



## Modern slavery statement checker

Points to check for when reviewing a suppliers modern slavery statement.



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## Modern slavery statement checker

As a responsible buyer, you'll want to be sure that your suppliers are taking the necessary steps to make their supply chains more transparent. You'll be checking that they've each published an annual **Slavery and Human Trafficking Statement** that is compliant with section 54 of the UK Modern Slavery Act 2015.

But would you know how to tell a **good** statement from a **bad** one?

The **Modern Slavery Statement Checker** identifies six signs of a good statement to look for, along with six more things that may suggest your supplier needs to improve. It's designed to help buyers and other stakeholders spot good practice in transparency reporting.

### Six good signs:

It's a **good sign** when a statement:

- ✓ Is up to date, signed and dated, clearly setting out what's been done during the last year and identifies those people in the organisation that are responsible for its supply chains;
- ✓ Recognises what specific risks exist in their supply chains and does not hide away from this reality;
- ✓ Explains the steps that have actually been taken within the organisation and with suppliers to prioritise and address the highest risks;
- ✓ Is specific about training for key staff that has been carried out, particularly on the signs of slavery and human trafficking to look for and what action staff should take;
- ✓ Demonstrates that the company knows what it will do to protect, remediate and compensate the victims if an instance of slavery or human trafficking is discovered; or
- ✓ Contains clear, deliverable actions for the coming year(s) to further mitigate risks identified, working with suppliers and collaborating with others.

### Six bad signs

It's a **bad sign** when a statement:

- ✗ Reproduces text from other entities' statements or clearly follows a template;
- ✗ Contains vague, void, and/or grand statements such as "We have a zero tolerance to slavery" or "our staff receive training";
- ✗ Refers to the statement as a "policy" rather than an annual statement, or it reads like a policy, unlikely to track progress from year to year;
- ✗ Shows a misunderstanding of the risks by either denying their existence or considering that they don't apply to their supply chains;

- ✘ Assumes that the responsibility lies on the organisation's suppliers and relies on what they say they do, for example "Our suppliers check workers' right to work in the UK" or just pass the responsibility on by stating, for example, "We put clauses in our contracts to ensure that our suppliers take action";  
or
- ✘ Fails to own the risks and responsibilities towards the organisation's supply chain and looks for easy ways out, such as declaring "We will terminate any relationship with a supplier that finds slavery in its supply chain."

### Authors



A results-driven procurement practitioner with over 30 years' experience in both public and private sectors and an advocate for promoting respect for human rights in public supply chains, was named in 2018 as one of the UK Top100 Corporate Modern Slavery Influencers' Index



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### Further reading

- *Protecting Human Rights in the Supply Chain. A Guide for Public Procurement Practitioners* (2017) by Olga Martin-Ortega and Andy Davies (CIPS).
- *Managing Risks Associated with Modern Slavery. A Good Practice Note for the Private Sector* (2019) by EIT and Ergon.
- *Modern Slavery Reporting: Weak and Notable Practice* (2017) by CORE, Anti-Slavery International, UNICEF and Business and Human Rights Resource Centre.
- *FTSE 100 at the Starting Line. An analysis of company statements under the UK Modern Slavery Act* (2017) by Business and Human Rights Resource Centre.
- *Preparing a Slavery and Human Trafficking Statement: Guidance for Higher Education* (2018) by Olga Martin-Ortega, Anna Gorna and Patrycja Krupinska (BHRE and HEPA).

