


A graphic consisting of a white dotted circle with a white diamond shape inside it. The text 'Modern Slavery Toolkit' is written in yellow inside the diamond.

Modern Slavery Toolkit

A graphic consisting of a large yellow circle with a white rectangle inside it. The text 'A guide and resources to ensure your co-op tackles modern slavery' is written in yellow inside the rectangle.

A guide and resources
to ensure your
co-op tackles
modern slavery

CO-OPERATIVES UK



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Modern Slavery is a crime and a violation of fundamental human rights. The International Labour Organisation estimates that there are 45.8 million victims of modern slavery worldwide, with potentially 13,000 victims living in the UK.

As responsible co-operative businesses and employers, it is important to take all practical steps to prevent and detect modern slavery.

The Modern Slavery Act 2015 introduced the requirement for any organisation selling goods and services, with a turnover of £36 million or more, to produce an annual statement confirming the steps it has taken to eradicate slavery and human trafficking within its business and supply chains. Smaller responsible organisations are also choosing to prepare their own modern slavery statement to evidence to their customers and members how they are tackling modern slavery. This is an opportunity to tell the public and staff what initiatives have been put in place.

1. What is modern slavery?

The Modern Slavery Act 2015 prohibits all forms of modern slavery.

Modern slavery is a term used to describe the criminal offences of slavery, servitude, forced or compulsory labour and human trafficking. Victims have their freedom restricted and are exploited for personal and/or financial gain.

Let's look at each of the offences in more detail:

Human Trafficking

Human trafficking is the process of arranging or facilitating the travel of another person with a view to exploitation. The offence can be committed even where the victim consents to travel; many victims believe they are being offered a better life. Exploitation could involve servitude, forced or compulsory labour, sexual exploitation, indecent images of children or commercial dealings in bodily organs.

The International Labour Organisation reports that human trafficking has an annual trade value of around US\$150 billion. Trafficking is not just about movement across international borders, it also includes transportation within a country for exploitation.

Slavery and Servitude

Before it became impossible to own another person, the term 'slavery' referred to legally owning another person, as if they were a physical possession. Today, someone may behave as if they legally own a person, denying them their right to freedom.

Servitude is similar to the offence of slavery, but the person is not owned. The victim may live on their employer's property, work for them and be unable to leave.

Forced or Compulsory Labour

Forced or compulsory labour means that someone is forced to do work that they have not agreed to, under threat of punishment. The individual could be controlled by a gang, their direct employer or an agency for commercial gain.

The individual may be in debt bondage. This is where a person is tied to their employer, working in poor conditions and for very little, or no pay, whilst they pay back an unreasonable or unattainable debt.

2. Prosecuted modern slavery perpetrators

People are often shocked to hear that modern slavery is happening in the UK. Here are some examples of where modern slavery has been hidden within the supply chains of some well-known British brands:



> A British company agreed to pay more than £1 million pounds to settle a modern slavery claim brought by a group of migrants who were trafficked to catch chickens on farms across the UK producing free range eggs for McDonald's, Tesco, Asda, M&S and Sainsbury's. The men were forced to work for less than minimum wage, were charged prohibited work-finding fees, had their wages withheld and were deprived of facilities to wash, rest, eat and drink. The retailers were unaware of modern slavery within the supply chain.



> Two men were jailed for six years for exploiting Polish workers. They identified their targets in Poland, before giving the victims coach tickets to the UK. They arranged work for the men with an agency who supplied Sports Direct with warehouse operatives. The workers were made to live in squalid conditions and were forced to release control of their bank accounts. Neither the agency nor Sports Direct had any involvement in the crime, but were unknowingly being served by workers in forced labour.



> The owner of the UK bed making business Kozee Sleep was convicted of conspiracy to traffic, and sentenced to 27 months in prison. Also convicted were two Hungarian gangmasters who supplied the Kozee Sleep factory with workers subjected to forced labour. The workers were detained in overcrowded, squalid conditions without freedom to travel and forced to work 10-16 hours a day, 7 days a week with little pay. The company supplied household names including Next Plc, John Lewis Partnership and Dunelm Mill. Despite audit processes, signs of modern slavery were missed.

3. Are businesses legally required to prevent modern slavery?

Modern Slavery Offences

It is an offence to commit any of the modern slavery offences detailed in the Modern Slavery Act 2015. You can find out more information [here](#). Perpetrators may be sentenced to life imprisonment. All proceeds from committing these crimes may be seized and used to compensate victims.

Road Transport into the UK

All road transport companies and their drivers are asked to secure their vehicles coming into the UK. This helps to combat both illegal entry into the UK and human trafficking. The vehicle driver, owner or hirer can be fined where they fail to carry out their responsibilities.

Modern Slavery Act 2015

Businesses are not obliged to prevent or eradicate modern slavery within their supply chains, or guarantee that their supply chains are slavery free. However, this is what many responsible businesses are working towards.

The Modern Slavery Act 2015 requires large co-operative businesses to produce and publish an annual statement setting out the steps taken to prevent modern slavery within their own business and supply chains. Many other co-operatives will choose to produce a statement setting out the steps taken by their business to eradicate modern slavery. For these businesses it is a good idea to produce a statement in the format provided in the legislation.



4. How do we produce and publish a modern slavery statement?

Which co-operatives are required to produce a modern slavery statement?

A co-operative business is required to produce a statement if it:

- > supplies goods or services
- > carries on a business (or part of a business) in the UK
- > has an annual turnover of £36 million or more (the turnover of the company combined with its subsidiary companies).

Turnover is the amount of money taken by a business during that year after deduction of trade discounts, VAT and any other taxes based on the amounts so derived.

A number of companies within a group structure may meet the threshold requirement to produce a statement in its own right. In this situation, the parent company can produce one modern slavery statement on behalf of the group, although it must refer to the steps taken by each qualifying company.

What steps will we need to include in our statement?

Your statement must confirm the steps taken during the previous financial year to prevent modern slavery and human trafficking within:

- > any part of your business
- > your supply chains.

What is meant by “our business”?

Your business includes your own workforce and business sites. It includes every part of your operations.

What is a “supply chain”?

A supply chain covers all the people and businesses involved in the process of bringing a service/product from inception through to the sale and delivery. Here are some examples:

- > A company providing raw materials or goods
- > A recruitment agency providing workers
- > Outsourced security services
- > Packing operations

What if we have taken no steps?

This must be confirmed within the statement.

What happens where our suppliers are non-UK companies?

Even though many of your suppliers will be operating outside of the UK, the Modern Slavery Act 2015 is concerned with how those suppliers are complying with the UK's laws on modern slavery. Part of your compliance process may include educating your suppliers about good working practices.

Are there any restrictions on format?

- > The statement must be in writing.
- > The statement must be written in English, but can also be produced in other languages.
- > The statement should be written in simple language.
- > It is not necessary to include the full policies and procedures within the statement. You may want to provide links to relevant documents and policies within the statement (e.g. a modern slavery policy).

What information should we include?

There is no requirement to write your statement using a particular methodology. However, the Home Office suggests that statements include the following information:

- > Details of the organisation's structure, business and supply chain
- > Policies relating to slavery and human trafficking
- > Due diligence processes
- > Methodology for identifying areas of risk within the business and supply chains
- > What steps have been taken to manage that risk
- > Effectiveness of actions
- > Training available to staff.

It is a good idea to look at how other companies have written their statement and follow examples that best fit your business model. Many use infographics to explain how their business operates. It is a good idea to involve your PR department.

In your first statement it may be that you briefly outline areas where your organisation is working to make improvements, and provide a fuller response in forthcoming years.

When do we need to publish our statement?

Your co-operative will need to produce and publish a statement annually.

The Government recommends that the statement is published as soon as reasonably practicable after the end of each financial year. In practice, the expectation is that each organisation will publish their statement within 6 months of financial year end.

The first businesses required to publish a statement were those with a financial year end date of 31 March 2016. Many businesses will be looking at publishing their first statement in 2017.

Who must authorise the statement?

The finished statement must be:

- > approved by the board of directors and,
- > signed by a director.

THIS IS A VERY IMPORTANT STEP WHICH IS OFTEN FORGOTTEN

Where does the statement need to be published?

The statement must be published on your co-operative's website. The website's home page must include a link to the statement in a prominent place. Many businesses include a hyperlink titled 'modern slavery statement' in the footer of their home page, which links to their social responsibility webpage displaying a copy of the statement.

If there is more than one relevant website relating to UK activities, a link should be placed on each UK website.

What are the penalties for failing to produce a statement?

The Secretary of State can obtain an injunction requiring a non-compliant company to produce a statement, any further failure is punishable with an unlimited fine. This route is likely to be rare, but not impossible.

The eradication of modern slavery within UK businesses is a priority for the current government and is a highly publicised topic in the news and press. The UK has an Independent Anti-Slavery Commissioner whose role is to encourage good practice in the prevention, detection, investigation and prosecution of slavery and human trafficking offences, and in the identification of the victims of those offences. Should your company fail to comply with the requirements of the Modern Slavery Act 2015, it could be highlighted as an example of corporate non-compliance.



As responsible co-operative businesses and employers, it is important to take all practical steps to prevent and detect modern slavery throughout the supply chain

5. Examples, tools and templates

For further assistance, you can contact HR Services at Co-operatives UK.

For more information about the team, visit: www.uk.coop/meet-hr-services-team-0.

Meanwhile, the following pages contain examples, tools and templates that will help you get started.

You can also download Word versions of the templates at: www.uk.coop/modernslavery.

In this section:

- a. Checklist and audit tool
- b. Risk area map
- c. Signs of modern slavery
- d. Template: Letter for suppliers
- e. Template: Letter for small suppliers
- f. Template: modern slavery statement
- g. Model recruitment policy
- h. Model anti-slavery policy
- i. Useful resources

All the resources and templates in this toolkit can be downloaded from www.uk.coop/modernslavery

5a. Checklist and Audit Tool

STEPS TO TAKE:		Completed ✓
COMPANY STRATEGY		
1.	Have you identified the high risk areas for modern slavery within your supply chains and business using the 'Identify your Risk Area' tool?	
2.	Have you developed a strategy of the steps you will take to prevent modern slavery within your own business and supply chains in 6, 12 and 24 months?	
3.	How will you measure how your organisation is performing against its objectives?	
4.	What will be your strategy for dealing with non-compliance within the supply chain?	
POLICIES, PROCEDURES AND PROCESSES		
5.	Do you have a Modern Slavery Policy?	
6.	Do you have an Anti-Bribery policy in place?	
7.	Have you checked your existing policies to ensure they are consistent with your Modern Slavery Policy and strategy?	
8.	Do you have a whistleblowing procedure in place which allows for suspicions to be raised concerning modern slavery practices without fear of retribution?	
9.	Is your grievance procedure accessible and easy to understand?	
10.	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?	
DIRECTOR RESPONSIBILITY		
11.	Have you appointed a senior individual to have responsibility for preventing modern slavery?	
12.	Has that person had training in modern slavery prevention and their responsibilities?	
13.	Is the Board aware of their responsibilities with regard to modern slavery?	

[Continues >>>]

THIRD PARTY AGREEMENTS		
14.	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?	
15.	Are you committed within a contractual agreement to undertake certain steps with regard to modern slavery prevention and detection?	
TRAINING AND DEVELOPMENT		
16	Are colleagues appropriately trained on the signs of modern slavery, and what to do if suspicions arise?	
17.	Has the recruitment team had specific training in identifying the signs of modern slavery and their obligations?	
18.	Have security staff had training on identifying the signs of modern slavery?	
ENGAGEMENT		
19.	Have you engaged with your recognised trade unions?	
20.	Have you engaged with your professional or industry bodies or registered charities supporting the prevention of modern slavery?	
MODERN SLAVERY STATEMENT		
21.	Draft a statement within 6 months of financial year end.	
22.	Outline the steps taken this year and commitments for next year.	
23.	Liaise with PR.	
24.	Get Board and Director sign off.	
25.	Liaise with your website administrator to ensure there is a link on your website Home Page linking to a copy of the statement.	

PREVENTING MODERN SLAVERY WITHIN YOUR BUSINESS:		Completed ✓
A	WORKERS' RIGHTS AND EMPLOYEE WELFARE	
26.	Do you work with a trade union body to ensure the proper treatment of workers?	
27.	Are you compliant with UK employment law?	
28.	Do your line managers regularly engage with workers and create time for welfare issues to be discussed and investigated?	
B	RECRUITMENT	
29.	Do you ensure that all the proper recruitment processes are followed even where you have colleague introductions?	
30.	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)?	
C	REPORTING	
31.	Do you have a confidential hotline where employees can report abuse?	
D	CONTRACTORS	
32.	Do you ask contractors to provide evidence of their right to work in the UK?	
33.	Do you set out your commitments to prevent modern slavery within those contracts?	
E	COLLEAGUE AWARENESS	
34.	Do you display posters providing information on modern slavery for staff and contractors in prominent places?	
35.	Have you publicised within your business your modern slavery policy and colleague responsibilities?	
F	INDICATORS OF SLAVERY	
36.	Do you check your records to identify any high levels of occupancy at a single address?	
37.	Do you check your records to identify whether a number of unrelated people are using the same bank account number?	

[Continues >>>]

G	RECORDS	
38	Do you keep a record of suspected instances of modern slavery and have a process of escalation?	
H	AUDIT	
39	Do you regularly audit your own business processes to ensure their effectiveness?	
PREVENTING MODERN SLAVERY WITHIN YOUR SUPPLY CHAINS		Completed ✓
A	SUPPLY CHAINS	
40.	Do you have a satisfactory level of supply chain visibility?	
41.	Are your suppliers registered with a third party which completes checks before engagement?	
42.	Are your suppliers asked to evidence their commitment to preventing modern slavery? Do you do this by letter or within the contract?	
43.	Do you educate smaller suppliers about their responsibilities to prevent modern slavery?	
B	LABOUR PROVIDERS	
44.	Do you ensure that any external recruitment provider is not charging work finding fees within the contractual agreement?	
45.	Do you ensure that your external recruitment providers are signed up to industry codes of practices and demonstrate a commitment to good recruitment practices?	
46.	If you use a labour provider to source or supply workers into the UK food and agricultural sectors, have you confirmed that the business holds a GLA licence and that the GLA Active Check is used?	
C	AUDIT	
47.	Do you (or an appointed external audit service) regularly conduct audits of suppliers to check that signs of modern slavery are detected and employee welfare monitored?	

5b. Risk area map

Identify Your Business Risk Areas

The following information can be used to identify high risk areas within your business. These are only some of the indications of slavery, and your co-operative should consider whether other risk indicators may be applicable.

Do you provide services or products in any of these industries?

Industry	Yes ✓
Agriculture	
Construction and tarmacking	
Fishing	
Restaurant and bar sector	
Manufacturing and factories	
Car washing	
Food processing	

Certain industries are indicated as high risk areas for modern slavery because they involve high levels of low paid, dangerous or temporary work. You can find out more information at www.gov.uk.

Do you supply or purchase any of these goods or raw materials?

Product	Yes ✓	Product	Yes ✓	Product	Yes ✓
Cotton		Garments		Embroidery	
Bricks		Sugarcane		Rice	
Cattle		Shrimp		Corn	
Gold		Footwear		Diamonds	
Coal		Brazil nuts		Timber	
Stones		Rubber		Gravel	
Carpets		Tobacco		Cocoa	
Coffee		Fireworks			

Many of the products we buy and use every day were made by people in slavery. This list of high risk products and raw materials has been prepared by Anti-Slavery International www.antislavery.org. The Fairtrade certification is the best available guarantee that a product has not been produced using forced labour.

[Continues >>>]

Do you purchase goods produced in any of these countries?

Country	Yes ✓	Country	Yes ✓
India		North Korea	
China		Russia	
Pakistan		Nigeria	
Bangladesh		Democratic Republic of the Congo	
Uzbekistan		Indonesia	

The Global Slavery Index has indicated these countries as having the highest number victims of modern slavery worldwide www.globalslaveryindex.org.

Does your workforce include any of these categories of workers?

Type of worker	Yes ✓
Agency workers	
Migrant workers	
Children	
Temporary workers	

The risk of modern slavery increases where work is temporary, low skilled or high risk.

5c. Signs of modern slavery

APPEARANCE

- Is the worker wearing inappropriate clothing for their job?
- Does the worker seem to have noticeably poor personal hygiene?
- Is the worker fearful or unwilling to engage with your organisation?
- Does the worker have few personal possessions and often wear the same clothes?

IDENTITY AND LEGAL DOCUMENTS

- Does the worker appear in possession of their own identity documents?
- Are the identity documents provided genuine?

WAGES AND FINANCES

- Does the worker use a bank account which is also used by other workers?
- Are the bank details in their name?
- Do they appear to have access to their money?

HEALTH

- Does the person have old or serious untreated injuries?
- Do they appear in poor health?
- Do they appear reluctant to speak about how the injuries were caused?
- Does the person look malnourished?

BEHAVIOUR

- Is the worker withdrawn or appears frightened?
- Does the worker avoid answering questions?
- Does someone speak on their behalf?
- Is the information they provide inconsistent?
- Do they appear to be under the control of another person?

ADDRESS

- Do they know where they live?
- Do they arrive with other workers, perhaps at strange times?
- Do they share the same address as other workers?

FEAR OF AUTHORITIES

- Does the person seem afraid of you helping them or contacting the authorities?

5d. Template: Modern slavery letter 1 [for suppliers]

[COMPANY LOGO]

[COMPANY ADDRESS]

Dear Sirs,

Modern Slavery Act 2015

Our business is committed to ensuring our business and supply chains are free of modern slavery. As part of this commitment, we are writing to all of our suppliers asking them to confirm the steps they are taking to ensure that their supply chains are slavery free and to provide their commitment to establishing a modern slavery free business and supply chain.

If you are uncertain how modern slavery impacts your business, you can find out more information at www.gov.uk.

We would be grateful if you could reply to confirm your commitment to creating a modern slavery free business and supply chain, and provide details of the steps that your organisation is taking to achieve this aim. We may audit your business to ensure that you are complying with your commitments [OPTIONAL and may terminate our relationship with you should we find a breach].

I look forward to receiving your response by [].

Yours faithfully,

[COMPANY NAME]

5e. Template: Modern slavery letter 2 [for small suppliers]

[COMPANY LOGO]

[COMPANY ADDRESS]

Dear Sirs,

Modern Slavery Act 2015

Our business is committed to ensuring our business and supply chains are free of modern slavery. As part of this commitment, we are writing to all of our suppliers asking them to confirm the steps they are taking to ensure that their supply chains are slavery free and to provide their commitment to establishing a modern slavery free business and supply chain.

What is modern slavery?

Modern Slavery is a crime and a violation of fundamental human rights. The International Labour Organisation estimates that there are 45.8 million victims of modern slavery worldwide, with potentially 13,000 victims living in the UK. Modern slavery is a term used to describe the criminal offences of slavery, servitude, forced or compulsory labour and human trafficking. All of these offences involve restricting a person's freedom, whilst exploiting them for personal or financial gain. If you are uncertain of your obligations, or want to know more about preventing modern slavery, you can find out more information at www.gov.uk.

What do we need you to do?

Please can you return the attached document, setting out the ways that your organisation is preventing modern slavery within your business and supply chains, and confirm your commitment to creating a modern slavery free business. We may also audit your business to ensure that you are complying with your commitments [OPTIONAL and may terminate our relationship with you should we find a breach].

I look forward to receiving your response by [].

Yours faithfully,

[COMPANY NAME]

[Continues >>>]

[SUGGESTED RETURN FORM – AMEND TO FIT YOUR BUSINESS AND REQUIREMENTS]

Dear Sirs

We confirm that our business is committed to preventing modern slavery both within our business and its supply chains. We understand that modern slavery refers to the illegal practices of slavery, servitude, forced or compulsory labour and human trafficking.

We confirm that we are taking the steps below to prevent slavery within our business and supply chains:

[INSERT STEPS]

We understand that we may be audited at any time and compliance with modern slavery commitments is essential to the relationship we have with your company.

Yours faithfully,

[NAME]
[POSITION]
[BUSINESS]

5f. Template: Modern slavery statement

Modern slavery statement for financial year 2015/16

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that [organisation] has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. [Organisation] has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

[Insert brief description of business and where it operates. Include sector, any international operations, and number of suppliers.]

Our high risk areas

[Insert brief description of the areas of the business that you consider to be high risk, how you have identified these, and any additional steps that you are taking to mitigate the risk in these areas.]

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

[Insert here brief description of relevant policies, for example:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.]

[Continues >>>]

Our suppliers

[Organisation] operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

[Insert here any relevant contract clauses, for example:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

[Insert here any relevant performance indicators, for example

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.]

Approval for this statement

This statement was approved by the Board of Directors on [date]

Name (Director)

Signature

Date

5g. Model Recruitment policy

1. We are committed to having a workforce that represents a variety of backgrounds and cultures and that can provide the relevant knowledge, abilities and skills for our organisation.
2. We exercise good recruitment practice and apply this equally to temporary, contract, interim, fixed term, zero hours and part-time workers. We will ensure that the best candidate for each post is appointed, based on objective criteria. All candidates will be given the opportunity to demonstrate their skills, knowledge and abilities against the person specification.
4. We are committed to promoting equal opportunities for all and will not discriminate against applicants on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race and religion or belief, sex or sexual orientation at any stage of the recruitment process. We offer flexible working arrangements and adaptive working practices wherever possible as a way of boosting inclusion and attracting talent.
5. We encourage the recruitment of disabled staff. Reasonable adjustments will be made at all stages of the recruitment process to facilitate a disabled candidate participating fully in the process, and in order for that person to undertake the post.
6. All of our staff managing and delivering the recruitment process, (whether internal staff or external providers) work to recognised standards, undertake any relevant training/qualifications and commit to continuous development.
7. Our business has a zero-tolerance approach to modern slavery and human trafficking taking place within our business or supply chains. Our external recruitment providers are expected to share the same commitment and provide evidence of the steps taken to achieve that aim. All our external recruitment providers are signed up to industry codes of practices and demonstrate a commitment to good recruitment practice. Our supply chain delivers good recruitment practice throughout, including where different resourcing models, such as recruitment process outsourcing or vendor arrangements, are in place.
8. Offers of employment are subject to pre-employment checks. The checks required will be dependent on the role that is advertised, and whether the applicant is an external or internal applicant. Necessary checks may include Disclosure and Barring Service checks where the role involves work with children, young people, vulnerable adults and financial data.
9. As an employer, we have a responsibility to prevent illegal working by ensuring that our employees have the right to work in the UK. In accordance with the Immigration, Asylum and Nationality Act 2006, all of our staff must satisfactorily evidence their right to work in the UK by providing a document or document combination from the acceptable document list (List A and List B) before they begin employment.
10. All applications will be treated confidentially in accordance with the Data Protection Act 1998. All personal information provided by candidates will be treated as confidential.
11. This policy will be reviewed regularly to ensure that it reflects best practice and to ensure compliance with employment legislation.

5h. Model Anti-Slavery Policy

1.0 Introduction

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. This policy explains the Co-operatives UK approach to modern slavery and sets out what you should do if you believe that any form of modern slavery is taking place within our business or supply chain. This policy applies to all individuals working for Co-operatives UK in any form, including agency workers, volunteers or contractors.

2.0 Our policy

Co-operatives UK has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. We accept that we have a responsibility to ensure, through our due diligence processes and so far as is possible, that workers are not being exploited, that they are safe and that relevant employment, health and safety, and human rights laws and standards are being adhered to, including freedom of movement and communication. If we believe that these rules are not being adhered to, we will notify the relevant authorities.

The prevention, detection and reporting of modern slavery in any part of Co-operatives UK's business or supply chain, whether in the UK or abroad, is the responsibility of everyone working for Co-operatives UK. You must avoid any activity that may lead to a breach of this policy and should report any concerns immediately under the reporting procedure below.

3.0 The procedure to follow

If you believe or suspect that a breach of this policy has occurred, is occurring, or may be about to occur, you must report it either by speaking to your manager or by following the whistleblowing policy. You should raise any concerns that you have as soon as possible, provided that it is safe to do so. If you are unsure about whether a particular act, the treatment of workers, or their working conditions constitutes modern slavery, please raise it with your line manager. You can also call the Modern Slavery Helpline for advice and guidance on 0800 0121 700.

Co-operatives UK encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. You will not suffer any detrimental treatment as a result of reporting in good faith a suspicion that modern slavery is taking place in any part of the business or our supply chain.

MARCH 2016

5i. Useful resources

Anti Slavery International

www.antislavery.org

Anti-Slavery International Products of Slavery Website

www.productsofslavery.org

Barnardos

www.barnardos.org.uk

CORE

corporate-responsibility.org

Gangmasters and Licensing Authority

gla.defra.gov.uk

Global Slavery Index

www.globalslaveryindex.org

Government Fact Sheets and Posters

www.gov.uk/government/publications/modern-slavery-industry-factsheets

Independent Anti-Slavery Commissioner

www.antislaverycommissioner.co.uk

Recruitment and Employment Confederation

www.rec.uk.com/news-and-policy/press-releases/recruitment-industry-worth-more-to-uk-economy-than-ever-before

Sedex Audit Tools

www.sedexglobal.com/modern-slavery-act-briefing/

Stronger Together

stronger2gether.org

Verite Fair Hiring Toolkit

helpwanted.verite.org/helpwanted

Walk Free Tackling Modern Slavery in Supply Chains

www.walkfreefoundation.org

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