

POSITION STATEMENT ON MODERN SLAVERY BILL

The Ethical Trading Initiative (ETI), as a leading alliance of companies, trade unions and NGOs, welcomes the introduction of the draft Modern Slavery Bill and the opportunity it provides to improve the UK's response to trafficking and modern slavery. We want to assure the Government, the public and our partners of our clear commitment to address and help eradicate modern slavery.

We strongly believe that the Modern Slavery Bill presents the UK with the opportunity to be a global leader in the fight to end abuse and exploitation of workers in supply chains. We believe this could give our members and partners a stronger platform to promote ethical trade and prevent slavery in supply chains, within the UK and globally, if we can confidently assert that we are doing everything we can to address this problem in our 'own back yard'.

Below are the recommendations that represent the views of most of our members:

- 1. We do not believe that voluntary initiatives alone will be enough to ensure that all companies take the necessary steps to eradicate slavery from their supply chains.** In line with recommendations from the Joint Committee on the Modern Slavery Bill, voluntary codes of conduct and social compliance programmes are helpful but inadequate to tackle the problem. We believe the legislation should include provisions to address modern slavery in supply chains.
- 2. Legislation is needed to provide a regulatory framework that levels the playing field for all UK companies with specific provisions on supply chains.** We maintain that there is a critical role for government in ensuring coherence across all relevant government legislation that deals with worker exploitation and slavery including: criminal justice, labour standards, inspection and enforcement; private sector regulation; business and human rights and relevant binding international instruments.
- 3. We would like to see specific reference in the legislation to internationally agreed definitions and UK's existing legal obligations and mechanisms for tackling forced labour and trafficking that are relevant to modern slavery,** particularly International Labour Organisation (ILO) Convention 29 and the newly adopted Protocol on Forced Labour, the UN Palermo Protocol on Trafficking, and EU Directives on Trafficking and Human Rights.

4. **We believe that greater transparency in identifying and reporting slavery in global supply chains will drive change. All companies should be required to demonstrate due diligence in their supply chains.** We believe this is an effective way for companies and procurement bodies to identify, assess and mitigate risks of modern slavery in their supply chains. This should enable more effort to be focused on tackling the problem. Government could foster a climate of open and transparent reporting by providing clear practical guidance to all companies to help them meet their statutory obligations. This should apply to all companies, including privately held businesses (listed and unlisted), small and medium enterprises (SMEs) and public procurement bodies.
5. **We strongly support the appointment of an independent Anti-Slavery Commissioner, with oversight of all government departments, relevant authorities and agencies, to hold government to account.** We would like the legislation to identify relevant laws and policies, roles and responsibilities for each department and see a critical role for the Anti-Slavery Commissioner to monitor and ensure enforcement where necessary.
6. The Gangmasters Licensing Authority (GLA) is an example of an effective body that UK industry helped establish to manage and mitigate risks of slavery in the food and agriculture sector. **We support a review of the role and remit of the GLA – which would include extending its investigative powers into other high-risk areas, such as construction, cleaning, care and hospitality. At the same time, we are clear that there should be no change to its existing licensing remit or reduction in capacity to investigate and take necessary action in food and agriculture sectors.** We would recommend a joint task force is convened as soon as possible with representatives of industry, trade unions, NGOs and government and stand ready to assist with this.
7. **The Modern Slavery Bill should extend legislative requirements to public procurement supply chains.** This will clearly demonstrate the UK Government's leadership and commitment in practice on modern slavery. More importantly, the magnitude of scale and investment in publicly procured goods and services will help industry drive sector-wide change.
8. **Government departments with international presence, particularly the Foreign and Commonwealth Office (FCO) and Department for International Development (DFID), can play a significant role in helping UK industry tackle modern slavery in global supply chains.** We would like to see the FCO and DFID take a more active role in bilateral and international engagement in areas related to human rights, governance, regulation and enforcement.

This should include provisions for better protection of vulnerable and marginalised workers that are most at risk of slavery.

9. **Access to redress and compensation for workers that are victims of trafficking and slavery must be adequately resourced.** This should include provisions under the National Referral Mechanism, adequate victim protection support (including for families of victims), access to justice, swift prosecution and financial compensation.
10. **Comprehensive prevention and protection strategies need to be in place to tackle modern slavery in the long-term.** Government could help to improve awareness and understanding of modern slavery by disseminating existing guidance and resources and sharing good practice. The voice and needs of workers and victims themselves should be at the heart of an effective response to modern slavery.