

OPERATION FORT

What businesses should learn from the UK's largest anti-slavery prosecution

June 2020

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With thanks to all those who provided evidence and information to support this review, which is dedicated to the estimated 400 victims and survivors of Operation Fort.

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FOREWORD

Dame Sara Thornton – Independent Anti-Slavery Commissioner

Investigations and prosecutions for modern slavery are complex, lengthy and require significant expertise. In 2019 an outstanding team of dedicated police officers, community workers and prosecutors brought to justice a gang of transnational organised criminals. Criminals who had exploited up to 400 Polish men and women and subjected them to the most inhumane treatment in the West Midlands over several years. This review explains how these criminals operated and I hope that it will be a valuable case study for law enforcement.

However, this review is not just about a police investigation. The businesses in which the men and women were exploited supply goods to all the main food retailers and home improvement stores. As Independent Anti-Slavery Commissioner I have a statutory responsibility to identify good practice and therefore wanted to understand what measures businesses were taking to ensure that they were addressing the risks of slavery and trafficking in their organisations or their supply chains. In short, what were they doing to prevent slavery and trafficking? The second part of this review sets out our findings.

In Operation Fort some of the trafficking occurred in the agri-food sector which is probably the most regulated of industries – and still abuse was taking place. It is a powerful reminder of the need to be ever vigilant to the activities of those who seek to exploit the labour of their fellow human beings. Slavery and trafficking are not confined to global supply chains. They are occurring in plain sight in the United Kingdom.

As we met retailers and suppliers, we began to develop a clearer understanding of the good practice in businesses and to appreciate that some were clearly more mature in their approach. We wanted to create an assessment tool that helped business gauge improvement rather than just comply with the legal requirement to have a modern slavery statement. The **maturity framework** on page 29 sets out the activities of businesses – from those that are barely compliant to those that are leading in human rights innovation and ethical performance. While this research and analysis was completed before the Covid-19 pandemic I believe that the framework proposed is highly relevant to building a Covid-19 resilient economy. This framework will prove useful for businesses and their investors.

Modern slavery and human trafficking are egregious criminal offences and it is important that the perpetrators are brought to justice and that victims are supported. Cases such as Operation Fort send a strong message of the state's resolve to pursue wrongdoing, however complex the investigation and prosecution. This deters offenders. However, investigations and prosecutions also provide valuable opportunities to understand how the criminals operate and, therefore, what businesses can do to build their resilience, protect their workers from exploitation and prevent it from happening again.

The review ends with my **Agenda for Action in 2020** which sets four challenging objectives for companies. They emphasise action not words and would enable business to play its part in eradicating forced labour, modern slavery and human trafficking by 2030 in line with the United Nations Sustainable Development Goal (SDG) 8.7.¹

¹ UN Sustainable Development Goal 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms: <https://www.un.org/sustainabledevelopment/economic-growth/>.

GLOSSARY

BRC	British Retail Consortium
BSCI	Business Social Compliance Initiative
DWP	Department for Work and Pensions
ETI	Ethical Trading Initiative
GLAA	Gangmasters and Labour Abuse Authority
IASC	Independent Anti-Slavery Commissioner
ILO	International Labour Organization
NGO	Non-governmental organisation
OCG	Organised crime group
RRT	Responsible Recruitment Toolkit
SAWS	Seasonal Agricultural Workers scheme
SDG	Sustainable Development Goal
STPO	Slavery and Trafficking Prevention Order
STRO	Slavery and Trafficking Risk Order
UNGPs	UN Guiding Principles on Business and Human Rights

1. INTRODUCTION

On 5 July 2019, eight members of a Polish criminal gang were convicted of slavery, trafficking and money laundering offences. They were part of the largest modern slavery network ever to be uncovered in the UK.

Although Operation Fort, the ongoing investigation run by West Midlands Police, identified 92 potential victims, police estimate that as many as 400 Polish nationals could have been exploited. Their ages ranged from 17 to a man in his sixties. Most had little or no English language skills.

Operation Fort is similar to many other modern slavery cases in encompassing many different types of crime, including modern slavery, human trafficking, fraud, deception, theft and physical abuse. All parties, including law enforcement, non-governmental organisations (NGOs), banks, retailers, suppliers and labour providers can learn from this difficult experience. The focus of this review is the questions that it raises for business.

The traffickers targeted vulnerable victims in Poland, luring them to the UK with the promise of well-paid jobs and accommodation in the Birmingham area. On arrival, they were forced to live in squalor and work long hours in farms, factories, waste recycling plants and parcel sorting warehouses. In addition, some victims were forced to work extra hours carrying out building and maintenance work on a number of properties owned by the criminal network.

The perpetrators lived a life of luxury, buying designer clothes and high-end cars. It is estimated that they made more than £2m between 2012 and 2017. But they paid victims as little as £20 a week, forcing them to live in cramped, vermin-infested accommodation. Some properties had no working toilets, heating, furniture or hot water and victims were forced to wash in canal water.

Victims were fed out of date food and forced to scavenge for bedding and mattresses to sleep on. One was denied medical treatment and painkillers after an accident at work. Starving, beaten and fearful of threats to their families, many were relying on food banks and soup kitchens to survive. All the victims are now living with the long term physical and psychological scars of their ordeal.

When it came to trial, lead prosecution barrister, Caroline Haughey QC, described Operation Fort as the largest human trafficking investigation ever to be undertaken in Europe. Judge Mary Stacey said that the crimes had been carried out at an “almost industrial scale”.

West Midlands Police took nearly five years to build the first case, gathering evidence from 89 victims.² But Operation Fort remains a live operation and investigations continue.

“This was the most ambitious, extensive and prolific network of interlinked overarching conspiracies to traffic large numbers of vulnerable men (and a few women) into the UK for the purposes of two forms of exploitation: both labour exploitation and using them to open multiple bank accounts, ostensibly in their name but over which they had no control.”

Sentencing remarks by Judge Mary Stacey, 8 March 2019

² Police identified 92 victims in total, relying on evidence from 66 victims during the trial.

1.1 Why Operation Fort is important

Operation Fort is important not only because of the number of victims, but also the length of time the criminal gang was able to operate without disruption. The gang's activities can be traced back to at least 2012 and continued long after the passing of the Modern Slavery Act in 2015.

The supply of temporary labour to the UK's agriculture and food processing sectors is more tightly regulated than other parts of the economy, requiring temporary labour providers to be licensed by the Gangmasters and Labour Abuse Authority (GLAA).³

Nevertheless, the criminals were able to routinely supply exploited labour to retailer supply chains with little risk of detection.

It is also significant that the crime occurred within the first tier of retail supply chains. Consumer-facing organisations tend to be more advanced than other sectors in conducting due diligence and understanding supplier risk.

Operation Fort sends a clear warning that no supply chain is safe from worker exploitation. Modern slavery and human trafficking gangs are highly adaptable; organisations must continually evolve to keep pace with entrepreneurial criminality.

1.2 Response from the Independent Anti-Slavery Commissioner

In the summer of 2019, the Independent Anti-Slavery Commissioner, Dame Sara Thornton, wrote to the CEOs of 15 retailers expressing her concerns about Operation Fort and asking what measures the companies were taking to ensure that suppliers were not using slave labour.⁴

“This case illustrates the enormous harm that victims of exploitation suffer. Your business has a role to play in identifying and preventing exploitation.”

Letter from Dame Sara Thornton to companies, 16 July 2019

The letters were sent to ten food retailers and five retailers of building-related products, all of whom replied.

Food retailers or distributors	Aldi Food Stores Ltd, Asda Stores Ltd, Co-operative Group Ltd, Lidl GB Ltd, Marks and Spencer plc, Wm Morrisons plc, Ocado Group plc, J Sainsbury plc, Tesco PLC, Waitrose & Partners
DIY stores or building materials suppliers	B&Q plc, Homebase (UK&I) Holdings Limited, Screwfix Direct Ltd, Travis Perkins plc, Wickes Building Supplies Ltd

³ First established as the Gangmasters Licensing Authority by the Gangmasters Licensing Act 2004, then becoming the GLAA under the Immigration Act in 2016.

⁴ <https://www.antislaverycommissioner.co.uk/media/1366/iasec-letter-to-businesses-on-operation-fort-july-2019.pdf>.

To better understand the challenges of the sectors affected, the Commissioner has since held meetings with Waitrose, Co-op, Lidl, Marks and Spencer, Sainsbury's, Tesco, Homebase, Travis Perkins Group which also represents Wickes, and Kingfisher plc on behalf of B&Q and Screwfix.

Dame Sara and her team have also visited fresh produce supplier G's, met with the Forest Garden Group which manufactures wooden garden products, and interviewed ABP Food Group, The Fresca Group and labour provider The Staffline Group.

2. THE BACKGROUND TO OPERATION FORT

2.1 Perpetrators

The Polish organised crime group behind Operation Fort was a family network that encompassed parents, siblings, cousins and other Polish nationals. To date, eight members have been sentenced for forced labour and trafficking offences under Section 2 of the Modern Slavery Act.⁵ A further four people fled the UK in 2019 and are awaiting extradition to face trial.

2.1.1 Convictions

The eight people so far serving sentences for Operation Fort⁶ are:

- **Ignacy Brzezinski**, 54.⁷ He fled the UK and was sentenced to 11 years' imprisonment in his absence. Subsequently re-arrested in Poland, Ignacy stood trial again in Poland and was given a five-year sentence which he is serving in his home country
- **Justyna Parczewska**, 48, wife of Ignacy, sentenced to five years
- **Marek Brzezinski**, 50, Ignacy's nephew, received a jail term of nine years
- Family friend **Marek Chowaniec**, 30, received an 11-year sentence
- **Julianna Chodakiewicz**, 24, another family friend, was jailed for five and a half years
- **Natalia Zmuda**, 29, ex-girlfriend of Marek Brzezinski, received a four and a half year sentence
- **Wojciech Nowakowski**, 41, an associate of the family, was sentenced to six and a half years
- **Jan Pawel Sadowski**, 26, another nephew of Ignacy, was sentenced to three years' imprisonment

2.1.2 New civil orders

The Judge also imposed Slavery and Trafficking Prevention Orders (STPOs) on the convicted parties, which will last up to nine years after they are released from prison. STPOs are new civil orders introduced by the Modern Slavery Act. They restrict the activities of individuals that pose a continued risk of committing modern slavery and human trafficking offences.

2.1.3 Subsequent court order

In February 2020, property landlord Kashmir Singh Binning received a Slavery and Trafficking Risk Order (STRO),⁸ the first of its kind to be secured under the UK's modern slavery legislation.

The STRO, which runs until 2025, binds Binning to conditions such as not accepting cash payments from tenants, agreeing to property inspections by the local authority every quarter, and providing the council with details of all occupants. Binning faces jail if he does not comply.

⁵ <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>.

⁶ Sentences as adjusted following an appeal: <https://www.cps.gov.uk/west-midlands/news/secure-convictions-largest-ever-modern-slavery-prosecution>.

⁷ Ages given at time of trial.

⁸ <https://west-midlands.police.uk/news/landlord-who-turned-blind-eye-slavery-hit-landmark-court-order>.

2.2 Victims

Police took statements from 89 men and three women but believe that the gang may have targeted a further 300 individuals from different parts of Poland.

Most had vulnerabilities, such as being homeless, destitute or had formerly served prison sentences. Some were addicted to drugs or alcohol. Because of their backgrounds, many were already fearful or distrustful of the police. They spoke little or no English and did not understand their rights.

2.2.1 How victims were targeted

The organised crime group (OCG) used a network of recruiters in northeast Poland. They approached people outside off licences, homeless shelters, or as they were released from prison with offers of work. Each victim was told that they could earn between £250 to £400 a week, with accommodation and food provided. Agents used pressurising tactics, saying that free transport to the UK would only be available the same or following day. Some were given less than an hour to decide.

2.3 Accommodation

After arriving by coach, minibus, car or plane, victims were taken to an address in the West Midlands. The OCG used 32 rental properties, none of which was licensed as a property of multiple occupation.

Some houses had no heating, hot water, cooking facilities or furniture. Accommodation was squalid and overcrowded. Victims were forced to sleep many to a room and some had to find mattresses on the street. They were given small quantities of out of date food that had little nutritional value.

Subsequent police investigations established a connection between at least one of the landlords and traffickers. Kashmir Singh Binning rented out three damp and poorly maintained properties to the OCG. He allowed multiple occupancy even though the houses were registered to single tenants. One property was gutted by a fire in 2015 and was subsequently found to have no smoke detectors or fire doors. Two victims were taken to hospital.

Binning failed to cooperate with the council or police. He continued to rent to the traffickers, even after detectives warned him of the risk that his properties were being used to house victims.

“Binning’s role was pivotal to the group being able to house victims easily, quickly and at affordable cost. He was friends with some of the suspects and willing to turn a blind eye.”

Detective Sergeant Mike Wright, one of the investigators of Operation Fort⁹

⁹ <https://www.birminghammail.co.uk/news/midlands-news/benefits-street-slave-landlord-ignored-17847045>.

2.4 Control

In Operation Fort, as with many other modern slavery cases, victims were not locked up or imprisoned in the traditional sense. Instead they were worn down by a variety of psychological and physical tactics including coercion, threats, violence, forced fatigue, monopolisation and isolation. As a result, many victims were reluctant to talk to the authorities, even after they had been removed from the traffickers. Examples of control included:

2.4.1 Isolation

- Keeping new arrivals isolated for long periods of time
- Forbidding them to leave their accommodation without permission
- Maintaining a climate of fear and suspicion in each property – encouraging victims to spy on each other in reward for more food
- Moving victims between properties late at night to keep them disorientated – when talking to the police, many did not know their home address

2.4.2 Misinformation

- Duping victims into believing that their status in the UK was illegal, even though they were EU citizens with a right to remain
- Spreading myths about the UK justice system – many were already fearful of being reported to the authorities

2.4.3 Psychological and physical threats

- Removing and photographing Polish identity cards which contained home addresses. This made threats of violence against a victim's family credible
- Violent verbal and physical assaults including threats of sexual violence, and to maim or murder. Some victims were regularly beaten, others were told they would be sent back to Poland with limbs missing. This tactic was used as a means of controlling the wider group
- One woman who complained was told she would be put to work as a prostitute
- Two victims who complained about their treatment were taken out of their house and told to dig their own graves in the woods
- Another was stripped naked in front of other workers, doused in surgical chemical iodine, and told that the gang would remove his kidneys if he did not keep quiet

2.4.4 Forced fatigue

- Traffickers often forced victims to work consecutive shifts, or to spend their evenings carrying out maintenance of properties owned by the criminal network
- Victims were often driven long distances to work, escorted by the traffickers
- Those who complained were denied food and had their pay further reduced

2.5 Financial considerations: Banks and benefits

“Whilst harm in financial terms cannot be precisely quantified, the conspirators intended to carry on using their sophisticated network of recruiters, properties and employment opportunities for as long as they possibly could for the maximum possible financial benefit.”

Sentencing remarks by Judge Mary Stacey, 8 March 2019

Money laundering was closely intertwined with modern slavery in Operation Fort. In fact, financial information accounted for a third of all evidence submitted by prosecutors for the trial.

The traffickers used seven different banks to hide the proceeds of their crimes, employing a variety of tactics to ensure that victims could not access their money.

To maximise profits, the OCG took out loans, made false insurance claims and applied for benefits on behalf of the victims. The activity created a trail of patterns and indicators that, when better understood, could be used to detect and disrupt such money laundering operations. This was highlighted during the Operation Fort investigation. When police made enquiries at banks, local staff checked individual accounts and quickly identified signs of exploitation.

It is clear that financial institutions and government agencies in general, and frontline staff in particular, can play a powerful role in tackling modern slavery. Advanced data analytics on financial data could provide powerful insights, assisting police and agencies in tackling the threat, and also helping banks understand how traffickers are laundering money through victims' accounts. The need for education, protocols and reporting channels is pressing.

Here are some of the tactics used by traffickers:

2.5.1 Control of application processes

- Members of the organised crime group accompanied victims to banks to open one or more accounts
- OCG members accompanied victims to job centres, applying for National Insurance numbers on their behalf. Victims did not understand the significance of the numbers, nor the need to keep them private

2.5.2 Diverting money from victims

- The OCG used forged utility bills, bank statements and other fake forms of identification to provide alternative addresses to where the victims were living
- If a bank card was to be sent to the victim's actual address, the traffickers would board up the front door and letterbox, so that occupants could not access post from inside the house

2.5.3 Indicators of suspicious activity

- Members of the gang moved money quickly through bank accounts, regularly withdrawing large sums of cash shortly after payday. There was no indication of withdrawals for day to day living
- One person would often act as interpreter for many individuals, becoming a familiar figure to banking staff in the town
- There was a pattern of suspicious activity at the ATMs, with the same person repeatedly using different cards to withdraw cash from multiple accounts on the same day
- The OCG made fraudulent applications for benefits on behalf of the victims. More than 70 phone calls were made to the Department for Work and Pensions from the same phone number

2.6 Recruitment agencies

Analysis of Operation Fort suggests that the traffickers supplied victims to at least eight established labour agencies over several years, in many cases using normal recruitment channels.

While it is not possible to track the movements of all victims, it is certain that they were placed into many more supply chains than those identified by Operation Fort.

In fact, given the fluidity of labour supply to farms and factories, suppliers not involved with the police investigation have admitted that victims could have passed unnoticed through their operations via temporary labour, especially if they were being swapped in and out of the business for very short time periods.

2.6.1 Disguising suspicious activity

The traffickers used sophisticated methods to avoid creating suspicion at labour agencies. One agency had a system of checking whether multiple workers were being paid into the same bank account. However, as checks were only carried out on a weekly basis, the OCG was able to swap victims in and out of work in a random pattern, avoiding detection.

Other patterns of suspicious activity were not detected by agencies. For example, many victims gave the same phone number for next of kin information.

Sometimes the conspirators blended into daily operations. For example, Natalia Zmuda was a line manager at a recycling plant, working alongside victims. But trafficked workers were living at her property. She also controlled their bank accounts and took half their wages.

2.6.2 Agency infiltration

The traffickers were particularly strategic in the case of recruitment agency e-Response (now Workforce Staffing), using Polish national Julianna Chodakiewicz to infiltrate the business.

Julianna was responsible for managing the e-Response's labour contract for a large client and was embedded at the client's manufacturing site. Becoming involved with the OCG when she was just 19, she was described as a high performer by her bosses who were impressed by her ability to recruit up to 20 workers at a time.

In reality, Julianna was turning away genuine jobseekers to ensure that there were enough vacancies for the trafficked men. The number of victims entering the business was so high that she frequently used a colleague's identity to log them onto the system to avoid raising suspicion.

Because Julianna conducted interviews, she circumvented all the screening questions that agencies typically use for safeguarding workers. She dealt with employment forms, letting traffickers complete online registrations on behalf of victims. She also advised her co-conspirators on how to force victims to behave, to avoid detection in the workplace.

Motivated by profit and driving a hard bargain with the OCG, Julianna negotiated a £100 payment for each worker placed at e-Response, with an ongoing rate of £10, which went up to £20 per victim per week. She knew that the money was coming out of the men's wages and regularly altered victims' bank details so that money would be diverted to the gang.

Part of Julianna's official role included regularly touring the work premises to check up on workers. She also carried out inductions for newcomers and kept records of accidents. In time she was given extra responsibilities, such as running training sessions for the client. Julianna was sentenced to five and a half years in prison. Judge Stacey described her as "clever, smart, manipulative and charming" and criticised the "gullible bosses" at the labour agency for believing that her productivity was down to her social networking and marketing skills.

"Julianna worked in the same office block, and we saw her daily. She was popular, shy and softly spoken. Looking back, the amount of control she had seems sinister now, but nobody realised this at the time."

Comments by a member of the client's team, after the trial

2.7 How the crime was discovered

The crimes in Operation Fort only came to light after victims came looking for food at a soup kitchen run by a local church. They met a Polish charity outreach worker who referred them to anti-slavery NGO Hope for Justice.

It is of particular concern that employees in the locations where the victims were working neither noticed nor understood their distress. Or, if they did have suspicions, did not have the appropriate knowledge or protocols to act.

"This case has hit our Eastern European staff particularly hard because they had no idea what was happening in their own community. Looking back, they realised they could have missed some indicators of modern slavery. We have since trained our workforce to spot the signs."

Comments by a manager at one of the clients, after the investigation

2.8 Lessons identified from Operation Fort

Government agencies

- The GLAA, DWP, Her Majesty's Revenue & Customs and the Environment Agency could have added value to this investigation at an earlier stage. There is a strong imperative for closer cross-departmental cooperation in tackling complex crimes such as modern slavery

Banks

- Could have played a more proactive role in spotting the signs of slavery, both at branch level and through analysis of financial data

Local authorities, lettings agents

- Could have been more vigilant in spotting unorthodox use of properties, particularly houses of multiple occupancy
- Could have been more proactive in pursuing indicators of risk, such as lack of compliance to fire standards, failure to repair property and complaints of anti-social activity

Recruitment agencies

- Placed too much trust in individual employees
- Did not identify victims during interviews or inductions
- Carried out ineffective checks to detect anomalies, such as shared bank accounts and addresses
- Could have been more proactive in checking worker welfare, for example, through home visits

Employers and businesses

- Did not have enough safeguards in place for temporary workers
- Could have better educated their workforce on spotting the signs of slavery and exploitation
- Did not have clear protocols for reporting concerns around labour abuse
- Should have been more proactive in looking for cases of exploitation

3. ANALYSIS OF INDUSTRY PROGRESS SINCE THE MODERN SLAVERY ACT (2015)

Since taking office in May 2019, the Independent Anti-Slavery Commissioner has been meeting retailers and first tier suppliers to understand how the sector has been responding to Operation Fort. The Commissioner's team has also been analysing written responses and modern slavery statements of organisations across the sector.

Following the passing of the Modern Slavery Act in 2015, any business with a turnover of £36m or more is legally required to publish a statement on how it is tackling modern slavery risks across its operations and in its supply chains. For most organisations this has been new territory and businesses are at different stages of maturity. The most proactive are embedding human rights principles into day to day operations. But many are defaulting to compliance activities that are unlikely to protect the most vulnerable workers or corporate reputations.

3.1 Policies and governance

It is positive to see some companies aligning their business models to the UN Guiding Principles on Business and Human Rights (UNGPs)¹⁰ and explicitly making modern slavery a priority within their wider human rights strategy. But the UNGPs will not be effective unless they are embedded across supply chains, with suppliers working together in a shared endeavour.

Many retailers, including Tesco, Sainsbury's and Asda, have appointed modern slavery working groups that can monitor company performance and help to set direction. Proactive organisations are treating the ethical sourcing agenda as a significant business risk, with breaches of compliance regularly reviewed by risk committees.

Tesco recently conducted a full review of its human rights strategy, consulting with NGOs, suppliers, academics, unions and staff. Some businesses are bringing NGO expertise in-house with the creation of ethical posts at senior positions. One retailer acknowledged that it was "important to be challenged internally."¹¹

In the best examples, businesses are leading from the very top. At John Lewis Partnership, which owns the Waitrose brand, the executive team sets the strategic direction for ethics, sustainability and human rights. JLP chairman Dame Sharon White also chairs the partnership's ethics and sustainability committee which is made up of senior leaders from across the business.

But other organisations lag behind. They do not have, or have only recently introduced, specific human rights or anti-slavery policies.

3.2 Procurement and supply chain management

Retail supply chains are often long and complex and there is hardly any visibility beyond the first and second tiers. Many retailers have adopted the Ethical Trading Initiative's (ETI) Base Code for

¹⁰ https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf.

¹¹ Comments from IASC research interview.

ethical sourcing,¹² an internationally recognised code of labour practice, based on International Labour Organization (ILO)¹³ conventions.

An important step is embedding ethical requirements into commercial contracts and prequalification questionnaires. Many retailers are focusing on the supply chains of their own brand products, over which they have more control. There is less activity around non-branded items. However, Kingfisher Group has standardised its ethical terms for all suppliers.

In general, there is less clarity on how clients score suppliers on ethical performance against other factors, including price.

Retailers report that it is often more difficult to retrofit initiatives into existing contracts, but commercial reviews are enabling some to drive change. For example, Sainsbury's recently retendered the labour agency supply to depots. All labour suppliers are now contractually obliged to work towards the Clearview labour provider certification.¹⁴

3.3 Reporting for investors and NGOs

Retailers are reporting that investor interest in environmental, social and governance aspects has been growing, particularly over the past 18 months. This is encouraging some to be more transparent about their supply chains. Kingfisher Group, for example, took part in ShareAction's Workforce Disclosure Initiative last year.¹⁵

In an encouraging step, some companies are publishing their supply chains for high risk items:

- **Lidl** has published main suppliers' production facilities for textiles, footwear and priority food products
- **Sainsbury's** has published details for 99.6% of its first-tier manufacturing sites for clothing and footwear, including numbers of workers, locations and product type
- **Marks and Spencer** launched an interactive supply chain map in 2016, which discloses all first-tier factories, indicating the presence of a union or workers' committee in each location
- **The Co-op** has made a commitment to publish a list of all tier one production sites for own brand products and all supply chain tiers of three of its highest risk food categories

Many other retailers have yet to reach this point. With product lines running into tens of thousands, publishing lists of all supply chains remains a distant challenge for all.

3.4 Risk and intelligence gathering

International supply chains

As retailers grapple with the gargantuan task of mapping their product journeys, most activity is focused on the first and second tiers of supply chains. In this sector, many food products involve multiple suppliers and processes, so understanding is clearly in its infancy.

¹² <https://www.ethicaltrade.org/eti-base-code>.

¹³ www.ilo.org.

¹⁴ <https://www.clearviewassurance.com>.

¹⁵ <https://shareaction.org/wdi>.

For global trade, many organisations use ethical trade platforms, such as Sedex¹⁶ or amfori's Business Social Compliance Initiative (BSCI)¹⁷ to identify countries, sectors and locations of highest risk and to prioritise ethical audits. Companies are also using risk specialists such as Verisk Maplecroft, or sustainability ratings organisations such as EcoVadis to understand emerging threats and trends. Many organisations are also partnering with local NGOs to gain a better understanding of threats in specific regions.

Some retailers, including Tesco, are collecting intelligence through their responsible sourcing specialists, and some have introduced apps for their commercial teams prompting colleagues to spot and report ethical risks on site visits.

Asda has introduced a forced labour dashboard, based on supplier audits and self-assessment questionnaires, which it uses to identify strategic risks and "translate them into actionable quantifiable objectives."

In leading practice, some retailers are using data analytics to monitor their own operations and supply chains against a changing pattern of global risk. For example, Sainsbury's is using a modern slavery risk assessment tool, developed in partnership with PricewaterhouseCoopers and human rights consultancy Ergon. This integrates its commercial data with global economic trends on themes such as recruitment flows and indicators of worker vulnerability in multiple tiers of its supply chain.

Risks in the UK

It used to be assumed that the UK had little risk of modern slavery. Consideration of risk was overshadowed by other regions of the world, where labour standards are known to be lower.

Cases such as Operation Fort prove that there is no room for complacency – the agricultural sector's heavy reliance on migrant workers is now acknowledged to be a significant risk factor. Other areas of concern highlighted by retailers include warehousing and hand car washes, as well as the growing market for delivery apps for food services.

Several retailers and suppliers observed a greater need for intelligence sharing, at a regional as well as a national level. Quarterly briefings published by the Modern Slavery Helpline¹⁸ were cited as helpful. But some suppliers complained that their interaction with the GLAA had lessened in recent years and wanted to reconnect in a closer relationship. They also called for more routine licensing visits and checks.

Businesses commented that their relationship with law enforcement varied across the UK, depending on the engagement of individual police forces. Some indicated that they would welcome a standard information sharing protocol with the police.

The Commissioner has been informed of two new industry-led intelligence sharing initiatives in this sector:

- **Marks and Spencer** and **G's** are convening a pilot group to set up a shared intelligence platform, in collaboration with other retailers, suppliers, enforcement bodies and NGOs

¹⁶ <https://www.sedexglobal.com/>.

¹⁷ <https://www.amfori.org/content/amfori-bsci>.

¹⁸ www.modernslaveryhelpline.org.

- **Staffline Group** set up an intelligence sharing network for labour providers in late 2019. Nine recruitment agencies, and one client are currently involved

3.5 People

Britain has seen a sharp rise in the use of temporary labour; recent estimates suggest that there are around one million agency workers in the UK.¹⁹

It is generally accepted that temporary labour carries a higher risk of slavery. In recognition, some organisations have been increasing the proportion of directly employed workers within their operations. They have also been slimming down their lists of labour providers; building closer relationships with those working to higher standards.

But these steps only partially address the challenges of the agricultural sector where demand for labour can fluctuate dramatically, depending on the weather, harvest and consumer demand. Some agricultural suppliers report that they are inducting new temporary workers into the business every day during peak times. Others are forced to use unfamiliar agencies for short time periods. This creates a window of vulnerability during which exploited labour could be moved in and out of the operations.

Even without seasonal challenges, suppliers complain that they are grappling with an uncertain supply of workers. Several reported rapid worker churn, with no time to get to know individuals. This presents a further barrier for detecting modern slavery, because it can take time to build trust with vulnerable people.

There are reports that labour agencies of different sizes are operating with little scrutiny or safeguards. Some conduct bulk interviews, with many job applicants in a room at the same time. In other cases, recruitment is carried out over the phone without a face to face meeting.

As an important first step, clients are setting out expectations and guidance of their labour providers. In better practice, they are also investing in educating and training their supply chains. Some leading organisations are providing practical and financial support to help agencies strengthen their systems and build capacity.

The Responsible Recruitment Toolkit (RRT),²⁰ an interim product designed to pave the way towards Clearview certification,²¹ is currently being piloted by some organisations. The RRT currently has more than 1,000 subscribers, the majority of which work in the retail or food production sector.

In examples of good practice:

- **Travis Perkins** is asking suppliers of manual labour to its distribution centres to send photographs of every new temporary worker coming onto site
- **Forest Garden** requires agency workers to undergo the same checks and treatment as permanent staff

¹⁹ 'The good, the bad and the ugly: The experience of agency workers and the policy response', Resolution Foundation, 30 November 2018.

²⁰ Developed by allianceHR and run in partnership with the Association of Labour Providers.

<https://responsiblerecruitmenttoolkit.org>.

²¹As above, <https://www.clearviewassurance.com>.

3.5.1 Recruitment fees

Worker recruitment fees are illegal in the UK and many other countries. Nevertheless, their prevalence is often a prime cause for trapping migrant workers into debt bondage and forced labour. The ILO estimates that 16 million²² people are in forced labour in private sector businesses globally, and just over half are in some form of debt bondage.

Marks and Spencer, Walmart and Tesco are signatories to the Leadership Group for Responsible Recruitment²³ which is promoting the Employer Pays Principle – that no worker should pay for a job. The group is aiming to eradicate recruitment fees by 2026.

Many other retailers are backing the Employer Pays Principle through the British Retail Consortium's (BRC) Better Retail, Better World initiative,²⁴ which aligns with the UN SDGs in promoting decent work and tackling modern slavery. Signatories to the BRC initiative have pledged to embed this policy by 2020.

The focus of much of this work is abroad, but companies should not overlook the UK where migrant workers can become trapped in a spiral of debt through paying travel costs and other charges. This is against the ILO recommendation that "recruitment fees and related costs, must not be borne by workers or jobseekers".²⁵ UK businesses need to develop a better understanding of the costs borne by migrant workers.

3.5.2 Social auditing

Over the past decade, retailers have been increasingly commissioning third party ethical audits of their supply chain, using social auditing platforms such as Sedex or amfori BSCI. Some retailers have adopted the Social Accountability International SA 8000 standard,²⁶ an auditable standard for managing human rights. Suppliers are also using the Stronger Together auditing tool.²⁷ But, in general, most activity is focused on tier one suppliers and regions or sectors of highest risk.

Social auditing is usually too broad to discover incidences of modern slavery, and in many cases has not been designed to do so. But audits can be useful in raising labour standards.

Tesco has been using in-house responsible sourcing specialists and third parties to carry in-depth audits against the ETI base code. It reports that it has uncovered and taken steps to address issues such as excessive working hours and late payment of wages.

Marks and Spencer is recording incidences of noncompliance under the heading "employment is freely chosen" from its ethical audits. It either verifies evidence of suppliers putting corrective actions in place or is working with them to achieve this.

Meanwhile, Sainsbury's is operating a third-party social audit programme across its suppliers. The retailer says it is absorbing elements of social audits into its main assessment programme.

²² ILO, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, 2017.

²³ An industry collaboration launched by the Institute for Human Rights for Business in 2016: <https://www.ihrb.org/employerpays/leadership-group-for-responsible-recruitment>.

²⁴ <https://brc.org.uk/making-a-difference/priorities/better-retail-better-world>.

²⁵ ILO, Geneva, November 2018.

²⁶ <https://www.bsigroup.com/en-GB/sa8000-social-accountability>.

²⁷ <https://www.stronger2gether.org>.

Much social auditing is based around announced or pre-announced audits, but in better practice, some organisations are increasing the number of unannounced audits or company visits to high risk areas. For example, the Co-op reported that 63% of independent ethical audits to supplier sites in 2018 were unannounced or semi-announced.

As good practice, organisations are also evolving more effective forms of auditing, such as Fast Forward²⁸ which looks for specific identifiers of modern slavery in UK clothing supply chains.

3.5.3 Worker engagement

Educating workers on their rights should be a priority and in good practice, companies are issuing information to migrant workers in their own languages. Many organisations are now carrying out training to raise awareness and promoting the Modern Slavery Helpline or multi-language whistleblowing hotlines. In better practice, this training is being shared at lower levels of supply chains.

In many cases, the most vulnerable workers will be mistrustful of talking to employers or the authorities. G's is addressing this by introducing videos and raising awareness to explain to workers how their anonymity can be assured through its reporting channels.

There are initiatives to engage with workers using apps or mobile phones. Some companies are piloting SMS messages for workers in remote regions – for example, Sainsbury's and its tea supply chains. The Co-op is trialling worker interviews with technology specialist &Wider, to bolster the findings of its standard audits. Workers are picked at random to take part in phone interviews or surveys before and after an official audit takes place. The retailer has been trialling the system in the UK and Kenya.

3.5.4 Training and education

The majority of retailers and suppliers have embarked on training courses, using providers such as Stronger Together, Unseen, Hope for Justice and the Slave Free Alliance.

Many companies have rolled out basic awareness training and e-learning modules to cover all employees. As a next step of evolution, some companies are making these modules available or even compulsory for suppliers.

But one-off training sessions will not be effective for long. In better practice, some organisations are keeping learning materials updated and refreshing knowledge and training on a regular basis.

Good practice includes providing more in-depth training for staff in operational roles. The next step is using training to create anti-slavery champions in different departments, enabling them to view business strategy through a modern slavery lens.

Leading practice involves extending training to the supply chain, to help build capacity and understanding in smaller and often less well-resourced companies.

²⁸ <https://www.fastforwarduk.org/>.

3.5.5 UK-based good practice

There is no substitute for proactive daily engagement with workers on site. Leading practice for UK suppliers involves embedding all processes relating to ethical labour management into their site operations. For example:

- **G's** staff use an ongoing process of supplementary questions and informal conversations to enhance and build on standard ethical audits. Staff feed their findings into the company's risk register of labour providers. Worker welfare is tracked through a system of "yellow flag" indicators, designed to give early warning of potential exploitation issues. As G's observes, exploitation is not always masterminded by criminals, but could develop from worker to worker transactions. As a result, the company has detected problems at an early stage, such as workers overcharging each other for accommodation.
- **ABP Food Group** has a full-time modern slavery prevention officer who regularly visits sites and interviews workers, identifying any actions that need addressing. This could include issues such as workers not understanding their payslips. Serious violations are escalated to the board. ABP has three to four people in the business working on anti-slavery initiatives at any time, commenting that "having dedicated staff keeps this issue alive."²⁹
- **Fresca Group** is working to create a culture where all workers are alert to modern slavery risks and are looking out for each other's wellbeing, stating: "If management discovers slavery, this is already too late, as the problem will have been going on for some time, with untold damage done to victims. Co-workers are best placed to spot exploitation in the first instance."³⁰
- **Forest Garden** is using a network of trusted Eastern European employees, trained to spot the signs of slavery and to keep in touch informally with migrant workers coming into the business.

3.6 Collaboration

Retailers frequently describe the anti-slavery agenda as "pre-competitive", and consequently ideal for collaboration between peers. Industry commentators observe that there is still not enough sharing from all parties. Nevertheless, examples of collaboration include:

- The **Greater Manchester Modern Slavery Business Network**, which the Co-op helped to launch in 2018, in which local industry, NGO and law enforcement representatives come together to share their experiences and exchange ideas on best practice
- The **Retailer Protocol**, backed by the BRC, the GLAA and Stronger Together. This sets an agreed approach for dealing with incidents of worker exploitation. Suppliers report that they find the protocol helpful, as it creates more consistency in client responses when exploitation issues emerge
- **FNET** (Food Network for Ethical Trade), a supplier-led organisation for building long term capability around ethical practice and risk assessment
- The **Indirect Procurement Human Rights Forum**, for goods not for resale. The Forum has a modern slavery group that is setting minimum standards for workers in these supply chains

²⁹ Comments from IASC research interview.

³⁰ Comments from IASC research interview.

3.7 Support for modern slavery survivors

It can take many years for survivors of slavery to recover enough to lead independent lives, and some struggle to reach that point. But there is an opportunity for industry to play a role in rehabilitation, either through offering employment, practical help or training. Examples include:

Bright Future

Launched by the Co-op and NGO City Hearts in 2017, Bright Future³¹ places survivors that are ready to work into stable employment, and their progress is carefully monitored by the employer and supporting charities. The initiative is currently supported by 28 charities and more than 20 businesses. This year it is being turned into a co-operative consortium.

One survivor of Operation Fort has been through the Bright Future programme. For half a year he worked at a Co-op distribution centre. However, suffering from stress and long-term injuries, he was transferred to a food store for a further six months. The survivor went on to work at a Co-op supplier and is now independently seeking employment closer to his home.

Bank accounts

Modern slavery survivors often have poor credit ratings, due to fraud being carried out in their name, and struggle to open new bank accounts. HSBC has launched a bank account for survivors.³²

Life skills

Some businesses are supporting life skills courses for modern slavery survivors. For example, Asda is launching a cooking skills course with City hearts.³³

³¹ www.co-operative.coop/ethics/bright-future.

³² www.about.hsbc.co.uk/news-and-media/hsbc-uk-provides-support-for-survivors-of-human-trafficking.

³³ Asda Modern Slavery Statement, 2019.

4. CHALLENGES FOR THE SECTOR

4.1 Labour and migration vulnerabilities

The UK agricultural sector currently requires around 70,000 seasonal workers every year.³⁴ The National Farmers Union Seasonal Supply of Labour survey, which goes out to the main labour providers and some of the largest grower businesses that recruit directly, estimates that 99% of seasonal labour is provided by EU workers.³⁵

After the Brexit transition period ends in December 2020, the government will be introducing a points-based immigration system for all nationalities.³⁶ After this date, workers entering the UK from EU countries will lose their automatic right to work.

To obtain a regular working visa, individuals will need the offer of a job and to be earning at least £25,600. Low skilled agricultural workers are unlikely to meet this salary threshold.

If there are significant labour shortages, unscrupulous employers and organised criminals may exploit the vulnerable by trafficking them to the UK to work.

4.2 The Seasonal Agricultural Workers pilot scheme

The government has been trialling the Seasonal Agricultural Workers Scheme (SAWS) with two labour agencies, ProForce and Concordia, recruiting 2,500 seasonal agricultural workers from Moldova and the Ukraine. The scheme is being expanded to 10,000 workers in 2020.³⁷

If numbers are capped at 10,000 on the scheme, this raises some major challenges for the sector, not only because this is a fraction of the overall workforce needed annually. Other concerns include:

- There is a risk of hidden recruitment fees in the countries of origin
- Many workers are paying for their visa and other administration costs – this is against the ILO definition of fair recruitment
- In order to enable free movement of people, the visa is not attached to a single employer. However, evidence suggests that many workers on the pilot are not aware of this
- Applying for visas is complex, and the process is not always carried out in the worker's native language. Workers have little recourse for correcting mistakes

³⁴ <https://www.nfuonline.com/news/latest-news/nfu-responds-to-immigration-policy/>.

³⁵ The Seasonal Supply of Labour survey runs monthly. For more information see: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/articles/labourintheagricultureindustry/2018-02-06>.

³⁶ <https://www.gov.uk/government/publications/the-uks-points-based-immigration-system-policy-statement/the-uks-points-based-immigration-system-policy-statement>.

³⁷ <https://www.gov.uk/government/news/10000-workers-to-boost-british-farming-sector>.

5. CONCLUSION

The criminal network behind Operation Fort was active before the passing of the Modern Slavery Act and continued for years after. If it is to teach us anything, it is that no supply chain is safe from modern slavery, and that UK based organisations cannot afford to be complacent about their domestic operations, even when addressing high profile atrocities overseas.

It is positive to see industry engaging with NGO partnerships, initiatives and stakeholder groups. But these activities should be a springboard to internal change rather than a substitute for meaningful action. Any organisation that believes it can entirely outsource its ethical responsibilities is failing to grasp the difficulty of the task in hand.

Modern slavery is a complex criminal activity that is continually evolving. Businesses must evolve too. The eradication of labour exploitation should be integrated into long term strategy, be led from the top of an organisation, and inform the day to day activities of every department. Similarly, those organisations at the top of supply chains bear a responsibility for supporting their suppliers into sustainable improvements.

All companies are on a journey, but while some leading businesses are investing in their supply chains and working hard to understand risk, others are barely paying lip service to minimum legal obligations.

Despite the passing of the Modern Slavery Act, responsible suppliers are still being forced to compete on price with those that have much lower standards. It is important that the companies that are genuinely driving improvement receive the commercial encouragement and recognition that they deserve, from both retail clients and consumers.

On the following page, this review suggests tiers of progress that organisations will go through to safeguard workers. The model is not fixed and should develop as understanding of modern slavery and related criminality evolves.

Enlightened businesses are now aligning their operations to a wider purpose for social good. We must make a commitment to eradicating all forms of modern slavery, human trafficking and labour exploitation an integral part of this global movement.

5.1 IASC maturity framework

BARELY ACHIEVING COMPLIANCE

- Superficial modern slavery statement – policy but no action
- Little or no mapping of supply chains
- Minimal awareness of modern slavery amongst staff
- Sole reliance on audits
- No protocol for dealing with labour abuse

MEETING BASIC EXPECTATIONS

- Evidence of activity or improvement in modern slavery statement
- Identifying areas of high-risk in the business and supply chains
- Educating suppliers on policy and setting expectations
- Regular staff training and awareness-raising exercises
- Basic protocols for dealing with labour exploitation cases
- Installing whistleblowing hotlines

EVOLVING GOOD PRACTICE

- External challenge or working groups informing strategy
- Going beyond auditing – deep dives and unannounced visits
- Cascading ethical standards throughout supply chains
- In-depth training for staff in key roles, such as procurement
- Commitment to worker engagement
- Implementing the Employer Pays principle

LEADING ON HUMAN RIGHTS INNOVATION

- Board leading on human rights strategy
- Using data analytics to identify risk
- Local, national, international intelligence gathering
- Supporting suppliers to develop ethical competencies
- Pioneering new ways of worker engagement, using technology
- Factoring in the true cost of labour

5.2 The Commissioner's agenda for action in 2020

CEOs must recognise modern slavery whistle blowers across their supply chains – Celebrate the heroes that have uncovered wrongdoing.

Companies like to talk about their robust human rights policies and zero tolerance for modern slavery, but to what extent is the wider workforce engaged in this agenda? What are the stories that are repeated in the organisation where modern slavery has been called out? Are the heroes recognised in the culture? Are these stories told at the water cooler? Clearly there are sensitivities around identifying victims, but it is important that those who challenge wrongdoing should be rewarded.

Boards must incentivise actions not words — Top-management bonuses should depend on anti-slavery wins.

The steps taken by top executives to promote decent work and to reduce the risk of modern slavery in their organisations and their supply chains should be factored in to their bonus structure. It is too easy for senior executives to declare commitment and profess zero tolerance. Recognition of genuine activity and improvement in compensation arrangements would send a very strong signal.

Annual reports should clearly explain provision for wages – If the total (non-management) labour costs in the supply chain are lower than minimum wages paid, companies should explain why.

There are many examples of approaches such as reverse auction where the price paid has little relationship to labour costs incurred. Procurement teams should show evidence that they have factored in the true cost of labour into goods and services.

If the price of goods is very low, then this should trigger questions about the potential for trafficking and exploitation.

Ethical audits should be unannounced – Companies should also explain how they are engaging with workers across their supply chains to understand vulnerabilities and human rights risks.

Most companies use social auditors for their own organisation and require their suppliers to do the same. However, most audits are announced, and the results are not always appropriately shared. Companies should commit to undertaking more unannounced audits and developing new technologies of obtaining feedback from workers.

5.3 Letter from the Commissioner



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16 July 2019

Dear ,

I am writing to you in my position as the Independent Anti-Slavery Commissioner.

On 5th July 2019 eight offenders from two criminal gangs were convicted of slavery, trafficking and money laundering offences after the UK's largest-ever modern slavery network was exposed. 'Operation Fort' uncovered vulnerable victims who had been trafficked from Poland with the promise of well-paid jobs. Ninety-two potential victims of modern slavery were identified, although police believe that up to 400 victims in total were exploited by the gang.

When victims arrived in the UK, they were forced to live in squalor and work long days in farms and factories. These included rubbish recycling, parcel sorting, vegetable harvesting, constructing fence panelling and construction work. The victims received up to £20 a week whilst their perpetrators made more than £2m between 2012 and 2017. The poverty to which some of the victims was subjected led to them relying on food banks and soup kitchens to survive.

The senior police investigator, Detective Chief Inspector Dale describes the exploitation;

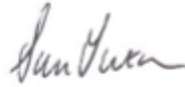
"What they did was abhorrent: they subjected victims to a demi-life of misery and poverty. They forced them into work and, if they objected, they were beaten or threatened with violence and told family members back home would be attacked."

Section 54 of the Modern Slavery Act 2015 states that commercial organisations with a turnover of £36 million or above must produce a modern slavery statement setting out the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Some of the victims in this case were working at[]. I understand that [] supplies such products to your company. I would like to be reassured that in the light of this case you are reviewing the action your organisation takes to ensure that suppliers are not using slave labour.

This case illustrates the enormous harm that victims of exploitation suffer. Your business has a role to play in identifying and preventing exploitation.

I look forward to your response.



Independent Anti-Slavery Commissioner



