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Forest Garden Group Response to the Independent Anti-Slavery Commissioner

Dear Dame Sara,

Many thanks for your recent letter. I read with interest the report published by the IASC, *Operation Fort – What businesses should learn from the UK's largest anti-slavery prosecution*, and the proposed framework for assessing and benchmarking organisations' approach to addressing the requirements of the Modern Slavery Act.

Modern Slavery is a vitally important issue. It is a problem with devastating human consequences that can affect almost any business in any sector. Every effort to help businesses better understand the threats posed by it and how they can proactively address these is therefore very welcome. But in the context of increasingly complex and global supply chains found today, we understand that it can be a difficult problem for organisations to tackle.

As a business that has been in operation for more than 50 years, we are proud to be the largest and most trusted manufacturer and distributor of garden timber products in the UK. Our customers rightly hold us to high standards when it comes to the issue of improper employment practices.

Over recent years we have introduced a number of stringent measures to ensure we operate a 'best practice policy' around this issue in all aspects of our business. We are proud of the progress we have made in this challenging area – but recognise there is always more that can be done.

In this context, looking at the proposed framework we are pleased to see that many of our endeavours in this area appear to fall within the 'Evolving Good Practice' category, and some within the 'Leading on Human Rights Innovation' group.

We would like to take this opportunity to share some key principles from our work in this area that may help other organisations take work in this area beyond box ticking or simply publishing an annual statement:

- Investing in partnerships.** We have worked closely with organisations including the Slave Free Alliance and Hope for Justice. Their expertise in this area has helped us train and educate our team at every level of the business, so that they are aware of the issues surrounding this problem and can effectively identify activities that might indicate illegal employment practices. These partners have worked with us to assess our operation and identify any further potential areas for improvement where we can strengthen our approach. They have also joined us on unannounced audits of our recruitment and labour partners. Investing time and resource in this external perspective and benefitting from insights drawn from across the business landscape has been invaluable.



2. **Building transparency with customers.** This issue is not just front of mind for us, but for our customers in the retail industry too. We are part of their supply chain. We have invited a number of our major clients into our business to see first-hand our work in this area, including the processes we use, and to share best practice with them. This culture of transparency has helped us forge stronger and more productive relationships with them.
3. **Senior ownership within the business.** It is imperative that this issue is driven from the top of the business. We have developed three steering groups, each with a distinct remit, who meet regularly to examine relevant parts of our business around this issue. These include cross-functional teams focusing on our supply chain and personnel or employee function. In my role as Group CEO, I also Chair one of these to ensure there is senior accountability and ownership of this issue across our business.

Additionally, all of these points depend on building robust reporting systems and administrative processes, behind the scenes, along with a thorough audit programme.

We believe that robustly tackling this issue is not just the right the thing to do; it also helps build a company that enjoys the trust of its staff and customers and is therefore commercially successful. We encourage others to take real and meaningful action in this area to address this problem, and leverage the best practice that already exists.

Yours sincerely,



Guy Grainger
Group CEO, Forest Garden Group

