

unseen

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IMPACT REPORT 2022

business

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# welcome!



**Justine Carter**  
Director  
Unseen

Welcome to the latest impact report for Unseen Business – a snapshot of the many ways we've worked with you in 2022. I am delighted that Unseen is partnering with a range of businesses to tackle the complexity of modern slavery and worker exploitation head-on.

Our goal is to equip businesses with a strong understanding of the issues, so they are better able to address the risks of modern slavery and ultimately prevent it from occurring.

I am extremely proud of what we have achieved with and through our partners in 2022, and I look forward to building and collaborating with many more businesses in 2023 and beyond.

## contents

Round trip – Unseen's Business Hub	4
An ear to the ground – Unseen's Business Portal	6
2022 in numbers	8
The law and modern slavery – what you need to know	10
The many ways we work with you – training, consultancy, and more	12
Our partners	14
Join us	16

**Unseenuk.org/business**







“Our partnership  
with Unseen has been  
invaluable in supporting  
us to better understand  
and mitigate modern  
slavery risk across our  
supply chain”

Imran Rasul, Chief Procurement Officer,  
Nationwide Building Society

# round trip

**Are you a member of Unseen's Business Hub? If not, it might be time for a rethink. Here's why:**

There are many benefits to joining Unseen's Business Hub and being part of a community of likeminded organisations committed to tackling worker exploitation.

Unseen helps Hub members become more resilient to the risks of modern slavery. We also support you to continuously improve your approach to mitigating potential exploitation, not only in your own business but right through your supply chains.

We help you by:

- providing a range of consultancy services, helping you assess your current approach and prioritise areas for development
- offering unique insights and analysis of worker exploitation and modern slavery that businesses can act on
- presenting events on topical subjects such as financial crime and climate change to inform policies and strategies
- offering practical tips and guidance to address risks
- delivering tailored training to raise awareness among staff, suppliers and other stakeholders.

The Hub also provides a confidential space for collaboration and sharing of good practice.

"Working with Unseen has been brilliant in supporting us to work out what we need to do to tighten our modern slavery approach," says Gary Delafield, Operations Director of Thatchers.

"We have already massively improved our supply chain due diligence. Unseen has also supported us with our modern slavery statement, advising what to include and how best to highlight our successes so far."

Informing all our work with businesses is what we call our continuous improvement cycle (pictured right). As well as helping

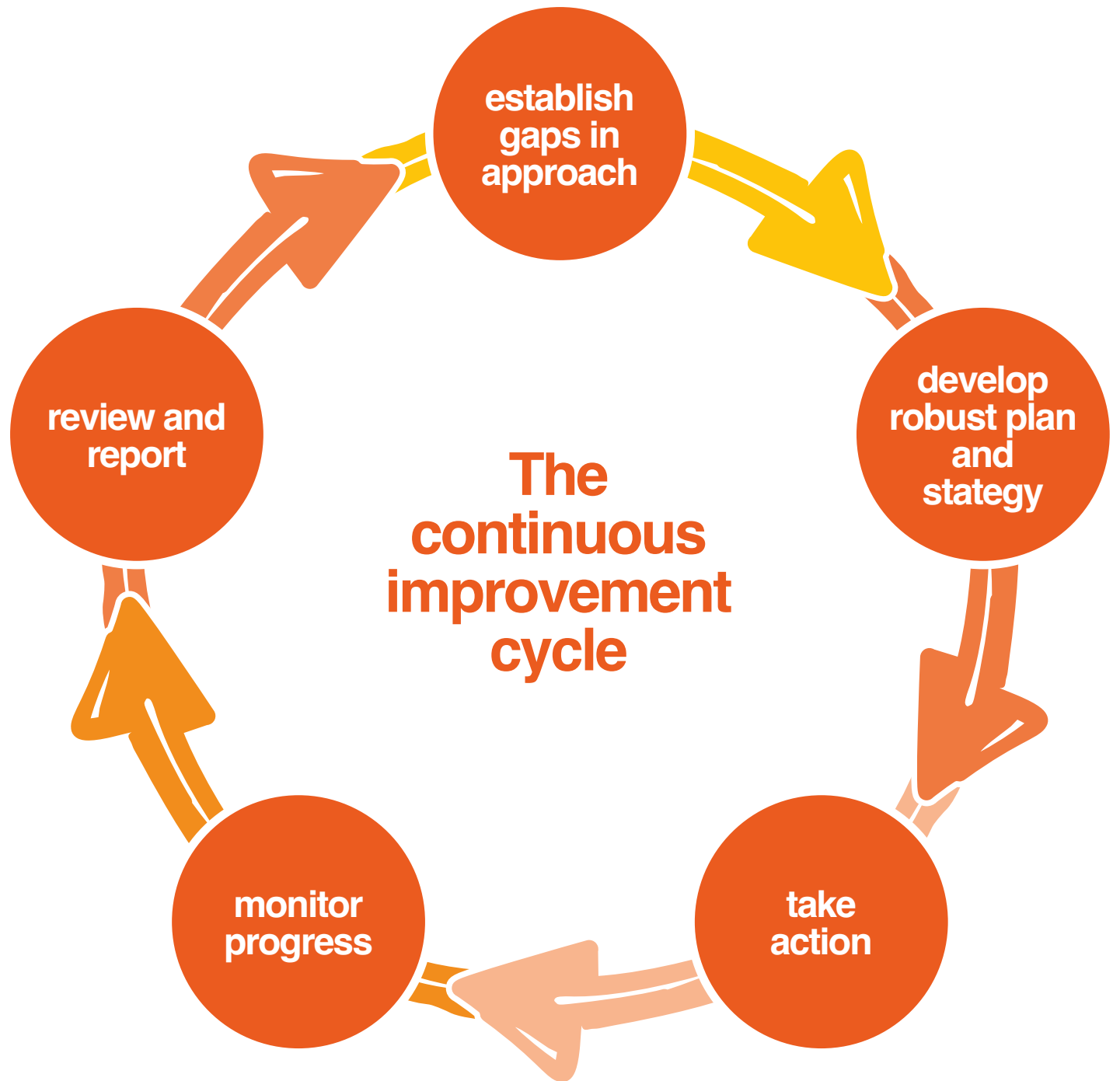
*"Working with Unseen has been brilliant in supporting us to work out how to tighten our modern slavery approach"*

Hub members develop a strong modern slavery statement that goes beyond compliance with the Modern Slavery Act, our Account Managers support partner businesses to go much further and identify:

- gaps in policies and processes that could lead to a risk of modern slavery on their watch (we call this "primary gap analysis")
- the steps they can take to reduce these risks.

One year on from the Hub's launch we're already working with 27 businesses, with more joining every week. We can help you understand where you are at the moment and how to get to where you want to be – all the while continually improving your resilience to modern slavery. Sounds good, doesn't it? Come and join us.

**Find out more and contact us for an informal chat at [unseenuk.org/business](https://unseenuk.org/business)**







# an ear to the

**Unseen's Business Portal is an early warning system that helps you keep an eye on your supply chains.**

As operators of the Modern Slavery & Exploitation Helpline, Unseen collects unique data about potential incidents of forced labour and labour abuse. Our Business Portal is a secure online platform that draws on this data, which includes type of exploitation, location and police force region.

By joining the Portal you'll have access to real-time reports of cases within your sector based on this data – an invaluable early warning system that helps you improve your supply chain transparency.

"As members of Unseen's Helpline Business Portal, it's great to know that Tesco will be alerted to any cases the Helpline receives related to our business or supply chains," says Courtenay Forbes, Tesco's Human Rights Manager.

"This is crucial, particularly when we need to work with other businesses who are Portal members because we are one of several using the same supplier."

*"By knowing about concerns as they arise, we can work collaboratively with the team to establish next steps and protect workers from exploitation"*





**Are workers in your supply chains being treated as they should be?**

# ground

Rory Carnegie/National Crime Agency

**the portal in action**

Here’s an example of how important the Portal is to businesses. Unseen’s Helpline received a call from someone who was concerned about migrant workers at a number of manufacturing sites.

These people had reportedly been trafficked to the UK from Europe and were being forced to work without pay. Their ID documents had been taken from them, they were living in overcrowded conditions (for which they were charged) and they were being threatened with violence if they stepped out of line.

Our Helpline contacted the police immediately and alerted relevant Portal members (in this case retailers) to a potential situation within their supply chains. After requests from the businesses we had contacted, our team also visited two of the sites to assess worker welfare and the conditions they were working in. The team reported what they found, including advice on how to reduce the potential for worker exploitation in the

future, as well as what suppliers could do to strengthen their approach to the issue.

No criminal charges have been brought relating to this case, but we’re still supporting our retail partners to ensure the workers at these sites are getting the support they need, and our business partners are kept up-to-date with any more concerning situations so that they can take appropriate action.

**exploitation reported to portal businesses in 2022**

Sector	Number of modern slavery cases indicated	Number of labour abuse cases indicated
Agriculture	9	8
Construction	8	10
Retail	5	3
Manufacturing	16	16

# the year in numbers

Here's the impact our Business Services made in 2022:

# 57

businesses supported  
to reduce the risks of  
modern slavery  
by our Business  
Account Managers

# 14

supplier worker wellbeing  
audits provided, giving  
businesses insight into  
how workers are recruited  
and treated by suppliers

# 11

Gap analyses completed,  
helping businesses  
understand the gaps in  
their existing policies  
and practices, and how  
to improve them



# 27

businesses joined  
Unseen's Business Hub

# 2

members joined  
Unseen's Business  
Portal, gaining access  
to unique data on  
potential exploitation

# 7

modern slavery  
statements reviewed

# 750+

individuals trained from  
over 30 organisations,  
including Nestlé, The  
Very Group and Disney

# the law and modern slavery

As more countries bring in tougher human rights laws, there is a growing expectation for businesses to be more responsible. Here, we outline what you need to know in a changing legal landscape.

There has been a lot of international action on modern slavery and human rights laws that will affect businesses and their supply chains. As more countries bring in tougher human rights laws the legal landscape is changing, putting more onus on businesses to be more responsible – not only in their own operations but their supply chains too.

With further changes on the horizon, and the powerful investor community calling for better legislation, compliance will only become more difficult, so it's vital that businesses are aware of these changes.

## new legislation

What new international legislation should businesses be aware of in 2023? Here are some highlights from around the world.

- The EU: Human Rights Due Diligence proposal
- USA: Uyghur Forced Labor Prevention Act
- Germany: Supply Chain Due Diligence Act
- Norway: Transparency Act
- Switzerland: Conflict Minerals and Child Labor Due Diligence Provisions
- Canada: Fighting Against Forced Labour and Child Labour in Supply Chains Bill
- Australia: review of the Modern Slavery Act
- Japan: guidelines on Respecting Human Rights in Responsible Supply Chains

Some countries have brought in laws to prohibit child labour in supply chains and to target high-risk sectors

## what human rights laws apply to my business?

The modern slavery laws that apply to your business, and your supply chains, depend on where you operate. Most legislation includes a minimum size requirement. In Norway, the Transparency Act includes smaller businesses that exceed 50 full-time employees and an annual turnover of £5.9 million.

Most of the laws apply to “large” businesses, but of course the definition of large can vary. In the UK, for example, modern slavery legislation applies to businesses trading in the UK with an annual global turnover of £36 million or more.

## complying with international modern slavery legislation

A common theme in all the new legislation is the requirement of adequate due diligence when it comes to modern slavery in the business's operations and supply chains. This means thoroughly assessing the risk of modern slavery occurring and putting in measures to guard against it and deal with it, should it happen.

Such an approach needs to be ongoing, and should be proportionate to a business's size, nature and the context in which it operates.





### the need for a modern slavery statement

An annual modern slavery statement or similar reporting requirement is already in place in the UK, Australia, Canada and many European countries.

More nations are moving to introduce or strengthen similar legislation, including introducing penalties for non-compliance, such as in the UK.

Here is a list of key requirements for a modern slavery statement, common to legislation across the globe. Your statement should be:

- Published – typically on your website
- Approved by the company's board
- Signed and dated by a director or equivalent
- Made publicly available or submitted to the respective authoritative body
- Updated and submitted annually.

### contents of a modern slavery statement

- Exact requirements for a modern slavery statement will vary from country to country, but typically the statement should include:
- The entities covered by the statement, including subsidiaries
- A modern slavery risk assessment
- Steps you're taking to mitigate risk, including how this is monitored, reported on and reviewed
- What you're doing to promote and monitor human rights
- Your anti-corruption approach
- A diversity policy
- Your escalation and remedy policies, should evidence of modern slavery be found
- A supply chain risk assessment
- Audits of key suppliers.

### child and forced labour in supply chains

Some countries have implemented additional legislation to prohibit child labour in supply chains or to target high-risk sectors, activities or industries.

For example, the US has banned the import of goods made with forced labour in the Xinjiang Uyghur Autonomous Region. Such laws will have their own due diligence and reporting requirements.

**To learn more about the changing legal landscape and how your business can comply, join the Unseen Business Hub. To find out more about how Unseen works with business and join the Hub, go to [www.unseenuk.org/business](http://www.unseenuk.org/business)**





# how we work with you

**If you're a business looking to step up your approach to modern slavery, then you've come to the right place. Tell us what you want to do, and we'll design a package to suit.**


We cater for all business sizes, and all sectors. We know that one size doesn't fit all, so take a bespoke approach to everything we do.

From training to partnerships, from help with policies to unique insights into your supply chains... there are so many ways we can help your business and its ESG goals.

Here are some of the ways we worked with you in 2022...







*"We're delighted to be partnering with Unseen to deliver modern slavery training to colleagues, as well as to a range of our key suppliers"*

### **action with scape and achilles**

Unseen's vision is to develop strong networks and partnerships which are sharing good practice and working together to reduce labour exploitation.

We work at both a strategic and grassroots level. For example, Unseen Director Justine Carter is a member of the steering group of SCAPE, providing strategic insight to some of the largest construction companies in the UK.

Meanwhile we've joined forces with social auditing company Achilles, pooling our knowledge, data and insights to improve our collective response to labour abuse on the ground.

This combined approach is helping client businesses better identify issues and potential risks, learn from them and embed best practice in order to guard against future risks.

As experts in the field, our Business Services team also attends many conferences and events across the UK and internationally to share expertise and link with other like-minded organisations.

### **training nestlé uk**

We pride ourselves on our CPD-accredited training that uses real case studies from our Frontline services and sector-specific information.

Our courses are flexible and adapted for every organisation we work with. They offer:

- co-branded e-learning packages
- individual e-learning courses
- group training sessions
- practical workshops to develop actionable plans.

In 2022, we delivered training sessions to 750 individuals in 31 different businesses and agencies, while our e-learning packages were made available to over 50,000 workers. ▶



## how we work with you

“We’re delighted to be partnering with Unseen to deliver modern slavery training to colleagues in Nestlé UK, as well as to a range of our key suppliers,” says Robin Sundaram, Nestlé’s Responsible Sourcing Manager.

“Unseen’s business training is fantastic as it brings to life an issue that is often hidden and not well understood by many.

“The real-life case studies from Unseen’s Modern Slavery & Exploitation Helpline, used within the training, give attendees a much better understanding of how issues can happen and what they can do to prevent it or report it.

“Attendees always comment on how effective, informative and powerful the training is. In fact, one of our colleagues said it was the best training she had received in 25 years.”

## supplier insights for john lewis

Since August 2022, we’ve been supporting the John Lewis Partnership (JLP) to understand more about their supplier risks in the UK.

We’ve visited suppliers’ sites and talked to workers about their wellbeing, giving JLP (Waitrose, pictured below) vital insight into how workers are recruited and treated, and what can be done to minimise potential risks of exploitation.

These visits also give JLP’s suppliers a chance to talk about any difficulties they are facing – especially in the current economic climate. We also advise them on how they can minimise exploitation risks.

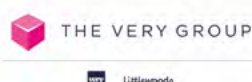
If you partner with Unseen, we’ll make sure your business works more effectively with your suppliers, and that workers in your supply chains and own operations are getting the support they need.





# thank you

Thanks to all our partner businesses working with us for a world without slavery.



# work with us

Unseen is a charity working towards a world without slavery. We provide safehouses and support in the community for survivors of trafficking and modern slavery. We also run the Modern Slavery & Exploitation Helpline and work with businesses, individuals, communities, governments, other charities, and agencies like the police and NHS to stamp out slavery for good.

With millions trapped in forced labour around the world, no supply chain is risk free so businesses have an important part to play. Our partnerships with you help raise awareness and also vital funds to combat modern slavery. Find out how you can work with us at

[unseenuk.org/business](https://unseenuk.org/business)

