**Checklist and Audit Tool**

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| **STEPS TO TAKE:** | | * **Completed** | |
| **COMPANY STRATEGY** | |  | |
|  | Have you identified the high risk areas for modern slavery within your supply chains and business using the ‘Identify your Risk Area’ tool? |  | |
|  | Have you developed a strategy of the steps you will take to prevent modern slavery within your own business and supply chains in 6, 12 and 24 months? |  | |
|  | How will you measure how your organisation is performing against its objectives? |  | |
|  | What will be your strategy for dealing with non-compliance within the supply chain? |  | |
| **POLICIES, PROCEDURES AND PROCESSES** | |  | |
|  | Do you have a Modern Slavery Policy? |  | |
|  | Do you have an Anti-Bribery policy in place? |  | |
|  | Have you checked your existing policies to ensure they are consistent with your Modern Slavery Policy and strategy? |  | |
|  | Do you have a whistleblowing procedure in place which allows for suspicions to be raised concerning modern slavery practices without fear of retribution? |  | |
|  | Is your grievance procedure accessible and easy to understand? |  | |
|  | Do you have a process for completing a workplace investigation if issues are raised? Do you know when it is appropriate to report your suspicions to the authorities? |  | |
| **DIRECTOR RESPONSIBILITY** | |  |
|  | Have you appointed a senior individual to have responsibility for preventing modern slavery? |  |
|  | Has that person had training in modern slavery prevention and their responsibilities? |  |
|  | Is the Board aware of their responsibilities with regard to modern slavery? |  |
| **THIRD PARTY AGREEMENTS** | |  |
|  | Are you a signatory to any trade agreements on human rights, ethical trade and corporate social responsibility as part of a sector wide approach to tackling modern slavery? |  |
|  | Are you committed within a contractual agreement to undertake certain steps with regard to modern slavery prevention and detection? |  |
| **TRAINING AND DEVELOPMENT** | |  |
|  | Are colleagues appropriately trained on the signs of modern slavery, and what to do if suspicions arise? |  |
|  | Has the recruitment team had specific training in identifying the signs of modern slavery and their obligations? |  |
|  | Have security staff had training on identifying the signs of modern slavery? |  |
| **ENGAGEMENT** | |  |
|  | Have you engaged with your recognised trade unions? |  |
|  | Have you engaged with your professional or industry bodies or registered charities supporting the prevention of modern slavery? |  |
| **MODERN SLAVERY STATEMENT** | |  |
|  | Draft a statement within 6 months of financial year end. |  |
|  | Outline the steps taken this year and commitments for next year. |  |
|  | Liaise with PR. |  |
|  | Get Board and Director sign off. |  |
|  | Liaise with your website administrator to ensure there is a link on your website Home Page linking to a copy of the statement. |  |
| **PREVENTING MODERN SLAVERY WITHIN YOUR BUSINESS** | |  |
| **A** | **Workers’ Rights and Employee Welfare** |  |
|  | Do you work with a trade union body to ensure the proper treatment of workers? |  |
|  | Are you compliant with UK employment law? |  |
|  | Do your line managers regularly engage with workers and create time for welfare issues to be discussed and investigated? |  |
| **B** | **Recruitment** |  |
|  | Do you ensure that all the proper recruitment processes are followed even where you have colleague introductions? |  |
|  | Do you ensure that all workers have provided documentation evidencing their right to work in the UK from List A or List B before they start employment (this may not be the same day as they start work)? |  |

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| **C** | **Reporting** |  |
|  | Do you have a confidential hotline where employees can report abuse? |  |
| **D** | **Contractors** |  |
|  | Do you ask contractors to provide evidence of their right to work in the UK? |  |
|  | Do you set out your commitments to prevent modern slavery within those contracts? |  |
| **E** | **Colleague Awareness** |  |
|  | Do you display posters providing information on modern slavery for staff and contractors in prominent places? |  |
|  | Have you publicised within your business your modern slavery policy and colleague responsibilities? |  |
| **F** | **Indicators of Slavery** |  |
|  | Do you check your records to identify any high levels of occupancy at a single address? |  |
|  | Do you check your records to identify whether a number of unrelated people are using the same bank account number? |  |
| **G** | **Records** |  |
|  | Do you keep a record of suspected instances of modern slavery and have a process of escalation? |  |
| **H** | **Audit** |  |
|  | Do you regularly audit your own business processes to ensure their effectiveness? |  |
| **PREVENTING MODERN SLAVERY WITHIN YOUR SUPPLY CHAINS** | |  |
| **A** | **Supply Chains** |  |
|  | Do you have a satisfactory level of supply chain visibility? |  |
|  | Are your suppliers registered with a third party which completes checks before engagement? |  |
|  | Are your suppliers asked to evidence their commitment to preventing modern slavery? Do you do this by letter or within the contract? |  |
|  | Do you educate smaller suppliers about their responsibilities to prevent modern slavery? |  |
| **B** | **Labour Providers** |  |
|  | Do you ensure that any external recruitment provider is not charging work finding fees within the contractual agreement? |  |
|  | Do you ensure that your external recruitment providers are signed up to industry codes of practices and demonstrate a commitment to good recruitment practices? |  |
|  | If you use a labour provider to source or supply workers into the UK food and agricultural sectors, have you confirmed that the business holds a GLA licence and that the GLA Active Check is used? |  |
| **C** | **Audit** |  |
|  | Do you (or an appointed external audit service) regularly conduct audits of suppliers to check that signs of modern slavery are detected and employee welfare monitored? |  |