

The following good practice form a number of the steps an employer may take to ensure that slavery and human trafficking is not taking place in its own business and include in their statement for the Modern Slavery Act Transparency in Supply Chains reporting provisions.

Company Name

Site

Completer Name

Email

Date

/ /

Scoring System

0 – if not implemented/don't know, 1 – if partially implemented, 2 – if fully implemented, N/A if not applicable

Please answer ALL questions

A.	Management Systems Good Practice	Score
1.	The employer has developed and implemented a "Tackling Modern Slavery" policy, specific to its own business, which details the processes it will take to prevent forced labour and labour trafficking and the steps it will take should such practices be identified within its business.	
2.	The employer has appointed an individual at the most senior management level within the business to have responsibility for the human rights, ethical trade and corporate social responsibilities of the business including an explicit responsibility for preventing modern slavery.	
3.	Where the employer has formal workforce representation arrangements, it has consulted with and seeks to work collaboratively with trade union and/or employee representatives on its tackling modern slavery programme.	
4.	Employers should demonstrate good business practice in the due diligence checks carried out in the appointment of labour providers to establish their credibility and legitimacy.	
5.	Employers should only contract with formal labour providers with an identifiable and distinct legitimate business entity.	
6.	Employers should understand the legal operating conditions for labour providers in that country and sector and ensure that any system of licensing, certification or other regulation as required by national law and practice is properly complied with.	
7.	Where the employer uses a labour provider to source or supply workers into the UK food and agricultural sectors, then prior to using this labour provider, the employer confirms that this business holds a GLA licence and that the GLA Active Check facility is used.	
8.	The employer can demonstrate that its policy and practice is to commit managers and consultants, where appropriate, to work proactively and collaboratively with enforcement authorities including the police and GLA to assist in crime prevention and prosecution.	
9.	The employer can demonstrate that their anti-bribery and corruption policies are agreed, applied and complied with in arrangements with labour providers.	
10.	The employer can demonstrate that it has issued its managers, consultants and recruiters with written notification that accepting bribes or inducements to recruit or favour workers or to commit any form of physical or mental worker mistreatment, coercion, bullying or harassment is prohibited and will be investigated as a potential gross misconduct offence (See Appendix 3).	
11.	The employer can demonstrate that it has improving ethical labour standards as a fixed agenda item during progress meetings with its labour providers and reviews collaborative informal and formal approaches to identifying, deterring and tackling hidden labour exploitation.	
12.	The employer can demonstrate that: there is a formal written process for supervisors and workers to report and record suspected cases of labour trafficking, forced labour and other hidden labour exploitation; that supervisors and workers are aware of and use this process and; management deal with such reports appropriately.	
13.	Employer can demonstrate that they have informed the labour provider of the name of the senior manager within the employer who the labour provider can report to and deal confidentially with on matters of potential harassment and/or discriminatory, unreasonable or suspicious actions by the employer's supervisors.	
14.	The employer can demonstrate that no issues relating to trafficking or exploitation, have been highlighted in ethical audits conducted by social compliance audit bodies, or where they have been identified, even if recorded as an 'observation', they have been formally investigated and resolved.	
15.	The employer has in place a process for using independent interpreters or a telephone interpreting line for when it is necessary at short notice to conduct surveys, investigation interviews or complaints interviews.	

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16.	Employer has agreed with the labour provider a transparent and non-discriminatory agency worker temporary to permanent selection process which is effectively communicated to workers.	
17.	The employer can demonstrate that it regularly conducts audits to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout its business.	
18.	The employer can demonstrate that it has a written procedure with the labour provider for the allocation of available work to the pool of workers to be done in a fair and objective way that is communicated and understood by the agency workers. This should ensure that only nominated and suitably trained individuals have the authority to book agency workers; that the selection of workers to work on a particular shift/overtime is fair, transparent and non-discriminatory. It should rely on the labour user specifying the number of skills/roles required and not named individuals. It should avoid situations where workers congregate in the hope of work and employer supervisors pick from a crowd.	

B. Training to Build Capacity and Capability		Score
19.	The employer senior managers responsible for leading the organisation's/region's/site's "Tackling Modern Slavery" programme has attended training in recognising, preventing, and dealing with forced labour, labour trafficking and other hidden third party labour exploitation.	
20.	The employer' recruiters have undertaken training in recognising, preventing, and reporting forced labour, labour trafficking and other hidden third party labour exploitation.	
21.	The employer's supervisors have undertaken training in recognising, preventing, and reporting forced labour, labour trafficking and other hidden third party labour exploitation.	
22.	The employer's supervisors and managers are trained and instructed to whistleblow where they have a concern over another manager, supervisor, or labour provider consultant.	
23.	Employer has trained security staff to spot the signs that may indicate potential worker exploitation and how to report any concerns to appropriate managers.	
24.	The employer's induction training for new workers includes a section on how to recognise and report forced labour, labour trafficking and other hidden third party labour exploitation.	
25.	The employer has trained all existing workers on how to recognise and report forced labour, labour trafficking and other hidden third party labour exploitation.	

C. Labour Sourcing Good Practice		Score
26.	The employer has a written policy with words to the effect that the cost of recruitment is a business cost and that no fee or cost for recruitment will be charged to workers, directly or indirectly, in whole or in part.	
27.	Employer monitors and enforces with its labour provider and any labour sourcing agents that the labour provider uses that no fee for recruitment is charged to workers, directly or indirectly through the required purchase of goods or services.	
28.	Employer has discussed and agreed the labour sourcing methods and channels used by its labour provider. Employer is clear about the labour sourcing supply chain.	
29.	The employer can demonstrate that it has processes in place to prevent individuals, however seemingly well intentioned, to introduce significant numbers of workers for work (accepting that word of mouth introductions to close friends and family are likely to be harmless).	
30.	Employer has discussed and agreed the recruitment selection criteria and a fair and non-discriminatory process used by its labour provider.	

D. Recruitment Processes Good Practice		Score
31.	The employer can demonstrate that its recruiters are trained and instructed to report and record where a number of workseekers are introduced by a particular individual, usually of the same nationality, often with good English language skills. This individual may claim he is a friend, relative, uncle, cousin etc., or just helping out but speaks for the other individuals and controls the conversation and waits whilst the individuals are being interviewed.	
32.	The employer can demonstrate that its recruiters and consultants are trained and instructed to report and record where job application documents have been brought in by one individual on behalf of his "friends or family" and/or be in a better standard of English than the workseeker possesses and/or have been completed in the same handwriting.	
33.	The employer can demonstrate that recruitment of workers is only undertaken by recruiters who have been trained in the organisation's processes to recognise, prevent and report forced labour, labour trafficking and other hidden third party labour exploitation.	

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34.	The employer can demonstrate that during the worker selection process the recruiter asks and records: <ul style="list-style-type: none">• How the worker found out about the work• Whether the worker has paid anyone, or will have to pay anyone to obtain the work in question• Whether the worker has paid anyone to get to the UK if a newly arrived migrant.	
35.	The employer can demonstrate that any literacy, numeracy or other testing is conducted in a controlled environment with a format that is regularly changed to prevent coaching of individuals.	
36.	The employer can demonstrate that the recruitment process records a worker's landlord name and verifies a worker's address by asking to see a rent book or contract and that recruiters are trained and instructed to report and record where a workseeker states that they rent from a landlord who works for the labour provider or employer.	

E.	Worker Records Analysis to Alert Risks Good Practice	Score
37.	The employer systematically checks addresses of its workers and workseekers for high occupancy of particular houses and acts accordingly on the information.	
38.	The employer systematically checks bank accounts to identify unrelated workers paid into one account and acts accordingly on the information.	
39.	The employer systematically checks mobile phone numbers to identify seemingly unrelated workers who are contactable through one or sequential numbers and acts accordingly on the information.	
40.	The employer systematically checks documents for the same next of kin and/or same place of origin/location in home country and acts accordingly on the information.	
41.	The employer systematically checks emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number and acts accordingly on the information.	
42.	The employer systematically checks workers' landlord's names to determine if the landlord works for the employer or where many of the workers rent from one landlord and acts accordingly on the information.	
43.	The employer works in partnership with its labour providers to cross reference worker records information as detailed above and acts accordingly on the information.	
44.	Employer conducts formal re-checking of bank accounts; addresses; personal details etc. when agency workers move from temporary to permanent status.	

F.	Workplace Monitoring Good Practice	Score
45.	Employer directs CCTV cameras and Security Officers to areas where workers disembark from transport to work to monitor any potential suspicious activity.	
46.	The employer's supervisors and/or security officers are trained and instructed to monitor, record and report where workers are delivered and collected from work where such transport and the drivers raise cause for suspicion, such as the type of vehicle, the demeanour of the drivers and passengers.	
47.	The employer's supervisors are trained and instructed to monitor, record and report where agency and direct workers appear frightened, agitated or secretive; act as if they are instructed by another and/or look to another to speak on their behalf; reject help and support when offered.	
48.	The employer's supervisors are trained and instructed to monitor, record and report where agency and direct workers physical appearance may show signs of injury and malnourishment; their general appearance may be unkempt with inappropriate clothing; they may have few or no personal effects; little or no money for food.	
49.	The employer can demonstrate that its recruiters and consultants are trained and instructed to monitor, record and report where a group of workers (who may, live work and/or travel together) stop working suddenly for no particular reason.	
50.	Employer appoints trusted "Worker Welfare Officers" or "Integration Officers" who speak representative languages to gain the trust of fellow workers and come forward with information of workers experiencing difficulties.	

G.	Worker Engagement Good Practice	Score
51.	The employer can demonstrate that it has issued workers with a "Stronger Together" multi-language leaflet to raise awareness of how to recognise and report hidden exploitation. The employer may also signpost workers to the GLA's worker pages and worker rights leaflets.	
52.	The employer displays the "Stronger Together" posters on site noticeboards where they may be viewed by all workers.	

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53.	The employer can demonstrate that it encourages its supervisors and managers to regularly talk informally to workers to seek to gently uncover whether there are any experiencing issues such as harassment, coercion, bullying, control or exploitation.	
54.	The employer issues occasional confidential questionnaires to a sample of its workers through a variety of means i.e. email, post, group completion to identify potential worker exploitation (Appendix 6). This process should be conducted in a controlled environment to prevent any outside influence.	
55.	The employer uses independent NGOs, migrant worker support groups or other worker welfare organisation to speak to workers in their native language in supportive manner to identify if there are any issues.	
56.	Employer appoints trusted "Worker Welfare Officers" or "Integration Officers" who speak in workers' first languages to gain the trust of fellow workers and come forward with information of workers experiencing difficulties.	
57.	The employer has formal worker representation arrangements and engages with worker representatives or where these do not formally exist speaks with groups of workers to determine if there may be any issues with harassment, coercion, bullying, control or exploitation and to discuss whether there are any ways the labour provider can improve its processes or better engage with workers.	
58.	Employer conducts regular staff briefings with the topic of trafficking and forced labour on the agenda.	
59.	Employer and trade union and/or employee representatives have hidden labour exploitation as an agenda item during progress meetings and review collaborative informal and formal approaches to identifying, deterring and reporting this issue.	

H.	Providing Access to Remedy Good Practice	Score
60.	The employer can demonstrate that it has a complaints/grievance process in a comprehensible format which has been issued for retention by each worker and is operated fairly and in line with natural justice.	
61.	The employer has verified that its labour provider has a complaints/grievance process in a comprehensible format which has been issued for retention by each of its workers and is operated fairly and in line with natural justice.	
62.	The employer has a multi-language confidential helpline process through which issues can be raised confidentially by phone, email or in writing to either: The labour user workforce helpline; an independent specialist helpline service; a Senior Manager/HR who is separate to the direct supervision of the worker.	
63.	The employer can demonstrate that it has a whistleblowing procedure whereby supervisors and managers can confidentially raise issues of concern to a member of the senior team without fear of retribution.	

	Total	
	Total %	