

MODERN SLAVERY DUE DILIGENCE CHECKLIST

All organisations have a legal responsibility under the Modern Slavery Act to remove unacceptable practices and exploitation from their operations and supply chains. To tackle Modern Slavery, and ensure that supply chain partners work together responsibly, robust due diligence must be undertaken on an annual basis as a minimum. Use this template as a structured review of your current measures, and to record proactive steps being taken to reduce risk and eradicate Modern Slavery.

MITIGATING THE RISK

Company Strategy

ACTION	YES/NO		PLEASE DETAIL
Have you identified the high-risk areas for Modern Slavery within your supply chains?	Yes	No	
Have you developed a strategy of the steps you will need to take to prevent Modern Slavery within your own business and supply chains?	Yes	No	
Have you set objectives to monitor, measure and report Modern Slavery within your own business and supply chains?	Yes	No	
What will be your strategy for dealing with non-compliance within your own business or supply chains?	Yes	No	

Policies, Procedures and Processes

ACTION	YES/NO		PLEASE DETAIL
Do you have a Modern Slavery Policy and is it signed by the Board of Directors?	Yes	No	
Do you have an Anti-Bribery policy and is it signed by the Board of Directors?	Yes	No	
Do you have a Whistleblowing Policy and procedure in place which allows for suspicions to be raised concerning Modern Slavery practices without fear of retribution?	Yes	No	
Do you have a process for completing a workplace investigation if issues are raised? Do you know when it is appropriate to report your suspicions to the authorities?	Yes	No	

Director Responsibility

ACTION	YES/NO	PLEASE DETAIL
Have you appointed a senior individual to have responsibility for preventing Modern Slavery?	Yes No	
Has the individual had training in Modern Slavery prevention and their responsibilities?	Yes No	
Is the Board aware of their responsibilities with regard to Modern Slavery?	Yes No	

Third Party Agreements

ACTION	YES/NO	PLEASE DETAIL
Are you a signatory to any trade agreements on human rights, ethical trade and corporate social responsibility as part of a sector wide approach to tackling Modern Slavery?	Yes No	
Are you committed within a contractual agreement to undertake certain steps with regard to Modern Slavery prevention and detection?	Yes No	

Training and Development

ACTION	YES/NO	PLEASE DETAIL
Are colleagues appropriately trained on the signs of Modern Slavery, and what to do if suspicions arise?	Yes No	
Has the recruitment team had specific training in identifying the signs of Modern Slavery and their obligations?	Yes No	

Engagement

ACTION	YES/NO	PLEASE DETAIL
Have you engaged with your recognised trade unions or other industry bodies supporting the prevention of Modern Slavery?	Yes No	
Do you display posters providing information on Modern Slavery for staff and contractors in prominent places?	Yes No	
Have you publicised within your business your Modern Slavery policy and colleague responsibilities?	Yes No	

Workers Rights and Employee Welfare

ACTION	YES/NO		PLEASE DETAIL
	Yes	No	
Are you compliant with UK employment law?	Yes	No	
Do your line managers regularly engage with workers and create time for welfare issues to be discussed and investigated?	Yes	No	

Recruitment, Labour and Contractors

ACTION	YES/NO		PLEASE DETAIL
	Yes	No	
Do you ensure that all workers have provided documentation evidencing their right to work in the UK from List A or List B before they start employment (this may not be the same day as they start work)?	Yes	No	
Do you ensure that any external recruitment provider is not charging work finding fees within the contractual agreement?	Yes	No	
Do you ensure that your external recruitment providers are signed up to industry codes of conduct and demonstrate a commitment to good recruitment practices?	Yes	No	
Do you (or an appointed external audit service) conduct regular audits of suppliers to check that there are no signs of Modern Slavery?	Yes	No	
Do you ask contractors to provide evidence of their right to work in the UK?	Yes	No	
Do you set out your commitments to prevent Modern Slavery within those sub-contractor contracts?	Yes	No	

Indicators of Slavery

ACTION	YES/NO		PLEASE DETAIL
	Yes	No	
Do you check your records to identify any high levels of occupancy at a single address?	Yes	No	
Do you check your records to identify whether a number of unrelated people are using the same bank account number?	Yes	No	

Reporting

ACTION	YES/NO	PLEASE DETAIL
Do you have a confidential hotline where employees can report abuse?	Yes No	

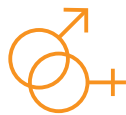
Records

ACTION	YES/NO	PLEASE DETAIL
Do you keep a record of suspected instances of Modern Slavery and have a process of escalation?	Yes No	

Audit

ACTION	YES/NO	PLEASE DETAIL
Do you regularly audit your own business processes to ensure they are effective?	Yes No	

MODERN SLAVERY INCLUDES



SEXUAL EXPLOITATION



CRIMINAL EXPLOITATION



FORCED LABOUR



DOMESTIC SERVITUDE

COMMON AREAS OF LABOUR EXPLOITATION



CONSTRUCTION



FOOD PROCESSING



FACTORIES



CAR WASH

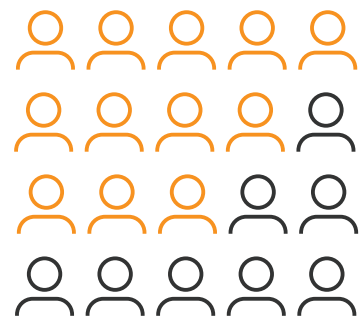


AGRICULTURE



TARMACKING

17% INCREASE IN VICTIMS SINCE 2015



Source: <https://www.gov.uk/>