

24 November 2020

Dear

Following our correspondence on Operation Fort, the largest modern slavery network so far uncovered in the UK, I wanted to update you on our findings and recent activities. I appreciate the significant way in which your business has been impacted by the pandemic and that this will have put supply chains under further stress.

Last summer I wrote to 15 household brands – supermarkets and DIY stores – whose supply chains were linked to the Operation Fort investigation. All responded, and I met with a number of sustainability, procurement and CSR teams to discuss their response to the case. Over the course of our engagement my office read modern slavery statements and started to build a picture of anti-exploitation initiatives in agriculture, food production and manufacturing.

We also engaged with a labour provider and some tier one suppliers. Fresh produce provider G's invited us to its operations in Cambridgeshire. Subsequently, in January, we supported a conference at G's attended by 202 professionals from across the sector. One of the outcomes of this well-attended meeting was the commitment to pilot an industry-led intelligence sharing group. I am pleased to see that the Modern Slavery Intelligence Network is evolving into a multi-stakeholder platform supported by a number of retailers and suppliers.

The IASC review: [*Operation Fort – What businesses should learn from the UK's largest anti-slavery prosecution*](#), was launched in June. Here we set out how Polish criminals infiltrated the supply chains of legitimate businesses with exploited labour, and how they operated undisturbed for several years.

There are many lessons to learn from Operation Fort and these lessons should be urgently considered, given the scale of the crime – involving an estimated 400 victims – and the extreme, life-changing levels of physical and emotional abuse that each victim suffered.

Safeguarding the workforce is an ongoing challenge. Any sizeable supply chain is at risk of labour exploitation and will continue to be so: the rewards for criminals are high, and their methods constantly evolving. In addition, the coronavirus pandemic, and the changing demographic of the workforce as we exit the EU, are presenting supply chains with new stressors and challenges.

As we have been talking with businesses, we have detected varying levels of sophistication in approaching the anti-exploitation agenda. The poorest performers are treating the Modern Slavery Act as a compliance exercise that is unlikely to yield meaningful change. The best are embedding human rights frameworks across their operations, doing deep dives into their supply chains and pioneering new methods of worker engagement. Strong leadership at senior board level is often a crucial differentiator.

My office has developed a [framework](#) to reflect these differing levels of maturity. It is not intended to be a precise measurement - we expect it to evolve as our collective understanding of this area deepens. However, some NGOs are using the framework informally in their interaction with businesses, as well as a lens with which to assess modern slavery statements.

I hope that you have found our Operation Fort review useful and would welcome any thoughts on our framework, in particular, where you would place your business within it, and the next steps you plan to take.

I look forward to receiving your response. In the interests of transparency, please respond in a way that enables me to publish your letter on my website.

Yours sincerely,

A handwritten signature in dark blue ink, appearing to read "Dan Yuen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Independent Anti-Slavery Commissioner