

2024

unseen business

IMPACT REPORT



welcome



Justine Carter
Director
Unseen

This year, we've seen remarkable progress—more businesses stepping up, stronger collaborations, and tangible impact across industries. It's clear that business leadership is driving real change in the fight against modern slavery.

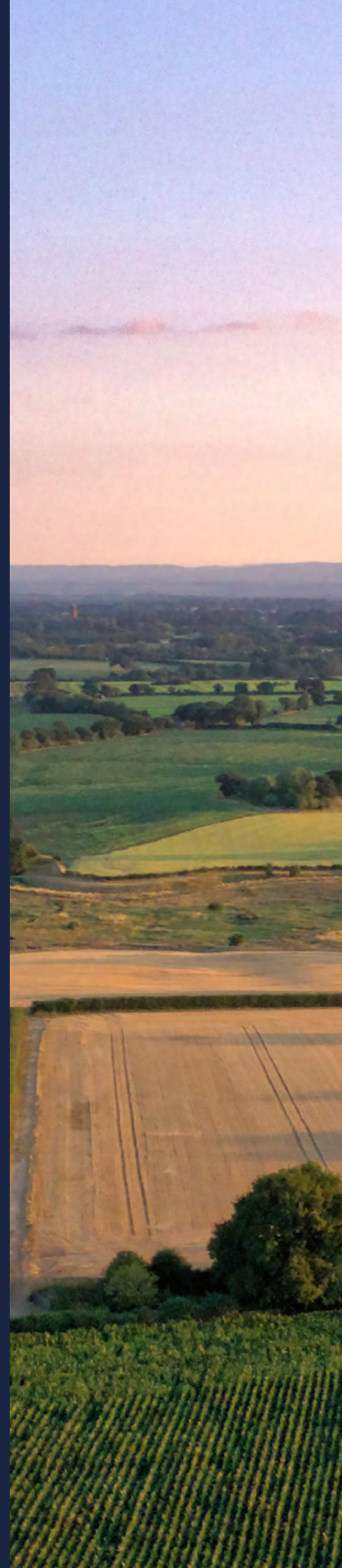
But as modern slavery evolves, so must our response. From shifting trafficking tactics to emerging supply chain risks, businesses must stay ahead of the curve. Increasing anti-slavery legislation underscores the urgency, but compliance alone isn't enough. At Unseen, we empower organisations to lead with purpose, embedding ethical practices and fostering transparency across supply chains.

Looking ahead, we're excited to expand our partnerships, enter new sectors, and create innovative solutions to combat forced labour and abuse. Thank you for being a vital part of this journey—together, we can build a future where every worker is free from exploitation.

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the changing landscape for businesses

How businesses are expected to respond to emerging legislation and risks.

As global efforts to combat forced labour and human rights abuses intensify, businesses are facing a rapidly shifting regulatory landscape. New laws across multiple jurisdictions are escalating compliance obligations, forcing companies to ramp up transparency and tighten due diligence throughout their supply chains. This shift impacts not just multinational corporations, but also UK-based businesses operating globally.

Stronger legislation and stricter compliance obligations

The UK's Modern Slavery Act 2015 (MSA) once led the charge, but now stricter laws are emerging globally—France, Norway, Germany, the US, and Canada are all tightening their regulations. The EU's Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD) raise the bar significantly, demanding businesses report on human rights and environmental impacts. By 2027, the EU's Forced Labour Regulation will ban any product linked to forced labour from entering the EU market, regardless of when or where it was made. The US, meanwhile, is enforcing its 2021 Uyghur Forced Labor Prevention Act, already halting shipments at the border for forced labour concerns.

Section 54 of the UK's MSA currently relies on voluntary self-reporting, but this is also changing. In December 2024, the UK government recognised the need for stronger financial penalties and is consulting on mandatory due diligence requirements to bring the UK in line with global standards.

Additionally, the UK's proposed Employment Rights Bill, which includes the creation of the Fair Work Agency, will centralise labour enforcement and strengthen worker protections—particularly in sectors most vulnerable to forced labour.

Emerging risks and business responsibilities

- **Expanded liability** – Under the CSDDD, companies must trace risks deeper into their supply chains, ensuring compliance beyond first-tier suppliers.
- **Financial risks** – Under the same directive, non-compliance could result in fines of up to 5% of global turnover.
- **Import restrictions and trade barriers** – New import bans mandate that companies prove robust due diligence or risk shipment seizures, supply chain delays, and restricted market access.
- **Heightened enforcement and accountability** – Growing pressure for tighter UK penalties may lead to greater legal liability for forced labour violations.

How businesses should respond

To stay ahead in this evolving landscape, businesses should take proactive steps to strengthen due diligence, enhance transparency, and align with global standards before stricter UK regulations take hold. Beyond compliance, these efforts can help future-proof operations and build resilience in supply chains.

Collaboration is key: work closely with suppliers, regulators, and industry groups to stay ahead of regulatory changes. Technology can help by enabling real-time supply chain monitoring, ensuring you catch risks before they escalate.

With these changes on the horizon, businesses that engage early will be better positioned to navigate new requirements smoothly and demonstrate leadership in ethical supply chain management.



championing ethical leadership

How Unseen's Business Hub supports businesses to lead the way in tackling modern slavery, one step at a time.

There are an estimated 28 million people in situations of forced labour worldwide. And no business—whether large or small, local or global—is immune. Your supply chains could be exposed to risks of exploitation without you even realising it.

At Unseen's Business Hub, we're more than just a network—we're a dynamic community of businesses united by one mission: to tackle forced labour and worker exploitation head-on. Whether you're a small startup or a global enterprise, the Hub is here to support you every stage of your ethical journey.

12

new businesses joined
our Business Hub in 2024

Why join the business hub?

Tackling forced labour risks isn't just about ticking boxes—it's about making a real impact. The pressure to act is growing. Consumers want transparency. Regulators are tightening the rules. Employees want to work for companies that align with their values. So, where do you start? That's where we come in.

Joining the Business Hub means getting tailored support that fits your unique needs—whether you're taking your first steps or strengthening what's already in place. We'll work with you to build a strategy that's not just meaningful but practical, helping you lead by example.

How do we know this works?

Because we've seen it firsthand. In 2024, we were **delighted to see that four of our Hub members—Tesco, Next, Sainsbury's, and M&S—achieved Tier 1 status in the [2024 CCLA Modern Slavery Benchmark Report](#).**



This CCLA Benchmark is an independent assessment that evaluates how well UK-listed businesses find, fix and prevent modern slavery risks. Companies are ranked across five performance tiers, with Tier 1 recognising those demonstrating a mature, proactive approach to human rights due diligence.

Even better? All but one of our members saw improvements in their CCLA scores, with Legal & General jumping two tiers. With the right tools and support, real change isn't just possible—it's measurable.

Now in its third year, the Hub has grown to 57 members with 12 forward-thinking businesses joining in 2024 alone—including McLaren, Booking.com, and Santander. But this isn't just for the big players. Businesses, big and small, are turning to us for the hands-on support they need to lead with confidence. Because ethical leadership isn't just a buzzword—it's how you do business.

How we support you

Within the Hub, we offer a suite of bespoke services designed to empower you every stage:

- **Gap analysis**
- **Risk assessments**
- **Grievance mechanisms**
- **Modern slavery training**
- **Worker wellbeing site visits**
- **Consultancy & modern slavery statement reviews**
- **Internal awareness-raising campaigns**
- **Collaborative Hubs**

Joining the Hub means you're not just talking about responsible practices—you're embedding them into your brand. You'll not only build a more ethical, resilient supply chain, but attract like-minded employees and improve your reputation in the process.

Ready to make a real difference and lead with purpose? Get in touch for an informal chat at unseenuk.org/business, email us at business@unseenuk.org, or call us on 0303 040 2888.

seeing the unseen

How data is driving smarter, more effective business decisions to combat labour exploitation.

Modern slavery is often hidden in plain sight, buried deep within complex supply chains and subcontracting layers—until the right data reveals it. Our Business Portal acts as a crucial tool that helps businesses detect exploitation risks early, enabling proactive and meaningful action to combat modern slavery within their operations and supply chains.

By leveraging insights on labour exploitation and abuse from the Modern Slavery & Exploitation Helpline, the Portal gives businesses the information they need to identify and address risks before harm escalates.

“Partnering with Unseen is a vital next step for ASOS to further enhance our work on modern slavery and help us identify and address modern slavery risks in our supply chain. By working with Unseen, we’ll gain visibility of trends in modern slavery, access opportunities for collaboration, and receive advice, guidance and monitoring on safeguarding on any cases linked to ASOS.”

Adil Rehman, Head of Human Rights, ASOS

What kind of data does the Portal collect —and how is it used?

Every report submitted to the Helpline tells a human story: workers trapped in debt bondage, paid below minimum wage, or facing unsafe conditions. These cases feed into the Portal, allowing businesses to see potential risks within their supply chains. As trends and patterns emerge over time, businesses can pinpoint high-risk suppliers and hotspots for exploitation.

If a case arises, Unseen facilitates collaborative calls between affected businesses and other key stakeholders, such as labour providers and law enforcement. These calls ensure that businesses are aligned on corrective actions and prevention strategies, fostering collaboration that leads to meaningful solutions.



What actions do businesses take based on the insights?

With clearer intelligence on where exploitation is happening, businesses are taking real, tangible steps to prevent it. Guided by our business engagement managers, companies have strengthened procurement policies, enhanced supplier contracts, and introduced more effective routes for reporting. Many have also ramped up supplier training and implemented stricter screening of recruitment agencies to identify and shut down unethical labour practices.

In 2024, the Portal alerted businesses to 57 cases of potential exploitation, involving an estimated 190 workers. Notably, many businesses have reported stronger relationships with suppliers and other retailers thanks to the collaborative calls facilitated by Unseen. These interactions foster greater transparency and trust, allowing businesses to address concerns swiftly and proactively.

While not every case results in substantiated concerns, the Portal has often led to follow-up investigations that uncover additional issues. This ongoing diligence enables businesses to not only resolve existing problems but also take preventive measures to mitigate risk.

More businesses are recognising the power of data in tackling modern slavery. Lidl, McDonald's, and ASOS are among the latest to join the Portal, bringing the total number of active members to 18.

What's next? The power of collaboration

Data alone won't end exploitation, but in the right hands, it can drive real change. The Portal is shifting businesses from reactive responses to proactive prevention—creating safer supply chains, stronger worker protections, and industry-wide accountability.

With more companies joining, the momentum is growing. The greater the engagement, the more powerful the collective impact becomes—transforming insights into action and ensuring every worker is treated with dignity and respect.

190

potential victims of labour exploitation and abuse within 57 cases alerted to Unseen's Business Portal



the year in numbers

Here's the impact our Business Services made in 2024:

18

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

57

businesses supported through Unseen's Business Hub

31

businesses in the Construction Hub, up from 15 in 2023

18

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

33,000

employees reached through our e-learning training programmes

22

businesses in the Finance Hub, up from 10 in 2023

1,800

individuals trained across 63 businesses and statutory agencies



prioritising people: the role of worker wellbeing site visits

Understanding real working conditions and taking action where it matters most.

In 2024, Unseen carried out 18 worker wellbeing site visits across a range of industries, helping businesses uncover hidden risks and take meaningful steps to protect workers.

Sectors like construction, hospitality, and agriculture, which rely heavily on temporary, low-paid, or migrant workers, are particularly vulnerable to modern slavery and labour abuse. While internal audits and policies provide oversight and set expectations, they don't always capture what's really happening on the ground. That's where direct worker engagement makes a difference.

By speaking with workers—whether employed directly, by subcontractors, or through labour providers—businesses gain vital insight into how well protections are working in practice. Our visits in 2024 revealed ongoing risks, from unfair recruitment and unclear employment terms to unexplained pay deductions and limited access to confidential reporting. When left unchecked, these gaps create conditions where exploitation can take hold.

How do worker wellbeing site visits work?

Our worker wellbeing site visits complement traditional audits, focusing on direct conversations with workers. All interviews are conducted by trained experts, using a confidential, person-centred approach. This is particularly crucial where language barriers exist, or workers don't know how to report concerns safely. Through these conversations, we assess how well policies

translate into protections and identify any gaps that could leave workers vulnerable. Supplier codes of conduct are reviewed in practice, highlighting areas where stronger enforcement or clearer communication is needed.

After each visit, businesses receive a detailed report outlining key risks and actionable next steps. If modern slavery or labour abuse is identified, Unseen supports escalation and remediation—helping businesses intervene before harm intensifies.

Worker wellbeing site visits in action – Lloyds Banking Group

Lloyds Banking Group collaborated with Unseen to conduct an on-site worker wellbeing visit at its largest construction site. This visit offered valuable insights into supply chain risks, reinforcing the need for stronger oversight.

“Unseen’s worker wellbeing site visits were a game-changer for us. They showed us the value of proactive engagement in identifying and mitigating exploitation risks on-site.”

Chris Read, Head of Construction and Standards at Lloyds Banking Group

[Download the full case study and see how we supported Lloyds Banking Group.](#)

shifting perspectives

Making modern slavery everyone's business.

Tackling modern slavery isn't just about policies—it's about changing mindsets. At Unseen, we work with businesses to turn awareness into action, guiding employees, suppliers, and decision-makers to recognise exploitation and respond effectively. Through strategic campaigns, workplace events, and industry-wide initiatives, we're making modern slavery everyone's business.

Bringing awareness to the heart of business

At Unseen, we run tailored internal campaigns, equipping businesses with the tools to raise awareness across their workforce, supply chains, and partner networks. We provide strategic communications and industry-specific content, ensuring teams at all levels—from frontline staff to senior leadership—understand the risks and know how to act.

By extending this knowledge to suppliers and workers, we embed modern slavery awareness into company culture, creating a ripple effect that strengthens protections across entire industries.



Senior Business Engagement Manager Lucy Mann joins Connected Places Catapult's Freight Innovation Cluster panel discussion.

Training that translates to real change

Understanding modern slavery is the first step toward tackling it. That's why our bespoke training programmes go beyond checklists—they make the issue real. Using real case studies and unique data from our Modern Slavery & Exploitation Helpline, we help businesses connect the dots between abstract risks and people affected by exploitation.

In 2024 alone, we trained over 1,800 individuals across 63 organisations and reached an additional 33,000 employees through e-learning. Each course is designed to meet the unique needs of an organisation, whether through interactive

workshops, online modules, or tailored sessions for high-risk functions.

It's about more than just training – it's about shifting how we think and inspiring action that lasts. As Chief Sustainability Officer at WSH Limited, Annelie Selander, shares: **"We partnered with Unseen for our mandatory Introduction to Modern Slavery e-learning as we knew they understood our industry and could tailor the content to be relevant for our teams, using real stats and case studies."**



In 2024, Unseen, in partnership with 11 major construction firms, created a powerful short film, *Beyond The Shadows*, shining a spotlight on labour exploitation within the industry. Recognised with a Silver Award at the Smiley Charity Film Awards, the film illustrates the key warning signs of modern slavery on construction sites and emphasises the collective responsibility to combat it. It's now being used in training programmes and site inductions across the built environment sector, increasing the chances of exploitation being identified and reported.

Still from 'Beyond The Shadows'

From awareness to action - Neuen Solutions' story

Neuen Solutions, a vendor management system provider, helps businesses across sectors like healthcare, logistics, and hospitality efficiently manage staffing operations. With tools like Venta, Venloc and Venneu, Neuen streamlines processes while identifying potential modern slavery risks, such as irregular shifts or excessive travel.

Recognising the increasing demand for modern slavery protection, Neuen reached out to us for support in raising awareness and offering actionable solutions to clients.

"We knew there was a need for it. We had this question mark in our own heads of 'are we doing enough, do we know enough?' and we wanted to satisfy that," said Stephen Pownall, Account Director at Neuen.

We took the time to understand Neuen's unique

challenges, working closely to tailor our approach. We created and released three themed articles addressing modern slavery, using case studies and practical advice to engage Neuen's clients. These articles sparked important conversations and helped clients take proactive steps.

Through this partnership, Neuen made significant strides internally, including updating their modern slavery policy and introducing a 'panic button' feature in Venneu, their venue management system, to help raise red flags. The reach of the partnership has been impressive, impacting over 420 individuals across Neuen's clients and internal staff.

"We want to be market leaders in the industry... and make tackling modern slavery an integral part of what we do," said Stephen Pownall.

Taking the conversation beyond the boardroom

Raising awareness is key to tackling modern slavery, which is why we go beyond traditional training. In 2024, we partnered with Superdrug, Premier Foods, and NatWest during Anti-Slavery Week, sparking conversations through pop-up stands, webinars, and expert panel discussions. At NatWest, Business Engagement Managers Freya Smith and Will Robinson (pictured right) spoke to over 500 employees about the financial sector's role in tackling exploitation. At Premier Foods, we joined Morrisons in a webinar equipping 100 employees with tools to identify supply chain risks, while at Superdrug's head office, we engaged staff directly to raise awareness on the ground. By bringing modern slavery out of the shadows, we make it a topic that can't be ignored.



the 2024 unseen business awards

Unseen proudly hosted its second Unseen Business Awards in 2024, celebrating businesses and individuals making significant strides tackling modern slavery. Independently judged by a distinguished panel of experts, the awards spotlighted remarkable initiatives—from creating sustainable livelihoods for survivors to disrupting human trafficking networks through cutting-edge technology.

Award categories and winners

Innovation Award

Recognising groundbreaking approaches to identifying and mitigating modern slavery risks.

Winner: RedCompass Labs

Why they won: RedCompass Labs is revolutionising the fight against human trafficking with its RedFlag Accelerator, using AI to help over 60 banks dismantle the financial infrastructure behind modern slavery

Partnership Award

Recognising the power of teamwork in the fight against modern slavery.

Winner: Lloyds Banking Group

Why they won: Through strategic alliances with Unseen and key industry partners, the Group improved risk management and supplier engagement in the construction sector.

“Being recognised for our efforts in addressing modern slavery by Unseen is an honour, we wish to shine a spotlight on this serious crime and do everything we can to eradicate it. The Unseen Business Awards were a great opportunity to make connections with organisations and individuals who are working purposefully towards our common objectives around human rights and ethical sourcing.”

Chris Read, Head of Construction and Standards at Lloyds Banking Group



Business Impact Award

Highlighting businesses leading the way in preventing and addressing modern slavery.

Winner: Manumit Coffee Roasters

Why they won: Manumit Coffee Roasters has gone beyond just making exceptional coffee. By offering stable employment and rehabilitation to survivors of modern slavery, they've provided sustainable livelihoods for over 13 individuals. Their ethical sourcing and direct trade practices ensure traceability from farm to cup, creating a transparent, fair, and supportive workplace.

"It was both a huge blessing and surprise to receive the 2024 Unseen Business award. We didn't get into this industry for awards or recognition, we simply wanted to help survivors of trafficking and exploitation to rebuild their lives in a safe and supportive environment. However, for our work to have been recognised in this way by an organisation like Unseen is a great honour and we are truly humbled."

Dai Hankey, Director of Manumit Coffee Roasters

Individual Impact Award

Recognising outstanding individuals leading positive change within their organisations.

Winner: Euan Chan, Value Match

Why they won: Euan Chan's work at Value Match, including the development of a groundbreaking supply chain risk mapping methodology, driving policy development and delivering staff training, has set new standards for human rights in small businesses.

"Winning the Individual Impact Award was not only a huge encouragement personally, but it proudly demonstrated that small businesses are capable of setting new standards in human rights. This award, coming from a prestigious organisation like Unseen, really put our company on the map for commitment to best practice no matter the size of your organisation."

Euan Chan, Lead Consultant within Sustainability, Human Rights and Social Impact at Value Match

Unseen's Star of the Year award

Recognising exceptional commitment from individuals within Unseen Business member organisations

Winner: Nishma Shah, Legal & General

Why they won: Nishma Shah has driven Legal & General's commitment to tackling modern slavery through bespoke training, transparent reporting, and industry-wide engagement.

Learn more about the awards and explore the stories of these champions at:

<https://www.unseenuk.org/unseen-business-awards-2024-winners/>

driving change through collaboration: unseen's industry hubs


Modern slavery is a complex issue that no business can tackle alone. That's why Unseen's Collaborative Hubs are thriving, uniting key players in two high-risk sectors: construction and finance. Membership has more than doubled in the past year, with 31 businesses in the Construction Hub and 22 in the Finance Hub. Led by our expert business engagement managers, these spaces provide a platform for industry leaders to share insights, address emerging risks, and create solutions in a non-competitive environment.

With an estimated 2.6 million construction workers globally in situations of forced labour* and the sector consistently ranking among the top five most vulnerable on our Modern Slavery & Exploitation Helpline, the industry faces a critical responsibility. This year, the Construction Hub has focused on key issues—

from legislative updates to improving worker wellbeing through site visits. Members have worked through real case studies and defined best practices for escalation and remediation, ensuring workers at every level are protected.

Meanwhile, the Finance Hub has tackled many issues, addressing how financial institutions can unknowingly fuel a \$236 billion illegal industry**. Members have upskilled whistleblowing teams, analysed CCLA benchmark scores, and engaged in workshops to better understand the sector's role in identifying and preventing exploitation.

Through collaboration, our Hubs are turning discussion into tangible action.



"The power of the Hubs lies in collaboration—businesses coming together to share real challenges and insights, driving industry-wide solutions."

Holly Kirk, Business Engagement Manager at Unseen

* International Labour Organization, *Global Estimates of Modern Slavery Forced Labour and Forced Marriage*, page 32: https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_norm/%40pec/documents/publication/wcms_854733.pdf

**International Labour Organization, *Profits and Poverty: The economics of forced labour*, page 1: <https://www.ilo.org/resource/news/annual-profits-forced-labour-amount-us-236-billion-ilo-report-finds>

Learn more about our Collaborative Hubs at: unseenuk.org/business/collaborative-hubs

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 safe houses 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 28 million trapped in forced labour around the world, no business is risk free. Our partnerships with you help raise awareness and vital funds to combat modern slavery. Find out how you can work with us at:

unseenuk.org/business

