

OPERATION FORT REVISITED

Retailers and suppliers respond to the UK's
largest anti-slavery prosecution

May 2021

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FOREWORD

Dame Sara Thornton – Independent Anti-Slavery Commissioner

In 2019 a successful West Midlands Police investigation brought to justice an organised crime gang which had exploited up to 400 Polish men and women over several years. The victims worked in a number of businesses that supplied goods to the major food retailers and home improvement stores. I therefore wrote to the chief executive officers of these businesses and asked them to explain what they were doing to ensure that they were addressing the risk of slavery and trafficking in their organisations and supply chains.¹

Their responses to that question then informed the publication of ‘Operation Fort - What businesses should learn from the UK’s largest anti-slavery prosecution’ in June 2020.² I subsequently wrote again to the CEOs³ to ask them to respond to the review and in particular asked for their views on the maturity framework that we had developed, where they would position their business and what next steps they had planned. All businesses replied, and I would like to thank them for their detailed and thoughtful responses. The full collection of correspondence will be published on my website.

There remains a range of responses but overall I was encouraged by the way in which business was improving its response to supply chain management, the training of staff, collaboration across the sector and worker engagement. The tone was being set at the top in many businesses and there was clear commitment to protecting the most vulnerable workers from modern slavery and human trafficking.

¹ See Appendix C.

² Independent Anti-Slavery Commissioner (IASC) (2020), ‘Operation Fort - What businesses should learn from the UK’s largest anti-slavery prosecution’:
<http://www.antislaverycommissioner.co.uk/media/1421/iasc-operation-fort-review-june-2020.pdf>.

³ See Appendix D.

The effect of Operation Fort on the sector

Many companies said that the seriousness and severity of the Operation Fort case, which involved an estimated 400 Polish victims being swapped in and out of their supply chains over several years, had been a driver for improvement and peer to peer collaboration.

The most significant cross-sector response has been the launch of the Modern Slavery Intelligence Network (MSIN), initially convened by Marks and Spencer and G's. This is an 18-month pilot project to test enhanced data sharing between retailers and major suppliers in the agri-food sector. I am pleased that 15 companies are participating and hope that it will create effective channels for detecting and disrupting modern slavery and labour exploitation, while strengthening links with law enforcement. The MSIN should also provide valuable intelligence to inform and strengthen prevention activities.

The MSIN is an excellent example of how industry can lead on initiatives for the collective good. I hope that the 18-month pilot paves the way towards a permanent and evolving collaboration that could be a model for other sectors.

The maturity framework⁴

The majority of companies said that they had found the framework useful, both for assessing performance and as a focus for improvement. Marks and Spencer found the four clearly defined stages were helpful for engagement with investors, as well as within the business. However, several retailers found themselves in more than one category, for example, fulfilling most of meeting basic expectations, but also achieving some elements of evolving good practice, or mixing in some aspects of leading on human rights innovation.

This is understandable as the framework was intended to start discussions rather than impose a strict chronology of when activities should be started or completed. Nevertheless, it is encouraging that many companies are integrating the IASC's matrix and agenda for action⁵ into their future planning, with several restating their commitment to continual improvement.

Governance, strategy and leadership

There was evidence of more strategic leadership in tackling modern slavery and labour exploitation. This manifested as a mixture of policies, working groups, steering committees and reviews.

In an example of best practice, Sainsbury's initiated an internal audit of its modern slavery governance and procedures in 2020. The retailer will be using its findings to identify areas of improvement and inform future strategy. Kingfisher started a cross-business human rights due diligence process to highlight the most salient human rights issues and to decide on priorities. It has also developed a new protocol for dealing with incidences of modern slavery, in order to coordinate future responses more effectively and consistently.

⁴ See Appendix A and IASC (2020), 'Operation Fort review - IASC Maturity Framework': <https://www.antislaverycommissioner.co.uk/media/1428/iasc-operation-fort-review-june-2020-iasc-maturity-framework.pdf>.

⁵ See Appendix B and IASC (2020), 'Operation Fort review - Commissioner's Agenda for Action in 2020': <https://www.antislaverycommissioner.co.uk/media/1427/iasc-operation-fort-review-june-2020-commissioners-agenda-for-action-in-2020.pdf>.

John Lewis has established a cross-functional working group on responsible employment that is focused on continually improving the organisation's approach to combatting modern slavery. Tesco says that its internal modern slavery working group works closely with suppliers, the Gangmasters and Labour Abuse Authority and law enforcement agencies. At Marks and Spencer, the board has agreed to create a formal environmental social and corporate governance (ESG) subcommittee that should "add vigour to and challenge" the corporate ESG agenda. Forest Garden has three steering groups focusing on this area that meet regularly, one of which is chaired by CEO Guy Grainger. Meanwhile, the Morrisons modern slavery steering group meets quarterly and is chaired by one of its people directors. Ocado held a series of modern slavery working groups last year. Travis Perkins' modern slavery strategy is sponsored by the group leadership team.

On policies, Sainsbury's has updated its sustainable sourcing policies, to reflect the Consumer Goods Forum's (CGF) forced labour priority principles that every worker should have freedom of movement, no worker should pay for a job and no worker should be indebted or coerced to work. G's plans to promote uptake of the UN Guiding Principles (UNGP) agenda with other businesses, in particular SMEs. This will be part of G's rollout of its new human rights policy which will constitute a broader and more dynamic framework to fight slavery as well as other social risks in supply chains. G's is hoping that wider implementation of the UNGP framework will facilitate more mature discussion about risk in industry.

In examples of external leadership at CEO level, Steve Rowe of Marks and Spencer has recently become co-sponsor of the CGF's Coalition on Forced Labour/Human Rights, and sits on the coalition's governance board to oversee progress. Similarly, Sainsbury's CEO Simon Roberts is retailer college co-sponsor of the CGF's Sustainable Supply Chains Initiative, which also covers human rights.

Corporate responsibility, Covid-19 and industry collaborations

Purpose-led business, that takes into account people, profit and planet, should be the foundation of resilient and socially responsible supply chains. Several retailers mentioned the need to protect not only vulnerable workers, but also the wider communities in which they operate. The last twelve months, which were dominated by the Covid-19 pandemic, have put this to the test.

Responding to the challenging environment Ocado Group, which supplies infrastructure, technology, distribution and warehousing services to Ocado Retail, gave its frontline workers a 10% pay bonus at the height of pandemic, and introduced new health and safety and mental health support systems for all employees.

Marks and Spencer has been in regular contact with its top 30 food suppliers to understand the impact of the pandemic on their business and to find ways of providing support. It also used its worker voice technology to engage directly with workers, and provided additional resources through the Food Network for Ethical Trade.

Asda, which is a member of the West Yorkshire Anti-Slavery Partnership, has noted an increase in labour-related incidents and allegations during the pandemic. This has enabled it to identify gaps in its processes and it is now strengthening its reporting and escalation protocols.

Collaboration has been important during this time, and Co-op has taken a leading role in building a coalition of multiple industry partners to deliver supplier webinars, and to develop guidance⁶

⁶ Food Farm Help website: <https://www.foodfarmhelp.com/>.

for the food, horticulture and agriculture industries to better manage risks during the pandemic. The Co-op also launched a Global Wellbeing Charter⁷ which sets out how it has supported workers and producers globally.

Other welcome examples of cross-sector collaboration include a relaunch of the Responsible Car Wash Scheme (RCWS),⁸ a pilot project that seeks to raise standards and compliance in a sector with well documented labour exploitation risks. RCWS founder members include Tesco, Sainsbury's, Asda and Morrisons. Meanwhile, Bright Future, the Co-op led initiative to create sustainable work for survivors of modern slavery has expanded, with significant industry and NGO support, to become an independent co-operative in its own right.

It is also encouraging to see the majority of businesses inviting external challenge as they engage with anti-slavery experts such as Unseen, Slave Free Alliance, Stronger Together and the Wilberforce Institute at the University of Hull for training, to understand risk, and to assess the impact of their business on workers and supply chains.

Training and awareness raising

Training and awareness raising of modern slavery risks should be a basic element of any corporate strategy, and most businesses have done at least a minimal level of engagement. Many had developed e-learning modules. I am pleased that a number of businesses are developing a more targeted response by implementing specialised training of colleagues in strategic business roles. For example, Morrisons is carrying out in-depth training for colleagues in its people, procurement and operations. Travis Perkins is rolling out specialised training for key staff in its operations, commercial, human resources and freighting teams. John Lewis is implementing a specific training programme for all employees that recruit, manage or work alongside its contingency (or outsourced) labour. Forest Garden provided training for employees "at every level of the business". And, last year, Lidl implemented a training programme on modern slavery risk for all employee relations consultants in its regional distribution centres.

As well as refreshing its modern slavery training, Asda has increased its awareness raising campaigns, which the company says have helped it react, investigate and take immediate action on incidents in collaboration with the authorities. Meanwhile Aldi has committed to training up a number of 'anti-slavery champions' across its business.

The Co-op commissioned the University of Nottingham Rights Lab to conduct a review of its modern slavery awareness-raising campaigns and strategy for to supporting and advocating for victims of modern slavery. The resulting report contains some lessons on how businesses can engage more effectively with stakeholders.⁹

Training needs to be regularly refreshed to keep pace with evolving criminality around modern slavery risks. With this in mind, Sainsbury's has been updating its materials and videos to incorporate not only the findings of Operation Fort, but also Operation Melrose, the 2019 case in which 39 Vietnamese people died in a refrigerated trailer in Grays, Essex.

⁷ Global wellbeing charter: <https://coop4colleagues.files.wordpress.com/2020/07/co-op-global-wellbeing-charter.pdf>.

⁸ Responsible Car Wash Scheme website: <https://rcws.org.uk/>.

⁹ University of Nottingham Rights Lab (2021), 'Campaigning for change: The Co-op's approach to tackling modern slavery and supporting victims': <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2021/march/campaigning-for-change-the-co-ops-approach-to-tackling-modern-slavery-and-supporting-victims.pdf>.

Suppliers

Situated at the top of supply chains, retailers can have a powerful influence on producers, growers and manufacturers in the lower tiers. They also have a responsibility to set the right tone in their contracts, pricing and business arrangements. This has never been more important: as the demographic of the UK workforce changes, labour shortages in many sectors could encourage conditions of irregular working. To mitigate this risk, John Lewis is reviewing its due diligence strategies. It is also supporting its suppliers to develop and implement robust human rights strategies.

In further examples of retailers leveraging positive influence, Lidl has introduced joint corporate social responsibility plans that must be agreed with suppliers as part of the procurement process. Its tier one suppliers are contractually obliged to undergo awareness training with expert partners Stronger Together. Other businesses, including the Co-op, are working with suppliers to identify high risk areas and put action plans in place.

In the UK, Aldi has carried out modern slavery awareness training workshops with its construction contractors. Similarly, Lidl has carried out a human rights impact assessment and is developing training for employees and contractors involved with its store build programme. Tesco has launched a new human rights policy for suppliers of goods and services not for resale, which includes high risk sectors of labour agencies, cleaning and security.

Many businesses acknowledged the need to address the heightened risk posed by temporary labour. Travis Perkins has implemented a process of photographic ID cross-checking for temporary workers in its distribution centres. It is also introducing unannounced audits to sites – having recently introduced semi-announced audits. Meanwhile Forest Garden has started conducting unannounced audits of its labour and recruitment partners, in partnership with specialist NGOs Slave Free Alliance and Hope for Justice.

A large number of businesses are promoting the Responsible Recruitment Toolkit (RRT),¹⁰ which provides free training for labour providers. The Co-op has incorporated the RRT into its Future of Food Toolkit, which is available to its global supplier base. Kingfisher plans to expand the rollout of the RRT to its international supply chains. Meanwhile, Asda commissioned a third party independent review of its due diligence activities for labour providers and became a sponsor of the RRT in early 2020.

Ongoing reports of atrocities against the Uighurs in China have led to global concerns about forced and prison labour from the Xinjiang region in international supply chains. Asda says it has strong controls in place to prevent sourcing from the region, and has taken steps to reinforce the message with suppliers.

Worker rights and conditions

Several businesses acknowledged the wider role that they could play in supporting wellbeing of workers and their communities. Lidl has made a commitment to work towards achieving living incomes and living wages within its global supply chains and is initially focusing on higher risk sectors of textiles, bananas, cocoa and orange juice.

¹⁰ Responsible Recruitment Toolkit website: <https://responsiblerecruitmenttoolkit.org/>.

John Lewis is also scaling up its Waitrose Foundation programme, which supports businesses and rural communities in its international supply chains. The Foundation funds projects in partnership with local charities and in consultation with workers.

The Employer Pays Principle,¹¹ that no worker should pay a recruitment fee, is receiving substantial support from this sector, although not all businesses had established how they would implement it. In an encouraging step, Tesco had “operationalised” the principle in highest risk supply chains in Asia.

The installation of whistle blowing hotlines was frequently cited, although some companies were going further to understand the issues that staff were facing. Morrisons, for example, carries out quarterly welfare conversations and surveys across all its sites.

Worker voice, in which companies and clients engage more directly with people in their operations and supply chains, is an evolving area of good practice. It presents the opportunity for brands and clients to understand the worker experience at scale, and could provide a valuable source of data, identifying need for action and informing future strategy.

John Lewis is expanding its Better Jobs programme into new countries and new supply chains within the UK. The programme uses technology to support direct feedback from workers on their working conditions. The Co-op reports that it has found new ways of engagement, from direct worker reporting, worker surveys to virtual site assessments. Tesco is piloting &Wider, a simple mobile survey for workers, in a sample of its key supply chains. Meanwhile Marks and Spencer has completed its pilot of worker voice technology with 4,000 workers in the UK and Ireland across 45 sites. Following the success of the pilot, Marks and Spencer will be rolling out worker voice technology to all its UK food suppliers in 2021.

Transparency

Under section 54 of the Modern Slavery Act 2015, all businesses with a turnover of more than £36 million are required to report on the steps that they are taking to map out, disrupt and prevent modern slavery risk in their operations and supply chains. As a consumer-driven sector, retailers are under more pressure than many businesses to make detailed disclosures in their modern slavery statements. However, achieving full transparency is a long term and complex undertaking, given the numbers of products and ingredients that retailers handle on a daily basis. Fear of negative reputational consequences can be an additional barrier to disclosure.

Despite this, increasing transparency will be an important part of industry’s evolving response to modern slavery risk. As well as encouraging accountability and incentivising action, it should also generate more nuanced and sophisticated discussions with stakeholders, including investors and the general public.

Co-op has been a pioneer in this area, having published details of the audits in its food supply chain for over 15 years. It has also published its salient risks, and the steps that it has taken to address them. In its most recent modern slavery statement, the Co-op published details of its tier one production sites with worker details. It has also disclosed the grievances that have been raised in its food supply chains.

In other examples, Lidl has committed to publishing three human rights impacts assessments a year until 2025. Since 2019, it has been publishing supply chain information across its tier one

¹¹ The Employer Pays Principle: <https://www.ihrb.org/employerpays/the-employer-pays-principle>.

food and non-food supply chains. Lidl is now working to increase supply chain transparency beyond tier one. Sainsbury's has committed to setting a series of human rights key performance indicators, including modern slavery, as part of its Beyond 2020 strategy. It will be measuring and publishing its progress annually.

Supplier Forest Garden has invited a number of major clients into its business so that it can demonstrate its processes and share best practice. Forest Garden says that this culture of transparency has helped forge stronger relationships.

In an example of leading on human rights innovation, Marks and Spencer has published the results of its collaboration with Oxfam.¹² In 2018 it commissioned the NGO to carry out in-depth research on its Indian and UK supply chains. The aim was to understand the experiences and issues faced by workers and suppliers. Having remediated and resolved worker concerns raised by the study, Marks and Spencer is now applying learning to other parts of the business. As well as making its findings public, the retailer has also committed to sharing its lessons with wider industry and stakeholders. This level of public disclosure was a courageous step and should do much to drive wider discussion across the sector. In an ideal world, activities such as these should become an industry norm.

Risk assessment and intelligence

Understanding risk, and having effective mechanisms for gathering intelligence should underpin any anti-slavery or wider human rights strategy. Aside from the signing up to the Modern Slavery Intelligence Network, many businesses are supporting other initiatives such as Unseen's secure Helpline Business Portal, which is linked to the Modern Slavery Helpline.

Sainsbury's is taking a risk-based approach across its operations globally. It has developed a bespoke modern slavery assessment tool that combines its own data with economic models of sectors such as agriculture and manufacturing. This, says Sainsbury's, gives visibility into multiple tiers of its supply chains, and helps to inform discussions with suppliers. The retailer is also gathering information on recruitment flows and supporting collaborative initiatives to map global recruitment trends.

Tesco gathers information about emerging risks through its in-country responsible sourcing specialists across nine sourcing countries. This is facilitated through relationships with key external stakeholders, such as law enforcement bodies and anti-slavery NGOs. Meanwhile major supplier G's has developed a range of bespoke assessment analytics and worker engagement tools to track risk and trends in its operations.

Finally, John Lewis is increasing the number of deep dive risk assessments it carries out to support its compliance programmes. In the past year it has commissioned a study into the availability of grievance mechanisms for workers within its UK wild-caught fish supply chains, which it hopes to continue with the easing of Covid-19 restrictions.

Conclusion and next steps

Operation Fort has had a lasting impact on the agri-food sector. It has triggered innovative approaches, such as the Modern Slavery Intelligence Network, helped to focus leadership strategy and inject new purpose into ongoing anti-slavery activities.

¹² Oxfam (2021), 'Working in Marks and Spencer's Food and Footwear Supply Chains': <https://policy-practice.oxfam.org/resources/working-in-marks-and-spencers-food-and-footwear-supply-chains-621145/>.

Most retailers have provided evidence of new initiatives and measurable steps that they had taken over the past year, despite, and sometimes because of, the pandemic. Collaborative working between peers and external stakeholders has also helped to spread better practice.

These developments are positive, particularly in such challenging trading and operational conditions, but I would urge businesses to maintain and increase their anti-exploitation focus, embedding the strategy into daily operations wherever possible.

New research published by Focus on Labour Exploitation and Fife Migrants Forum has highlighted the vulnerability of migrant workers in the UK agricultural sector.¹³ The project, carried out in 2020, looked at experiences of European workers on a sample of Scottish farms. The research suggested a number of indicators that could contribute to the International Labour Organization definition of forced labour. These included: deceptive or misleading recruitment and contract substitution, substandard accommodation, difficulty in changing jobs, zero hours contracts combined with moving productivity targets, hazardous work and poor health and safety standards.

We do not yet know the extent to which these findings are reflected elsewhere in the UK. However, the fact that such conditions could exist, in a sector where labour provision is licensed, underscores our collective need for greater vigilance at every level. All businesses, large and small, need to collaborate to create a safe and fair environment for every worker. Your efforts have started us on the journey. We need to maintain the vision and accelerate the pace.

¹³ Focus on Labour Exploitation and Fife Migrants Forum (2021), 'Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot': <https://www.labourexploitation.org/publications/assessment-risks-human-trafficking-forced-labour-uk-seasonal-workers-pilot>.

Appendix A: 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
- Having 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

Appendix B: 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.

Appendix C: Letter from the Commissioner (July 2019)



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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



Appendix D: Letter from the Commissioner (November 2020)

Independent
Anti-Slavery
Commissioner

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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,



Independent Anti-Slavery Commissioner

