

Methodology for assessing modern slavery statements

Below are the indicators on which we assessed company statements. We used guidance published by the [Home Office](#) and [CORE Coalition](#) as well as our own organizational expertise to select the indicators.

Companies were given credit if they were in the process of developing policies, processes or practices reflected in the indicators.

Companies were not given credit for stating they had processes or practices in place without providing detailed information to support or explain the statement, for example, where a company simply says it has a robust due diligence process in place without more information about the process.

In some cases, a company was given credit for taking action not included in the indicators but which demonstrated good practice.

Organisation's structure, its business and its supply chains

- ❖ Company describes its main products/services/customers
- ❖ Company describes the structure of the organisation including the locations of company operations, including outside the UK
- ❖ Company provides information on its subsidiaries, including those outside the UK
- ❖ The company must provide an adequate description of its structure (including subsidiaries) in the statement; it is not sufficient to provide a link to the website for this information
- ❖ Company discloses the countries from which it sources goods and services
- ❖ Company discloses the names of its suppliers
- ❖ Company discloses the products it sources, or product categories, by country
- ❖ Company states whether it uses suppliers on a seasonal basis
- ❖ Company describes its workforce, such as use of temporary or seasonal workers

Policies in relation to slavery and human trafficking

- ❖ Company has relevant policies in place including but not limited to:
 - Modern Slavery Policy
 - Human Rights Policy
 - Policies that reference the core ILO Fundamental Principles and Rights at Work
 - Employee Code of Conduct
 - Migrant Labour Policy
 - Child Labour Policy
 - Whistleblowing Policy
 - Supplier Code of Conduct
 - Policies concerning remedy and compensation for labour rights abuses
- ❖ Company has a process for development, oversight and enforcement of policies
- ❖ Senior leadership was involved in policy development and sign off
- ❖ External stakeholders informed policy development
- ❖ Policy development included training and awareness raising of such policies among staff
- ❖ Company developed new policies to address modern slavery or revised existing policies to better address modern slavery
- ❖ Departments across the company are involved in the development and implementation of policies

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Due diligence processes in relation to slavery and human trafficking in business and supply chains

- ❖ Company embeds zero tolerance for modern slavery and respect for human rights throughout business. This may include through training or awareness raising activities
- ❖ Company assesses a supplier's risk of forced labour before entering into a contract – looks at performance and practices on labour rights and whether the supplier operates in a high-risk sector or is located in a high-risk region
- ❖ Company has a supplier code of conduct or principles and communicates these expectations to suppliers
- ❖ Company communicates to suppliers it expects them to respect the core ILO labour standards
- ❖ Company requires suppliers to cascade principles down the supply chain
- ❖ Company has supplier participate in self-certification or questionnaire that includes modern slavery component
- ❖ Company includes modern slavery provisions in contracts with suppliers
- ❖ Company provides details of auditing process, including unannounced audits
- ❖ Company provides details of risk management process including whether it covers modern slavery or labour rights generally
- ❖ Monitoring of supplier risk includes engagement with stakeholders, including workers
- ❖ Company has a grievance mechanism in place that is accessible to all workers to raise complaints/concerns to the company

Risk assessment and management

- ❖ Company provides details on risk assessment on human rights or modern slavery risks in supply chains; or the company conducted an assessment that focused on specific commodity/region/group (such as migrant workers)
- ❖ Company discloses modern slavery or forced labour risks that have been identified including information on: country/region where risk was identified, commodity, tier in supply chain, or type of worker identified
- ❖ Company engaged with and sought input from potentially affected rights holders when undertaking an assessment
- ❖ Company engaged with and sought input from external stakeholders when developing its risk assessment
- ❖ Company mapped its supply chain
- ❖ Company provides details of social audits
- ❖ Company developed action plans to address actual or potential risks

Effectiveness

- ❖ Company disclosed identified instances of modern slavery and whether a corrective action plan was implemented
- ❖ Company described results of any corrective action plans
- ❖ Company reviews suppliers' compliance with obligations to uphold code of conduct or supplier principles related to modern slavery
- ❖ Key performance indicators in place; they must be specific to the company and not generic
- ❖ Tracking of key performance indicators including but not limited to:

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- Number of complaints made through a grievance mechanism (if there is one in place) and their resolution
- Number of people trained on modern slavery
- Number of audits conducted, announced or unannounced
- ❖ Company decisions are informed by performance indicators
- ❖ Company provides remedy and compensation to identified victims

Training

- ❖ Company provides modern slavery training to employees at all levels including leadership
- ❖ Content of training is targeted to different groups within the company
- ❖ Company describes the format of training: in-person, e-module, pamphlet, or some other format
- ❖ Training is provided on a regular basis, or employees provided with updates or refresh courses
- ❖ Training was developed in collaboration with external stakeholders or experts