

# Modern Slavery – practical steps

## Operational Toolkit overview

Anna Cantwell

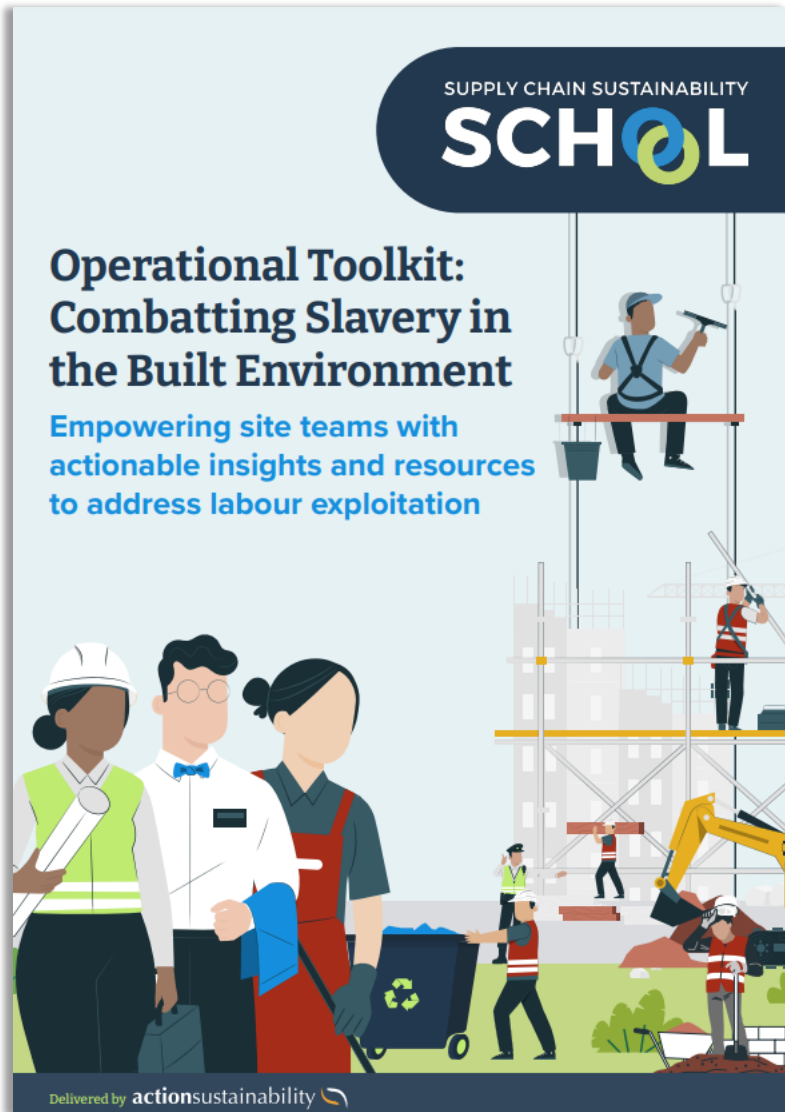


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**YORhub**

"Action Sustainability and the Supply Chain Sustainability School continue to lead the construction industry in combatting modern slavery with this exemplary Operational Toolkit. This practical guide is exactly what the industry has been waiting for; it details how criminals commit modern slavery and provides actionable examples of initiatives that contractors can implement. In many cases, these measures can prevent modern slavery from ever happening, and where it does occur, the toolkit enhances the likelihood of detection. All of this is supported by web links to a wealth of additional resources."

*Steve Baker, Head of Construction Services & YORhub  
Chair of Local Government Association Construction Steering Group  
Chair of Local Government Association Digital Construction Steering Group*



# A bit about you



Go to

**[www.menti.com](https://www.menti.com)**

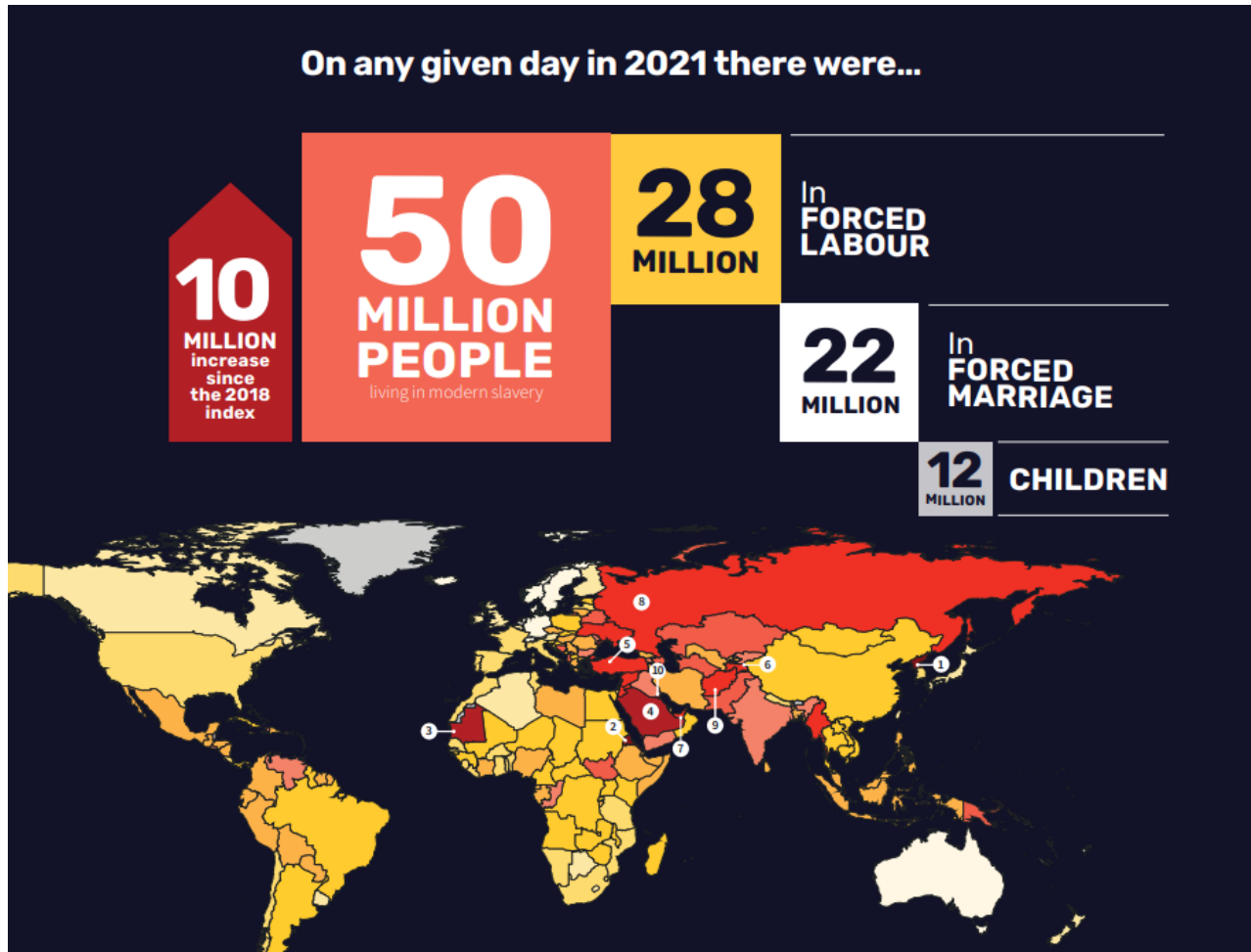
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**Definition:**

Modern Slavery is the illegal exploitation of people for personal or commercial gain. It's the most extreme form of exploitation. Victims are trapped in servitude, which they were deceived or coerced into, and cannot leave.



17,004 potential victims of modern slavery were referred to the UK Home Office in 2023

## Beyond the Shadows - Unseen





## Gangmasters & Labour Abuse Authority

### Most common types of exploitation reported by the built environment sector



Documents withheld by employer or false documentation used.



Workers being given no information or false information about their rights.



Unwarranted / unexplained deductions from wages.



Employer not paying the full tax or national insurance contributions.



Absence of contract of employment.



Poor, tied in accommodation.



Misleading information about the nature of the employment.



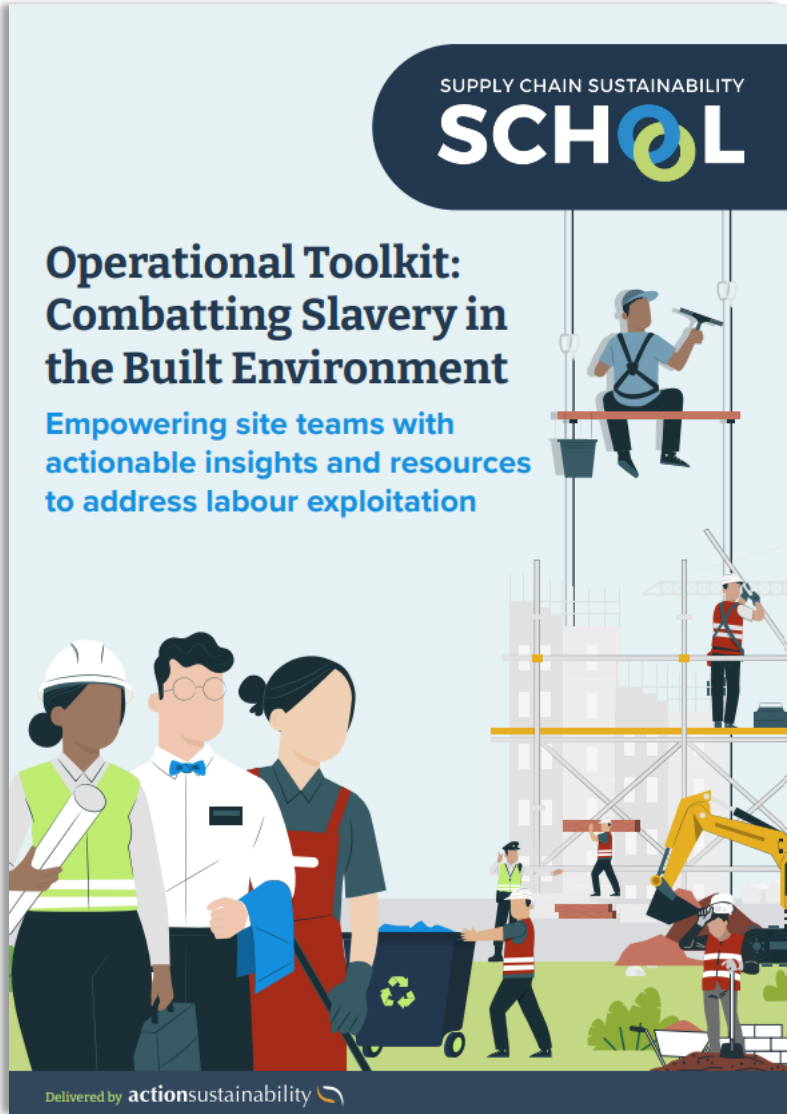
Threats to expose the worker to the authorities.



Debt bondage: When someone is forced to work to repay a debt, and their freedom is restricted until the debt is cleared. The debt is usually structured in a way that it is impossible to repay as the debt greatly exceeds the worth of the initial loan, trapping the person in a cycle of exploitation and servitude).




Required to perform forced or compulsory labour.



SUPPLY CHAIN SUSTAINABILITY  
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# Operational Toolkit: Combatting Slavery in the Built Environment

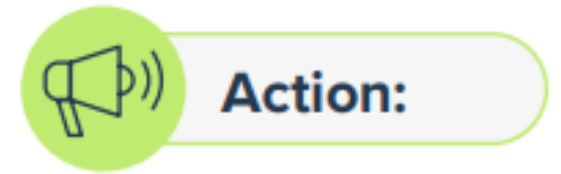
Empowering site teams with  
actionable insights and resources  
to address labour exploitation

Delivered by actionsustainability 

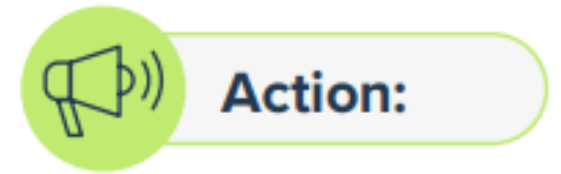
The cover features an illustration of a construction site with workers on scaffolding, a worker on a suspended platform, and a group of three professionals (two women and one man) in the foreground. A recycling bin is also visible.

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<p><b>Risk 1: ‘It won’t happen to us’ - lack of awareness on the prevalence of slavery and labour exploitation in the UK and of the sophisticated techniques that exploiters use to infiltrate businesses.</b></p>	<ul style="list-style-type: none"> <li>✓ Communicate latest insights</li> <li>✓ Dispel the myth that reputable businesses can’t be infiltrated by exploiters</li> <li>✓ Raise awareness that exploiters can appear just like anyone else</li> </ul>
<p><b>Risk 2: Workers not knowing how, or why they should report any concerns.</b></p>	<ul style="list-style-type: none"> <li>✓ Train regularly</li> <li>✓ Use language such as ‘labour rights, ‘labour exploitation’ and ‘worker welfare’</li> <li>✓ Engage agencies, recruiters and sub-contractors</li> <li>✓ Ensure everyone is confident in knowing what to do if they suspect someone is a victim</li> <li>✓ Communicate how to spot the signs and reporting mechanisms</li> <li>✓ Put up posters in strategic places</li> </ul>



<p><b>Risk 3: Workers unaware of their basic entitlements e.g. hours of work, itemised payslips, wage deductions, terms and conditions, place of work.</b></p> <p><b>Risk 4: Cultural and language barriers.</b></p>	<ul style="list-style-type: none"> <li>✓ Communicate worker rights in a variety of formats</li> <li>✓ Conduct worker voice surveys</li> <li>✓ Embed requirements into procurement process</li> <li>✓ Educate on how to understand a payslip</li> <li>✓ Inform and allow right to join or form a trade union</li> <li>✓ Translate key information</li> <li>✓ Provide independent interpreters and translators</li> <li>✓ Ask about recruitment process and fees</li> </ul>
<p><b>Risk 5: Lapses in security and vetting, including right to work checks not being conducted effectively.</b></p>	<ul style="list-style-type: none"> <li>✓ Use technology to verify</li> <li>✓ Cross check a worker’s personal details and employment agreement</li> <li>✓ Conduct regular checks of workers’ personal details</li> <li>✓ Periodically and randomly verify records</li> <li>✓ Prohibit casually bringing workers onto sites</li> <li>✓ Be suspicious of one worker interpreting for a group of workers</li> </ul>



**Risk 6: Organisations not set up to deal with suspicions of slavery, resulting in potential victims not receiving the support they need.**

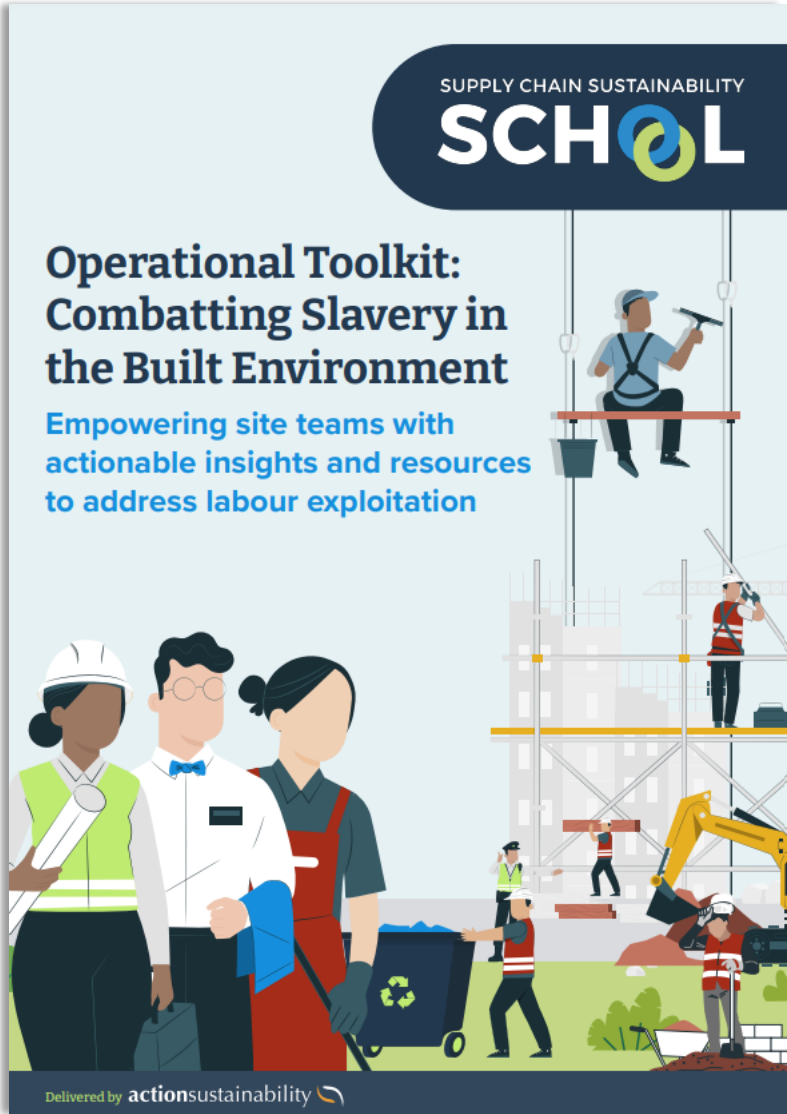
- ✓ Establish and communicate a remediation policy and process
- ✓ Consider how to support victims



SUPPLY CHAIN SUSTAINABILITY  
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# Operational Toolkit: Combatting Slavery in the Built Environment

Empowering site teams with  
actionable insights and resources  
to address labour exploitation



The illustration depicts a construction site with various workers. In the foreground, three professionals (two women and one man) are shown in business attire, one holding a rolled-up document. In the background, several construction workers in safety gear are engaged in different tasks: one is on a suspended platform, another is on a scaffolding, and others are near a yellow excavator and a recycling bin. The scene is set against a light blue sky and a green ground area.

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