents and if and how they were resolved. Consider the risks in the local area, including the size of the migrant population, levels of poverty and local government.

During the visit

What are your impressions of who is taking you on the visit? Consider how they interact with the workers and the site. Interviewing workers at random, but be aware that the interpreter may not be fully independent.

Inspect the facilities available, including the bathroom and fire exits. Look at shift rotations, sick day policies and payroll. Be aware of the capacity of the site, if it meets expectations or if there is evidence of further subcontracting.



After the visit

Consider arranging a further unplanned visit within 24 hours and see if the conditions are the same. Follow up with the contact person at the site for any further information.

Share your findings with local NGOs or labour groups. Arrange further interviews with all levels of management and staff off-site. Check through original copies of signed contracts, operational procedures for labour recruiters and any pending or past complaints.



Spot the signs of modern slavery

Knowing which signs can indicate modern slavery abuses can help prevent exploitation and save lives. Following instincts, being aware of red flags and properly investigating concerning reports can go a long way to preventing labour abuses.



Signs of restricted freedom

- Not in full control of their own passport or identity documents, have fake documents or documents are held by someone else for 'safekeeping'
- No access to medical care or no time off for sickness
- Unable to leave the work environment or forced to live on the premises
- Completely dependent on the employer for work, transport and accommodation
- Limited contact with anyone outside of the workplace
- Subject to violence, threats and intimidation; either against the victims or their families



Poor working conditions

- Unable to negotiate or discuss working conditions
- Has no say in choosing when to work or forced to work hours they did not agree to
- Works excessively long hours, back-to-back shifts and no days off
- Not adequately dressed or does not have protective equipment, safety gear or warm clothing
- Lacks basic training or knowledge of the work
- Has no formal contract or the contract is held by someone else



Financial control

- Bonded by debt or under the impression that they are
- Working off debt for travel, accommodation, food or training
- Charged for services they don't want or need
- Receive little or no real take-home pay
- Have little or no access to the money they earn