Procurement

BACKGROUND

Modern Slavery (MS) is an abhorrent and often hidden crime. It includes slavery, servitude, forced and compulsory labour, and human trafficking. The impact is devastating for the victims, with many going undetected. The most common type is labour exploitation which is a risk to our business and supply chain.

To effectively tackle modern slavery, the UK Government Modern Slavery Act was introduced in 2015. This provided new offences and legislation to prevent slavery taking place, including specific reporting requirements for businesses with a turnover of £36 million or more. These include producing an annual statement setting out the steps a business has taken to ensure there is no modern slavery in their own business and their supply chains. Full details of this legislation can be found at here and there is also Home Office guidance to support on 'Transparency in Supply Chains' (TISC).

MWH Treatment are subject to this legislation and we publish a statement annually on our website. See documents here.

Policies Statements and Certificates

The statement outlines the steps we are taking to tackle modern slavery. Our approach is part of our wider commitment to be a responsible business. Engagement with our supply chain is key to tackling modern slavery and this guidance is to assist you to identify and address the risk within your operations and your supply chain.

THE BENEFITS OF UNDERSTANDING YOUR SUPPLY CHAIN

Modern slavery legislation provides a focus to consider wider supply chain issues. Under the United Nations Guiding Principles on Business and Human Rights all businesses have a responsibility to respect people's rights:

https://www.business-humanrights.org/en/un-guiding-principles

Clients and customers require assurance on where, and how their suppliers source their products and how employees are treated. Your supply chain is effectively our supply chain. Tackling modern slavery not only protects vulnerable workers and helps prevent human rights abuses it can bring many business benefits too, including:

- Managing risk by protecting and enhancing your business reputation and brand
- Demonstrating sound business practice and anticipating future legislative requirements
- Complementing existing tools and requirements (e.g. for health and safety, employment checks etc.) rather than developing something new
- Attracting more business as higher ethical standards are sought
- Improving staff retention by promoting values and respect
- Developing better relationships and building trust with your own supply chains.

GETTING STARTED

There are several simple things that you can do to demonstrate that you consider trafficking, slavery and wider practices, such as sustainability, in your supply chains in the context of your own business. This will give confidence to your customers / client that you are addressing this important issue:

1. Recognise Your Responsibility

All businesses have a responsibility to protect vulnerable workers in their own operations and those of their supply chain. If you are a business owner, or manager, recognising this and increasing awareness of the issue is a powerful first step.

2. Make a Commitment Responsibility

Make a policy commitment to ensure all work is conducted on a voluntary basis, not under threat of any kind. It can be simple but should establish in broad terms what you will do and how you will do it. This shows awareness and transparency.

3. Develop Actions

Due diligence and risk assessments around modern slavery are important. This need not be too burdensome. Think about risk in your supply chain which may, for example, be geographic or sector related. Consider what action you could take to monitor these, to track changes, log improvements, or review any new risks. Mapping your supply chain can be challenging but can help in managing your business relationships and internal / external processes. The Supply Chain Sustainability School provides a Modern Slavery Due Diligence Assessment, to help businesses understand their level of maturity in addressing modern slavery risks and provides resources and guidance.

4. Involve Your Staff

Everyone has a role to play in combating slavery and trafficking, and there are free resources to help you do this. Training all staff to understand modern slavery and recognise the signs helps to prevent it being encountered, through your own activities or within your supply chain. Depending on the risk, you may want to consider specialist training for staff (depending upon their job role). There are charities that offer training in this area, such as the Slave Free Alliance, Unseen and Stop the Traffik. The Supply Chain Sustainability School provide free training resources, including an operational toolkit for combatting modern slavery in the built environment. The toolkit aims to provide advice on how businesses can effectively combat slavery and labour exploitation.

5. Engage with your Own Supply Chain

Engaging honestly and openly with suppliers and subcontractors to address issues should be a priority. You should be able to challenge your own supply chain:

- Do they understand the issues?
- How can they help you create a more transparent supply chain?
- If there are issues can you work together to address and resolve them?

You may wish to update your terms and conditions of your business.

Footnote: This guidance has been adapted from the guidance produced by the Central Procurement Office at the University of Manchester. It was based on feedback from their existing SMEs and with expert advice from academics from the Alliance Manchester Business School who specialise in research in the are of human rights in the supply chain. Thank you to the University of Manchester for allowing us to use their document.

6. Develop a Simple Modern Slavery Statement

There is no standard format for producing a statement – it really depends on the size of the business and the business activities. However, it should be clear and informative. Larger businesses must produce a statement, but many smaller firms are also choosing to do so. The statement offers a chance to demonstrate that you look at your supply chains, that you understand the issues, have thought about them in relation to your own business and the business risk, and are willing to publicly commit to addressing any challenges identified.

Things to include (based on the Government guidance and the 6 criteria of the UK Modern Slavery Act 2015):

1) Organisation structure and supply chains: who you are
2) Policies: demonstrating your commitment to opposing slavery and human trafficking
3) Due diligence processes
4) Risk assessment and management: your assessment of the likelihood of slavery in your sector and supply chains
5) Effectiveness: how you measure your commitments and actions
6) Training: raising awareness

RESOURCES

There are a wide variety of resources covering slavery and supply chain transparency and many are accessible by searching the internet. Resources we have found useful are:

Supply Chain Sustainability School – guidance, YouTube videos and e-learning modules including an 'Operational Toolkit for Combatting Modern Slavery' https://www.supplychainschool.co.uk/

Fair Work Agency responsible for enforcing workers' rights: https://www.gov.uk/government/organisations/fair-work-agency/about

The Home Office provide guidance for supply chains – Transparency in Supply Chains (TISC) A Practice Guide

The Home Office provide training resources and a booklet: Resource page

Ethical Trading Initiative (ETI) information on standards, resources and initiatives: https://www.ethicaltrade.org/modern-slavery-resources

For further information from MWHT please contact: Procurement.Treatment@mwhtreatment.com