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Agriculture and Modern Slavery Act Reporting: Increasing engagement but poor quality from a high risk sector

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Introduction

The agricultural sector is considered high risk for forms of labour exploitation, including modern slavery. The International Labour Organisation places agriculture, alongside forestry and fishing, as the sector with the fourth highest proportion of victims of forced labour worldwide.ⁱ Within the UK, there is a lack of formal data on the prevalence of slavery within agriculture. However, the characteristics of work within this sector – tasks which are easily replicable and labourers thus easily replaceable, and a reliance on low-skilled seasonal labour – create vulnerability to modern slavery and other forms of exploitation. Supporting this, the Gangmasters and Labour Abuse Authority (GLAA) reports that most of its intelligence relates to the agriculture sector and states that workers report paying work-finding fees and working some of the longest hours weekly across sectors.ⁱⁱ These conditions are combined with pressure on food prices from food retailers as they seek to gain competitive advantage which can push down wages and enable the conditions for slavery to occur.ⁱⁱⁱ

It is important, therefore, that the UK agricultural sector adheres to the Modern Slavery Act's reporting requirements and takes meaningful steps towards ensuring decent labour standards within its supply chains. This study interrogates how the sector has engaged with Section 54 of the Modern Slavery Act, which requires businesses with a turnover of £36 million or more to publish an annual modern slavery statement explaining what steps, if any, they are taking to address modern slavery within their operations and supply chains. These statements must be signed by a director, approved by the board and linked from the company's homepage.

The study has asked five key questions:

1. How many agricultural companies within scope of Section 54 have produced modern slavery statements?
2. How compliant are those statements with the requirements of the law?
3. What quality are those statements, measured against government guidance?
4. Have statements – in terms of both compliance and quality – improved over time?
5. How does this compare to other high-risk sectors?

Summary of findings

Key facts

- **89% of agricultural companies** which fall within scope of the Modern Slavery Act's corporate reporting requirement had published a modern slavery statement by June 2019, although **12% of companies had an out-of-date statement** and were thus no longer complying
- **Only 46% of these statements were compliant with the requirements of the law**, meaning overall **only 41% of the agricultural sector is abiding by the terms of s54 of the Modern Slavery Act**. But this is more than double the 19% that complied in June 2017, one year after the law came in to force
- **Poor statements showed a tick-box approach**, providing only generic comments about zero tolerance to modern slavery with no indication of actions taken to address the issue
- **69% of companies said little or nothing about their use of risk appraisal**, nor identified areas of high risk
- **Over 60% of statements lacked any mention of the effectiveness of the steps taken to address slavery**, despite government guidance advising this
- **41% of statements gave little or no information** about any training put in place
- **The agricultural sector's low compliance rate in 2017 was found to be in line with that of other high-risk sectors** (food processing and packaging; mining; hotels), suggesting poor compliance rates in the early years were the norm. This compared with much higher rates of compliance for the Gender Pay Gap reporting rules (87% on day one in the first year of reporting)
- **The quality of content in agricultural companies' modern slavery statements started out low** (scoring an average of 13.0 out of 30). This declined from 2017 to 2018, and declined again in 2019: new engagers have not learned from their peers or from best practice guidance

Poor initial performance, now with increasing engagement but poorer quality

By June 2017, just over one year after the reporting requirements of the Act came in to force, only 50% of agricultural companies above the £36 million threshold had produced a modern slavery statement, and only 38% of these statements conformed to all three requirements, meaning there was an overall compliance rate for the sector of only 19%. Additionally, the content quality across the statements was low.

One year on, in June 2018, 67% of agricultural companies had produced a statement, but as a number of these statements were from 2017 and therefore out of date, only 44% of companies had an in-date statement. There had been little improvement in terms of the quality of statements. Those companies that were reporting in June 2017 had not made significant progress in the year and new engagers had not learned from the response of the earlier adopters, producing below-average quality statements. Only a quarter of companies revisited¹ their statements during the year from June 2017 to June 2018, and only 9% of companies increased the quality of their statements. Those companies that had higher quality statements in 2017 were most likely to have revised their statements a year later.

Analysing the statements from this sector another year on, in June 2019, the existence rate has improved significantly, with nearly 90% of companies now having a statement, up from 50% in 2017. Compliance has more than doubled, from 19% to 42% of companies having a statement and meeting all three of the

requirements. But the quality of statements, which fell marginally between 2017 and 2018, has fallen further. While only in rare cases has a specific company's statement deteriorated, the new engagers had poorer scoring statements and thus reduced the sector average. They continue to fail to learn from or build on either their peers or developing good practice and guidance which is increasingly available.

Overall, therefore, the findings are concerning: Section 54 transparency in supply chain statements are poor in agricultural companies, despite it being a high risk sector. These results support the Independent Anti-Slavery Commissioner's conclusion early in 2018 that "modern slavery statements were patchy in quality, with some companies failing to produce them at all and others demonstrating little meaningful engagement with the issues",^{iv} and supports the Government's comment in July 2019 that "many organisations have published poor quality statements which contain little or no evidence of the steps they have taken to prevent modern slavery and human trafficking in their operations and supply chains".^v

In essence, the poor quality of many statements indicates two issues: firstly, a lack of a sense of obligation to adhere to the Act's requirements under Section 54, which points to the need for greater government enforcement of this provision (which may be addressed via the Government Response to the Independent Review), and secondly, a tactical response to the Act and the issue of modern slavery, demonstrated through non-substantive responses, a box-ticking attitude and minimal compliance.

¹ 'Revisited' refers to statements where some change had been made, from simply rolling the date forward a year through to a material revision of content.

Recommendations for business

- 1. If all else fails, read the instructions.** The legislation itself is relatively short and easy to digest. There is also a range of helpful advice both from Government, see [here](#)^{vi} and [here](#)^{vii}, and from charities/consultancies: [CORE](#)^{viii}, [BHRRC](#)^{ix}, [ETI](#)^x, [Ergon](#)^{xi}, [Modern Slavery Registry](#)^{xii}, [TISCReport](#)^{xiii}, and [Stronger Together](#)^{xiv}.
- 2. Start.** A statement doesn't have to be perfect first time around, but do something, then build on it. This will probably mirror the reality of the work being done on modern slavery.
- 3. Be honest.** The best reporters are not necessarily the best actors. This will be clear to your readers.
- 4. Be clear.** Explain your policy and what you are doing simply. Avoid jargon and aspirational waffle. Length is no guarantee of quality, and forcing yourself to be brief will test whether you really have something worthwhile to say.
- 5. Reach out – don't reinvent the wheel.** A disappointing result from this research is that those coming late to reporting appear not to have learnt from those who started earlier. This shouldn't be seen as an area for competitive advantage. Get in touch with your peers, sector groups, and industry bodies.
- 6. Reach up.** The statement should be signed by a director, and approved by the board. So get them involved. Find a high-level champion.
- 7. Use a risk-based approach.** This will focus your statement, just as a risk-based approach will focus your work on modern slavery.
- 8. Let the reporting drive action.** Yes, ideally any statement (be it modern slavery, integrated reporting, gender pay gap, carbon report) would be the natural outcome of a perfect situation that already exists. This isn't the real world, and the need to produce a statement can be the catalyst for what really matters; taking action.
- 9. Remember measured effectiveness and performance indicators.** This was by far the weakest area of most reports, and therefore probably of the work being done. Most organisations use KPIs to stretch and monitor themselves, so get some established. Generalisations stand out in a weak report and don't achieve anything on the ground.

10. Be complete and revisit. Section 54(5) of the Modern Slavery Act recommends that statements cover six areas, so address them all. If they aren't relevant, explain why. And there is a requirement to produce a new statement each year. Update the statement, don't just re-date it – make it clear that you care.

Recommendations for Government

To increase and improve modern slavery reporting in the Agricultural sector we support, in particular, the following recommendations made in the [final report](#)^{xv} of the Independent Review of the Modern Slavery Act:

Recommendation 15: Government should establish an internal* list of companies in scope of section 54 and check with companies whether they are covered by the legislation. [*We recommend that the list be made public rather than it just being an internal list, to allow civil society and the public to continue to play a role in holding businesses to account.]

Recommendation 17, section 54(4)(b): which allows companies to report they have taken no steps to address modern slavery in their supply chains, should be removed.

Recommendation 18, section 54(5): 'may' should be changed to 'must' or 'shall', with the effect that the six areas set out as areas that an organisation's statement may cover will become mandatory. If a company determines that one of the headings is not applicable to their business, it should be required to explain why.

Recommendation 19: Statutory guidance on transparency in supply chains should be strengthened to include a template of the information organisations are expected to provide on each of the six areas that a statement might cover.

Recommendation 26: There should be a central government-run repository to which companies are required to upload their [modern slavery] statements and which should be easily accessible to the public, free of charge.

Recommendation 30: Government should make the necessary legislative provisions to strengthen its approach to tackling non-compliance, adopting a gradual approach: initial warnings, fines (as a percentage of turnover), court summons and directors' disqualification.

Performance of the agricultural sector in detail and progress from 2017 to 2019

All UK-registered agricultural companies with a turnover of £36m or more were reviewed. This was a two-stage process, first to consider compliance (existence of a statement and conformance with the three requirements of Section 54 – visibility, sign-off and board approval), and second to consider the quality of the statement. This process started in June 2017, one year after the Act came in to force, and was repeated in June 2018 and again in June 2019.

Existence

The set of companies which were required to report changed between 2017 and 2019 for two reasons: i) some companies fell out of scope because their turnover dropped below £36m while others came in to scope because their turnover grew above £36m; and ii) corporate reorganisations saw some companies merging in to other corporate groups.

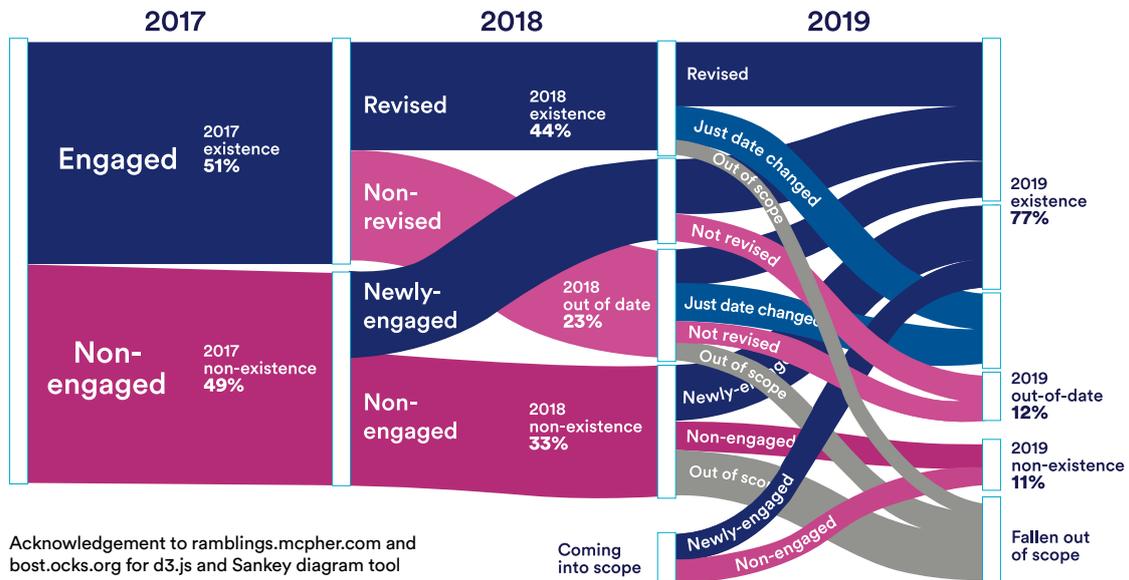
In June 2017, 51% of companies had produced a statement. This had increased to 67% in 2018 at face value, but only 44% if the out-of-date statements were excluded, as they no longer complied. By June 2019 the existence rate had increased to 89% at face value, or 77% if out-of-date statements are excluded:

Table 1: Existence rates 2017, 2018 and 2019

	2017	2018	2019
Statement exists	51%	67%	89%
of which, out of date	n/a	23%	12%
Statement doesn't exist	49%	33%	11%

This level of engagement, and how each category changed year on year, can be tracked as follows:

Figure 1: Engagement over time



Acknowledgement to ramblings.mcpher.com and bost.ocks.org for d3.js and Sankey diagram tool

It is encouraging to note that the non-engaged group has reduced significantly year on year. A few companies which engaged in 2017 have done nothing with their statement since then, but a greater number have revised their statements in each subsequent year.

Conformance

All aspects of conformance (visibility, sign-off and board approval) have increased since 2017. The biggest improvement is around visibility, where 92% of companies that have produced a statement and have a website, have a link to that statement on the homepage or obviously accessible from it (for example, via a drop-down menu about Corporate Responsibility). 90% of statements in 2019 were signed by a board director, up from 75% in 2017. Board approval remains the poorest element of conformance, with only 54% of statements recording they were approved by the board, a marginal increase on the 50% of 2017. The overall conformance rate was up to 46%, 8 points higher than in 2017.

While these might seem to be trivial matters of administration, they are legal requirements and are symptomatic of an organisation's engagement with the issue of modern slavery and their transparency about what they are doing. An example of a company taking their obligations seriously is one with a statement which was revised and improved for 2019, and which is now signed by seven board members, including the CEO and country/divisional MDs, and the directors of HR, finance and procurement.

	2017	2018	2019
Visibility	67%	73%	92%
Sign-off	75%	80%	90%
Approval	50%	40%	54%
All three, i.e. Conformance rate	38%	30%	46%

Compliance

To comply, a company must have a statement, that statement must be in-date, and it must conform to the requirements of s54. Combining the existence and conformance data shows that overall compliance has doubled, from 19% in 2017 to 41% in 2019, but still less than one-half of companies are complying.

One further observation emerges around compliance: Official guidance says that websites should include all modern slavery statements, not just the current year, so that the public can compare statements and monitor progress within an organisation over time. Only two companies in the agricultural sector now do this, albeit this is up from none in 2018.

Since this research was started, another example of mandated Corporate Social Responsibility, the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017 (GPG), came into force. This requires companies with more than 250 staff to report gender pay gap data online to the Government Equalities Office and publish this on the company's own website. Unlike the Modern Slavery Act, which has none of the following features, the GPG regulations mandate a single public repository for organisations' data; public sector bodies are required to report; there is a government list of companies required to report; there is a single annual reporting deadline and specific requirements for what data is to be reported; and a single government agency has oversight. Slightly more than 10,000 companies had reported by the deadline of 4th April 2018. Those that hadn't reported by the deadline (estimated by the Equality and Human Rights Commission (EHRC) to be around 1,500 companies) were to be contacted by the EHRC within a week, requiring them to report within a month. Non-compliance was to be met with naming and shaming, court action and potentially unlimited fines.^{xvi}

An 87% compliance rate for Gender Pay Gap reporting compares to a 50% existence rate and a 19% compliance rate within the agricultural sector.

Board approval remains the poorest element of conformance, with only 54% of statements recording they were approved by the board, a marginal increase on the 50% of 2017.

These results suggested a compliance rate of 87% for GPG on day one in the first year of reporting, which will have increased as the EHRC contacted non-compliant firms. This compared to a 50% response (existence) rate and a 19% compliance rate within the agricultural sector with the minimum requirements of Section 54 of the Modern Slavery Act more than one year after the legislation came into force. The data to be disclosed under GPG is much more circumscribed and statistical, but the discrepancy between compliance rates raises questions about the extent to which the features present in the GPG regulations and its enforcement are needed for Section 54.

Performance of the agricultural sector in comparison to other high risk sectors

To provide context and comparison, the original study in 2017 also looked at existence and conformance (but not quality) in three other high risk areas: food processing and packaging, mining, and hotels. Across these sectors, half of companies with websites had produced statements. Food processing and packaging lead at 59%, mining followed at 50%, then the hotels sector at 36%. Across all four sectors, 50% of companies had produced a statement. The existence rate for the agricultural sector in 2017, at 51%, was therefore average.

Overall compliance rates for the comparative sectors were similarly close to the agricultural sector: mining at 21%, food processing and packing 16%, and hotels 15%, giving an average of 17%, slightly behind the agricultural sector at 19%. The prima facie poor results for the agricultural sector were par for the course.

Table 3: Company compliance rates across different sectors, 2017

	Ag	Comparative sectors				Total
		FPP	Mining	Hotels	Total	
Existence	51%	59%	50%	36%	50%	50%
Visibility	40%	46%	46%	28%	41%	41%
Sign-off	37%	49%	42%	28%	41%	40%
Approval	26%	23%	25%	15%	21%	22%
All compliance elements	19%	16%	21%	15%	17%	17%

Quality

Home Office guidance says that it is expected that organisations will “build on their statements year on year and for the statements to evolve and improve over time”.^{xvii} For each year in the study, statements were analysed and graded with reference to six content areas: Business and supply chain structure, Policies, Due diligence processes, Risk and risk management, Measured effectiveness and performance indicators, and Staff training. These areas are those recommended in the Act and in the government guidance for Section 54 statements.^{xviii}

The content areas of relative strength and weakness have remained fairly much the same across the years: **due diligence processes** was the best addressed area in 2017, and remains the highest scoring area, albeit that the poorer performance from the new engagers has reduced the average score; **effectiveness measures and performance indicators** was the least well addressed area in 2017 and is again in 2019, although scores are rising. Discussion of **policies**, which was ahead of **staff training** in 2017, has now dipped below, as new engagers give relatively better attention to training.

Table 4: Content scores, 2017 and 2019

Content area	Average score (out of 5)		
	2017	2019	Movement
Business and supply chain structure	2.1	1.8	-0.3
Policies	2.6	2.1	-0.5
Due diligence processes	3.2	2.6	-0.6
Risk and risk management	2.2	2.0	-0.2
Measured effectiveness and performance indicators	0.4	0.8	+0.4
Staff training	2.4	2.3	-0.1
Average	12.9	11.3	-1.6

Business and supply chain structure

High scoring statements included data about the company – its products, processes, location, and structure – and information about tier 1 suppliers, so as to give a sense of the supply chain. No statements included information on tier 2 suppliers, but many agricultural companies have fairly flat supply chains: for example, one company grows organic produce on its own farms and delivers it direct to the end consumer.

Once written, few companies have revisited the information provided on their business and supply chain structure. Poor statements thus remain poor, suggesting many companies are not looking at best practice statements. Most (although not all) say something about their own business, but statements are weaker when it comes to supply chain information.

A large egg producer and packer published its first statement in July 2017. This simply gave a succinct description of what is a straightforward business. Having been revised in January 2019, the statement now discusses its supply chain, but the reader still learns nothing about what these suppliers do for the company, where they are based, why modern slavery may or may not be an issue in these suppliers, nor how the company is engaging with them on the issue.

One of the few PLCs in the sector, which scores well in this area, combines the description of its supply chain with an analysis of where the higher risks are. The reader learns about their tier 1 suppliers, where they are, what they supply, and the basis of the terms of trade.

When reading statements that scored zero points for this section, the reader does not get any information about the company, its products, services or customers – not even that they are involved in agricultural activity.

**Once written,
few companies
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Policies

From a relatively good start in 2017, this area has worsened, again as a result of weak new engagers. No statement that existed in 2017 or 2018 has deteriorated, but only two revisers showed any improvement. The highest scoring statements set out the company's modern slavery policy and how this links in with other company policies. A family owned business with a turnover of £36.5m that grows and packs root vegetables, lists the business policies it has in place that relate to modern slavery, including policies on Ethical and Human Rights, Whistleblowing, Business Practice, Health & Safety, Prevention of Illegal working, and Anti-Bribery.

To achieve top scores in this area, a company must have, inter alia, a modern slavery policy in place not just for itself but which it extends into its supply chain, including a supplier code of conduct. A UK subsidiary of a major multinational has a supplier code of conduct which has been published in 30 languages as the company engages with its international supply chain. Some companies refer to their use of work done by trade bodies, for example the British Poultry Council Poultry Supply Chain Ethical Compliance Code of Practice.

Poor statements included generic comments about zero tolerance to modern slavery, but gave no indication of policies that would help effect this.

Due diligence processes

This was the highest scoring area in 2017, 2018 and again in 2019, but deteriorated the most year-on-year. Engaged companies describe working with expert auditing or non-governmental organisations to assess their supply chains. They have clear codes of conduct and require GLAA licenses for all providers of relevant contract labour. One of the best statements in the sector uses key performance indicators (KPIs) related to due diligence processes, publishing, for example, the proportion of company sites that have completed an agency ethical audit at least every six months, and the number and proportion of cases received by their whistle-blower hotline that have been closed out.

Poor statements gave no indication of any specific due diligence processes, again using generic, aspirational comments, for example: "We strive to ensure that we, and our supply chain, act in compliance [with the Act] and have continued to monitor such compliance."

Risk and risk management

There is crossover between risk management and assessment and the previous content area, due diligence processes. Similar third parties can be used for both, and there was a moderately positive correlation between performance in these two areas in 2017 (+0.41).

There is a real divide in this category, with around 40% of companies who actively use risk analysis as a tool for identifying key areas for focus in their own businesses and supply chains, and use tools such as ILO NORMLEX and NATLEX (information systems on international labour standards, national labour and social security laws, human rights issues). The highest scoring company from 2017 has maintained its high score, but has not been complacent and has revisited this section of its statement for 2019, including the development of a multi-language risk assessment tool used to gather information from agency workers. Data from this are then used in a related KPI.

At the other end of the spectrum are 40% of companies who neither described using risk appraisal as a tool nor identified areas of high risk in their business or supply chain. There is a danger therefore of little or wasted effort.

Measured effectiveness and performance indicators

This was by far the weakest area in statements. Very few companies discussed any approach to assessing the effectiveness of what they were doing to address modern slavery. In 2017, only two companies had included specific performance indicators and neither of these had any data to report or had set targets, as one would expect from performance indicators in corporate annual reports. Nearly 80% included nothing on this area.

The most improved statement, from an already above-average score of 16 in 2017 to 26 in 2019 (one of the best statements in the sector), is produced by a European-wide grower of salad and similar crops with a £50m turnover. The greatest improvement, albeit from a zero base, was in the area of measured effectiveness. Metrics over time are provided for KPIs covering, for example, audits of labour providers and employee awareness of modern slavery.

Effectiveness measures could relate both to modern slavery itself (the number of incidences found or notifications received through an internal reporting mechanism) or to the company's modern slavery policy and work, such as the proportion of its suppliers audited internally or externally, or the numbers of its staff who have received training on modern slavery.

Staff training

Again, there was a clear divide in the discussion of training. Companies with active training programmes in this area had differentiated training for different groups of staff (such as management, recruiters, operations teams), used company-wide awareness raising programmes, and gave detailed disclosure about their training programmes.

Many had become involved in Stronger Together, a multi-stakeholder initiative aiming to reduce modern slavery, which offers support and guidance and multi-lingual resources. Engaged companies extend their training provision to their supply chain. One of the highest scoring companies in this area had provided key members of staff with lead auditor training in SA8000, an international social accountability standard. But there are still nearly 30% of company statements which give little or no information about any training put in place.

Additional insights

In both 2017 and 2019, no conclusions could be drawn about the nature of the companies which prepared higher scoring statements. There was no meaningful correlation between quality of a statement and the size of the company. There was a weak correlation between quality and board approval in 2017, strengthening to a moderate correlation in 2019: the active involvement of the board or a named individual may be linked with better statements, but it could simply be that those preparing better statements have considered all aspects of the requirements, and those preparing weaker statements have not.

Those companies that were most engaged in 2017 were most likely to have revised their statements in 2018 and 2019. Possible quality scores range from 0 to 30: the average 2017 score of those who went on to be revisers in 2018 was 18.5 (well above the 2017 average of 13.0). In 2018, the revisers average increased to 19.7 (the average fell to 12.4), and to 20.1 in 2019 (when the average fell further to 11.3).

New engagers continue not to learn from the earlier engagers in their sector, nor from the additional time taken to engage: statements from new engagers in 2018 were almost all weak, with scores ranging from 5 to 16, an average of 8.8, with only one statement above the 2017 average of 13.0. The quality of statements of new engagers in 2019 was more erratic: scores ranged from 2 to 26, with an average of 9.8, again below the group average. With the new engagers producing relatively poor statements, and with only a quarter of 2017 statements and a third of 2018 statements being materially revised, the average quality score for the sector has fallen marginally year on year.

Conclusion

One year after the Act came into force, only half of the companies in the agricultural sector that were required to produce a statement had done so. Over the following two years, many more companies have now engaged, but the quality of statements is, on average, poor, and shows no sign of improving. Many statements are simply being replicated. While there are some companies who have fully engaged with the issue, and with reporting what they are doing, they remain a minority.

These results echo those found in other sectors and in other studies, despite agriculture being a high risk sector and the issue of modern slavery and human trafficking a growing one.

ⁱ International Labour Organisation. (2017). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Figure 9. http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf

ⁱⁱ Gangmasters & Labour Abuse Authority. (2018). The Nature and Scale of Labour Exploitation across all Sectors within the United Kingdom. <http://www.gla.gov.uk/media/3537/external-nature-and-scale-of-labour-exploitation-report-final-version-may-2018.pdf>

ⁱⁱⁱ Wilkinson, M. (2014). Demonising 'the other': British government complicity in the exploitation, social exclusion and vilification of new migrant workers. *Citizenship Studies*, 18(5), 499–515.

^{iv} IASC. (2018). Calling on FTSE 100 companies to combat modern slavery. Retrieved January 29, 2018, from <http://www.antislaverycommissioner.co.uk/news-insights/calling-on-ftse-100-companies-to-combat-modern-slavery/>

^v HM Government. (2019). UK Government Response to the Independent Review of the Modern Slavery Act 2015 <https://www.gov.uk/government/publications/government-response-to-the-independent-review-of-the-modern-slavery-act>

^{vi} [gov.uk/guidance/publish-an-annual-modern-slavery-statement#best-practice](https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#best-practice)

^{vii} [gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide](https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide)

^{viii} [corporate-responsibility.org/](https://www.corporate-responsibility.org/)

^{ix} [business-humanrights.org/en](https://www.business-humanrights.org/en)

^x [ethicaltrade.org/issues/modern-slavery/modern-slavery-resources](https://www.ethicaltrade.org/issues/modern-slavery/modern-slavery-resources)

^{xi} [ergonassociates.net/](https://www.ergonassociates.net/)

^{xii} [modernslaveryregistry.org/](https://www.modernslaveryregistry.org/)

^{xiii} [tiscreport.org/](https://www.tiscreport.org/)

^{xiv} <https://www.stronger2gether.org/>

^{xv} https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/803406/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf?_ga=2.83368661.213892906.1566658645-1058539684.1552387816

^{xvi} BBC. (2018). 1,500 companies miss gender pay deadline. <https://www.bbc.co.uk/news/business-43651780>

^{xvii} *Ibid.*

^{xviii} Home Office. (2015). Transparency in supply chains: a practical guide. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf



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