Modern Slavery Statement Guidance
What to include in a modern slavery statement

Organisations are not expected to guarantee that all their supply chains are 'slavery free'. However, statements must describe the steps your organisation has taken during the financial year to deal with modern slavery risks in your supply chains and your own business.

If your organisation has taken no steps to deal with modern slavery risks, you must still publish a statement setting this out.

The Home Office's statutory guidance recommends that you cover the following 6 areas in your statement:

1. Business, Structure and supply chains
2. Modern slavery and human trafficking policies
3. Risk assessment, prevention and mitigation
4. Due diligence processes
5. Effectiveness measured against appropriate KPIs
6. Training and capacity building

Further details on the content to be included for each of the following areas is set out in the template form of statement in Appendix 1 below.

General principles that may help in preparing your statement are to ensure that it is specific to modern slavery, detailed and well-evidenced. Tackling modern slavery and labour exploitation within the construction sector is a journey. Statements should be transparent about uncertainties and include steps being taken to prevent modern slavery in the short and longer term together with how progress will be measured.

Finally, ensure that your statement has the correct level of approval depending on the structure of your business and is updated every year. For companies approval will be by the board of directors, with the statement signed by a director. For partnerships signing will most likely be by a partner.

Further resources:
For more help with structuring your statement, deciding what information to include and planning how to make progress in your future statements, read the Home Office's statutory guidance and the Ethical Trading Initiative's Modern Slavery Statements Evaluation Framework.
Other resources to help you develop and draft your modern slavery statements include:

- Ethical Trading Initiative – Modern Slavery Statement Evaluation Framework
- CORE Coalition – Recommended Content for Modern Slavery Statement
- CORE Coalition – Examples of Weak and Notable Practice
- CORE Coalition – Beyond Compliance: Effective Reporting Under the Modern Slavery Act

Appendix 1

Template Modern Slavery Statement

This statement sets out the steps taken by [NAME OF ORGANISATION] during [TIME PERIOD] to prevent modern slavery and human trafficking in its business and supply chains.
This statement has been approved by [APPROVING BODY E.G. BOARD, PARTNERS] and signed by [NAME], [POSITION], [DATE].

1. Business, structure and supply chains

[Information could include:
- Main products, services and sector(s) the business operates in
- Organisational structure and group relationships
- Mapping of your supply chain, including overview of suppliers providing goods, services, labour or contractors
- Business relationship with suppliers (e.g. seasonal, long term, percentage of factory product suppliers to you)
- Description of the nature of the labour force in own operations and supply chain (e.g. use of temporary / seasonal workers; home workers, migrant workers recruited through labour agencies, agency workers)
- Countries and regions of operation (of business, sourced products, supply chain, etc.) including high-risk relationships with suppliers and others, including trade unions and other bodies representing workers
- Changes since last modern slavery statement]

2. Modern slavery and human trafficking policies

[Information could include:
- Codes of conduct for: employees, suppliers, contractors, business partners
- Human resource policies (recruitment, pay, etc.)
- Purchasing and procurement policies
- Specific policies on issues relevant for the reporting organisation (such as homeworkers, migrant workers, child labour, remedy for victims of labour exploitation, etc.)
- Policies on freedom of association and collective bargaining
- Information on how employees, suppliers etc. can access relevant policies (including where their native language is not English and/or local literacy rates are low)
- Enforcement mechanisms and sanctions for non-compliance with policies, including human trafficking and slavery – this is particularly important since policies only matter to the extent that they are put into practice
- Assessment of relevant policies from third party organisations (suppliers, contractors, business partners)
- Processes for development, sign-off and ownership of policies within business]

3. Risk assessment, prevention and mitigation

[Information could include:
- Risks may be disaggregated by: country, region, sector, relationship (with supplier, contractor, partner), good or service supplied
- Data on likely risks associated with e.g. country or region taken from authoritative sources such as the US State Dept Annual TIP Report; ITUC Human Rights Index, Global Slavery Index
- Identification of known severe and tractable risks (i.e. where the business can do something about them)
- What constitutes a priority or tractable risk should be proportionate to the size, capacity and degree of responsibility borne by the organisation
- Description of engagement with internal and external stakeholders (e.g. buying teams, regional teams, regional NGOs and trade unions) in understanding and prioritising risks]

4. Due Diligence processes

[Information could include:
- Changes in operational practices or in business relationships designed to minimise modern slavery risk
- Description of specific cases of modern slavery (risk) discovered and what steps were taken
- Description of any programmes or initiatives undertaken to manage and mitigate modern slavery risk
- Evidence of direct engagement with suppliers and with workers – going beyond audits and contractual compliance
- Description of grievance mechanisms for workers or other ways in which they can access remedy – in the core business, among contractors and in the supply chain – aligned with relevant best practice
- Evidence of participation in peer-learning groups or other collaborative initiatives for sharing lessons learned and best practice and for taking forward specific programmes
- Evidence of developed incident response plans to be implemented in the event that a case of modern slavery is discovered within the business or its supply chain
- Evidence of stakeholder engagement in responding to specific instances of modern slavery]

5. Effectiveness, measured against appropriate KPIs

[Information could include:
- Description of existing KPIs (e.g. organisation-wide objectives or objectives embedded in performance standards for particular groups of staff)
- An action plan that sets out the organisation's commitments over the next 12 months and aligns KPIs with those commitments
- KPIs that are tailored to the specific actions on modern slavery the organisation has committed to
- KPIs evidence outcomes, not outputs (e.g. measuring changes in awareness of modern slavery among key employees – not just measuring how many people have received training)
- Evidence that findings from ongoing monitoring and review have fed into and influenced business practice
- Details of audit, inspection and review practices (e.g. which third-party auditors are used, what the process is for conducting an audit, what findings are gathered, how the data is then used, etc.)
- Evidence of stakeholder engagement in compiling KPIs, alongside evidence of referral (where appropriate) to established best practice]

6. Training and capacity building

[Information could to include:
- Which groups have been provided with training (e.g. buying teams, senior management, specific contractors, suppliers and their workers) and which groups have not
- Who provides training and capacity building activities
- What the objectives and outcomes are for each activity mentioned
- How training and capacity building take place (e.g. workshops, webinars, videos, manuals, eLearning, etc.)
- Evidence and detail of stakeholder collaboration in developing and implementing training and capacity building programmes
- Information on the frequency and regularity of training
- External training that your employees, or your suppliers' employees, have participated in (such as training provided by the Ethical Trading Initiative)]