

# Modern Slavery and Human Trafficking Policy

## Supply Chain Slavery

*Company Briefing on Aspects of Recent Legislation*

### Policy

A recent survey by the Chartered Institute of Procurement and Supply (CIPS) found three in five companies were unaware of bigger businesses' duties to report on action to eliminate slavery in their supply chains.

The Modern Slavery Act came into force in October 2015 and introduced a requirement on all businesses with a turnover of more than £36 million to publish a slavery and human trafficking statement each financial year, outlining the steps they have taken to eliminate slave and child labour from their supply chains. The reporting obligation aimed to prevent forced and child labour in the UK and abroad by putting greater onus on larger businesses to be accountable for the practices of their suppliers.

The idea intended was to have a cascade effect on SMEs with a sub-£36m turnover to encourage them to ensure that their supply chains are also slavery-free. A subsequent survey carried out by YouGov has found many UK SMEs are still unaware of this knock-on effect and are unprepared to deal with forced and slave labour issues.

The Directors of Total Office have looked at the issues and are aware that instances of slave and forced labour have occurred in the UK. A government requirement is that all potential employees are vetted closely to establish their identity and right to work in the UK. Identification by passport, birth certificate or other means stipulated by government is now mandatory with additional checks to be made on work visas. Heavy fines can be levied on a company employing an illegal worker. As such, it would be helpful if Total Office employees having any suspicion about the identity and legality of a co-worker, bring it to the attention of a director.

Signed..... 

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Managing Director

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The question of slavery forced labour and trafficking in the supply chain are a major concern, particularly to the larger organisations relying heavily on elongated and distant supply chains. Primark found, to their cost, that child labour was employed in the manufacture of clothing in SEAsia. This had an immediate negative effect on sales and their reputation.

Total Office is fortunate, to this extent, that it does not directly import goods from developing countries. In what has been a 'due diligence' exercise directors have checked the provenance of its major suppliers who have taken the requirements of the Act seriously and made suitable arrangements to check their supply chains and report on their compliance.

The CIPS has stated that - "To truly eliminate this evil from UK procurement, supply chains need to be mapped and simple measures put in place. Partnerships between larger corporations and smaller SMEs will be instrumental in driving out malpractice in the supply chain. The legal duty in the Act must not override the moral obligation of us all to make sure our supply chains are slavery-free."

Total Office has already established its own Ethical Trading Policy and on occasion is asked by their larger clients to give assurance that it complies with the requirements of the Act.

A large proportion of office supplies are sourced from producers in low-cost countries in South East Asia, Africa and South America. While many in these categories have committed to the recognised code of labour practices and payment, a minority may still flout international standards and ethics.

Advisory bodies have said there are simple and effective steps SMEs like Total Office could take to ensure their supply chains are slavery-free. These included: ensuring workers were being paid the minimum wage, mapping supply chains, carry out site inspections and provide training. These latter objectives are the province of our major supply companies who have established reputations to protect.

