

Procurement Newsletter

August 2021

- Modern Slavery & Human Trafficking
- Practical Steps
- Useful Resources



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We are the Post Office and there is no-one like us. From our travel and financial services, passports to postage, the Post Office network is serving communities across the UK. We have a network of more than 11,500 branches across the UK and every one of our branches is at the heart of its community.

We have introduced a series of quarterly newsletters to our Supplier partners to:

- Raise awareness of our values and the subjects that matter to us.
- Provide news, information and training that will help you to do business with us.
- Help you find opportunities to work with us as we grow and change for the future.

Modern Slavery and Human Trafficking

Post Office is committed to acting ethically and with integrity in all our business dealings and relationships. We want to ensure that modern slavery is not taking place anywhere in our own business or our supply chains. We have summarised below what is meant by Modern Slavery and Human Trafficking and given some practical steps that can be undertaken together with some useful resources to review.

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an "employer", usually through mental or physical abuse
- Dehumanised, treated as a commodity or sold or bought as "property"
- Physically constrained or has restrictions placed on their freedom of movement

We may hear of Human Trafficking in the news in relation to people who have been transported to the UK or another country by force, threat, or deception; but it is important to recognise that it also applies to movement within a country too. Trafficking applies to the transportation (or movement under coercion or deception) of people in order to benefit from their work or services, typically in the form of forced labour or sexual exploitation.

Products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product.

Services delivered in this country are at risk from abuse of the labour used to deliver it, particularly from the use of casual and temporary staff. However, good employment practices that follow correct recruitment and wage practises can reduce the risk of exploitation of workers. There are several authorities including the Police, National Crime Agency (NCA), Immigration service or Gangmasters and Labour Abuse Authority (GLAA) that can investigate workplaces and also use civil courts to impose civil orders to impose conditions designed to prevent offences.

For Services delivered overseas it can be very difficult to certify that employment practises are to the standard that we would consider acceptable, but effective management of overseas supply chain partners can reduce the risk of slavery being present. There are several organisations who can assist in auditing overseas suppliers and provide information on risk in specific regions.

Practical Steps

The Modern Slavery Act gives responsibility to companies for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

For large organisations there are often dedicated staff to cover a wide range of corporate social responsibility issues, but for smaller enterprises it can be a challenge to know how to respond effectively with a limited capacity on time and resource.

So, what practical steps can companies of all sizes take?

Section 54 of the Modern Slavery Act 2015 only requires companies to produce an annual Modern Slavery statement if they provide goods and services, and also have a turnover of more than £36m. In practise, the trickle-down effect of the Act is that businesses are asking more searching questions of their suppliers to seek assurance that they are also taking steps to ensure that their supply chains are free from slavery.

Having a Modern Slavery statement is good practise and it is something that a company of any size can create. Not all companies require a distinct Modern Slavery policy, but all companies should have clear employment policies and a way for staff to raise concerns

There are also other steps you can take:

- Ensure all UK workers receive minimum wage and robust immigration checks
 - Pay close attention to staff employed by agencies or subcontractors
 - Check that bank account details provided actually belong to the person employed
 - Check staff IDs to ensure that workers are not being substituted, especially for night shifts and remote workers.
- Identify where there is highest risk and exposure to modern slavery in your supply chains
 - Ask questions and seek assurances on how your suppliers manage these risks
 - Use the resources below to see what you can do to reduce the risk
- Undertake site inspections of your own premises and those of your highest risk suppliers
 - Use the resources below to find toolkits and practical guidance.
 - For international supply chains there are organisations that can assist.
- Provide training to employees and suppliers on modern slavery risks and compliance.
 - Would they know what to look for?
 - Would they know what to do if they had concerns to report?
 - Create a whistleblowing policy so that staff and suppliers can raise concerns confidentially and without fear of retaliation or detriment.
- Review supplier contracts to include obligations to comply with the Modern Slavery Act 2015
 - Understand what level of awareness and understanding your suppliers have on this issue
 - Determine what information you need to be assured that they are managing their operations and suppliers.
 - Review the ways you manage your contracts to ask questions and seek evidence of compliance.

Useful Resources

UK Government

UK Government Modern Slavery advice <https://www.gov.uk/government/collections/modern-slavery>

UK Government statement registry <https://modern-slavery-statement-registry.service.gov.uk/search>

How to publish a statement <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>

Stopping Modern Slavery In business <https://www.youtube.com/watch?v=QBHPM72pZeg>

Industry Factsheets and posters <https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>

Leaflet on support for victims in 11 languages <https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>

Other organisations

Gangmasters & Labour Abuse Authority are actively engaged in the fight to protect vulnerable and exploited workers. They have excellent resources and advice. They also use social media to share news of the actions taken. <https://www.gla.gov.uk/>

Unseen is an organisation that works with communities, business and government <https://www.unseenuk.org/about>

Helpline cards in multiple languages <https://www.modernslaveryhelpline.org/media/appeals>

Posters, toolkits and videos in multiple languages <https://www.stronger2gether.org/resources/>

Who do I contact for help?

Please read the guidance on our website <http://corporate.postoffice.co.uk/our-suppliers>

If you require any further advice, please contact procurement@postoffice.co.uk

