

29 August 2014

Rt Hon David Cameron MP  
10 Downing Street  
London  
SW1A 2AA

Dear Prime Minister,

We welcome the introduction of the Modern Slavery Bill and the UK Government's commitment to eradicate the abuse and exploitation of workers, both in this country and globally. We congratulate your government in its ambition to be a global leader on this issue.

Evidence and awareness of modern slavery is growing, and is one of the worst human rights violations that persist today. We know that it is a complex problem that is often most prevalent in lower tiers of supply chains, where visibility and leverage for change is challenging.

The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Our membership includes over 80 large brands and retailers with a combined annual turnover of more than £180 billion, as well as the major global trade union federations, the TUC and large NGOs such as Anti Slavery International. The British Retail Consortium is the lead trade association for the entire retail industry. Many of our members are at the forefront of voluntary initiatives to eradicate slavery in supply chains.

This letter represents the views of ETI and BRC member companies and organisations, amongst whose logos appear below. The following are some changes we would like to see in the Modern Slavery Bill that could help us make further progress.

First, we would like to see a clause in the Bill that calls for **transparency in supply chains**. We believe smart legislation that requires all companies to be transparent about the steps they are taking to address modern slavery and child labour in their supply chains can help drive stronger and broader efforts to end abuse and exploitation of workers in supply chains. It would do this by ensuring companies would have to consider their policies and make public the steps they are taking to tackle modern slavery. This could create positive competition to improve practices.

The legislation would *not* require companies to take any specific action to combat slavery within their business, however it would require businesses to provide an accurate picture of the measures that they are using to address risks in their supply chain.

Second, 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 would like to see this model extended to other high-risk areas such as fisheries, apparel, construction, cleaning, care and hospitality.

Voluntary initiatives and partnerships can achieve vital progress in improving standards and tackling modern slavery. But effective and strong regulation can ensure such change occurs across industries, not just in the supply chains of responsible companies. In the food and agriculture sector where there is an effective licensing, investigation and enforcement system by the GLA, there are far fewer cases of modern slavery and where it is found, there are clear mechanisms to address it. In other sectors, the risks of modern slavery are high and the problem is growing.

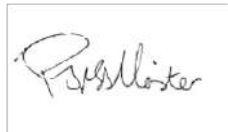
It should also be noted that our members do not have the power - nor is it their remit - to investigate, prosecute and ensure appropriate legal protection for victims of forced labour. We know we can and must continue to do more to prevent modern slavery, and the media and the public demand that we do this. But we can do so more effectively where clear, well-designed regulation and appropriate cross-departmental support is in place.

Third, alongside our own efforts to take responsibility for policies and actions on modern slavery in our global supply chains, we would like you to assure us that there will be an **independent Anti-Slavery Commissioner** with appropriate power to monitor the legislation, ensure compliance and take action where necessary. He/she should have oversight of all government departments, relevant authorities and agencies and hold them to account in protecting citizens and workers from modern slavery with remediation and support to victims. It is also important that the Commissioner should be able to determine his/her programme of work.

We strongly believe effective partnerships between government, the private sector, civil society and trade unions are critical – each playing their part with clear roles, responsibilities and accountability for identifying and acting on the problem. We stand ready to work with you to ensure the Modern Slavery Bill sets a global example that others can follow.

Yours faithfully,

Peter McAllister  
CEO Ethical Trading Initiative (on behalf of the majority of our tripartite members)



Helen Dickinson  
Director General BRC (on behalf of a number of our member companies)





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Rt Hon. Vince Cable, MP, Secretary of State for Business, Innovation and Skills  
Rt Hon. Mike Penning, Minister of State for the Home Office  
Karen Bradley, MP, Home Office Minister for Modern Slavery  
Jo Swinson, MP, Minister for Employment Relations and Consumer Affairs  
Frank Field, MP



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