

Date: 21/01/2024

Attendees:

Emma-Jane Allen, Will Glover (Action Sustainability), Jo Potts (Balfour Beatty), Kimberley Gibson (Kier), Eliza Chanin (Reconomy), Rachael Burn (Mitie), Nikolaos Sapounas (Octavius), Jordanne Smith (Kier), Eva Juskova (Laing O'Rourke), Daphning Pierre (National Grid), Rebecca Lea (Willmott Dixon), Julie Swanepoel (Suez), Phillip Greenman (SKANSKA), Simon Stone (Galliford Try), Sara Robertson (RSK), Angela Hughes (Speedy Services), Amanda Parker (Yorkshire Water), Rebecca Winter (Amey), Anna Slatcher (Barratt), Justin Gilbert (Veolia), Matt Ansell (BU), Dominique Cooper-Richards (National Gas), Leola Luker (Veolia), James York (Costain), Clare Llewellyn (Kilnbridge), Jason Roberts (Mitie), William Brannan (Achilles), Jackie Cuthbert (Sunbelt Rentals), Rebecca Taylor (Alstom), Toni Birch (Briggs), Ben Frain (Arcadis), Nicola Andrews (Genuit Group), Sally Taylor (DEFRA), Julia Hellyer (B&K), Veleta Smith-Carter (Fortel).

Summary of actions & notes

Notes & Actions																						
No	Action/Note	Responsible																				
1	Agreed Workstreams from 25/26 Business Planning Session																					
	Budget allocated – £37,000*																					
	<table border="1"> <thead> <tr> <th>Agreed workstreams for 2025 - 2026</th> <th>Estimated budget</th> </tr> </thead> <tbody> <tr> <td>Development of modern slavery due diligence capability assessment and resulting ten-point action plan</td> <td></td> </tr> <tr> <td>Development of content, identify suitable resources, facilitate the working group of partner volunteers to peer review / input into the process</td> <td>£11,000</td> </tr> <tr> <td>Technology development (developer, QA, Project manager)</td> <td>£15,000</td> </tr> <tr> <td>Full day conference during or just after / before Anti Slavery week</td> <td></td> </tr> <tr> <td>Prep time to develop the agenda, identify speakers, speaker liaison, support marketing and events team to run, set up and attend the event</td> <td>£5,500</td> </tr> <tr> <td>Survivor with lived experience consultant, working with Align Ltd (they offer the opportunity to speak to a range of lived experience consultants and invite them to put forward proposals. Successful consultant is supported to help prep for the event. In 2024 this cost £2,300 including travel costs.</td> <td>£2,500</td> </tr> <tr> <td>Delivery of 4-6 webinars to showcase good practice on topics identified as priorities like auditing, right to work, due diligence - cost for delivery covered by wider School budget</td> <td>n/a</td> </tr> <tr> <td>Day to day running of the group and supporting collaborative initiatives (project management / prep / delivery / follow up for 4 virtual meetings per year (reduced from 5) and business planning process, collaborative initiatives would include helping drive forward the intelligence network, engaging on behalf of the school in other forums e.g. CCLA, BSA modern slavery council, RSSB modern slavery group etc)</td> <td>£12,470</td> </tr> <tr> <td>TOTAL cost</td> <td>£46,470</td> </tr> </tbody> </table>		Agreed workstreams for 2025 - 2026	Estimated budget	Development of modern slavery due diligence capability assessment and resulting ten-point action plan		Development of content, identify suitable resources, facilitate the working group of partner volunteers to peer review / input into the process	£11,000	Technology development (developer, QA, Project manager)	£15,000	Full day conference during or just after / before Anti Slavery week		Prep time to develop the agenda, identify speakers, speaker liaison, support marketing and events team to run, set up and attend the event	£5,500	Survivor with lived experience consultant, working with Align Ltd (they offer the opportunity to speak to a range of lived experience consultants and invite them to put forward proposals. Successful consultant is supported to help prep for the event. In 2024 this cost £2,300 including travel costs.	£2,500	Delivery of 4-6 webinars to showcase good practice on topics identified as priorities like auditing, right to work, due diligence - cost for delivery covered by wider School budget	n/a	Day to day running of the group and supporting collaborative initiatives (project management / prep / delivery / follow up for 4 virtual meetings per year (reduced from 5) and business planning process, collaborative initiatives would include helping drive forward the intelligence network, engaging on behalf of the school in other forums e.g. CCLA, BSA modern slavery council, RSSB modern slavery group etc)	£12,470	TOTAL cost	£46,470
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<p><i>*We have a budget shortfall of £9,470 – this is a result of the cost for the technology development of the due diligence assessment only just being confirmed and being significantly higher than estimated previously.</i></p>																						
2	Potential Savings																					
	Due to the budget constraints, we have to save £9,470 from the workstream shown above. The group was presented with 2 potential options of where the money could be saved.																					

	See section 2.1 and 2.2 for the 2 options.	
2.1	<p>Run a half day conference instead of a full day - <u>total savings: £6,500</u></p> <ul style="list-style-type: none"> • Half day would reduce cost needed from the venue and catering from a full day conference. (£2,500) • Less time/resource would be needed to develop agenda, speaker briefings/liaison etc. (£2,000) • Reduced time supporting the collaborative initiatives (£2,000) <p>However, there would still be an extra £2,970 needed to be saved.</p>	
2.1	<p>Run a virtual launch of the Due Diligence Capability Assessment – <u>total savings £8,460</u></p> <ul style="list-style-type: none"> • This would be INSTEAD of the half day face to face conference. • The virtual launch could be held during modern slavery week in October 2025 • There would be no budget for lived experience consultant (£2,500) • Less time/resource needed to prepare/develop agenda (£3,960) • Would assume 1 or 2 partner or member presentations • Reduced time supporting the collaborative initiatives (£2,000) <p>However, there would still be an extra £1,000 needed to be saved.</p>	
3	<p>What is the ‘Due Diligence Capability Assessment’?</p> <p>The ‘Modern Slavery Due Diligence Capability Assessment’ would be a similar assessment to the current ‘sustainability assessment’ available to members of the School in their company dashboard (see the below screenshot).</p> <p>The modern slavery due diligence assessment will be seamlessly integrated into our existing School platform, mirroring the familiar format and user experience of the Sustainability assessment, FIR assessment and other assessments. It will be accessible alongside other existing assessments on your dashboards (see the below screenshot). This approach ensures users are accessing expanded content in the trusted framework to which they are accustomed.</p> <p>The assessment will allow companies to understand more about good practice due diligence and help them to recognise their maturity and opportunities for improvement in different subtopics of modern slavery</p> <p>Example subtopics that align with the BS 25700 best practice framework could include; policy, risk assessment, procurement & supply chain etc.</p>	

Company assessments

Admins can complete confidential company assessments and create personalised action plans.

If the 'Assess' button isn't visible, request admin status through the **Our People** panel.

Assessment history

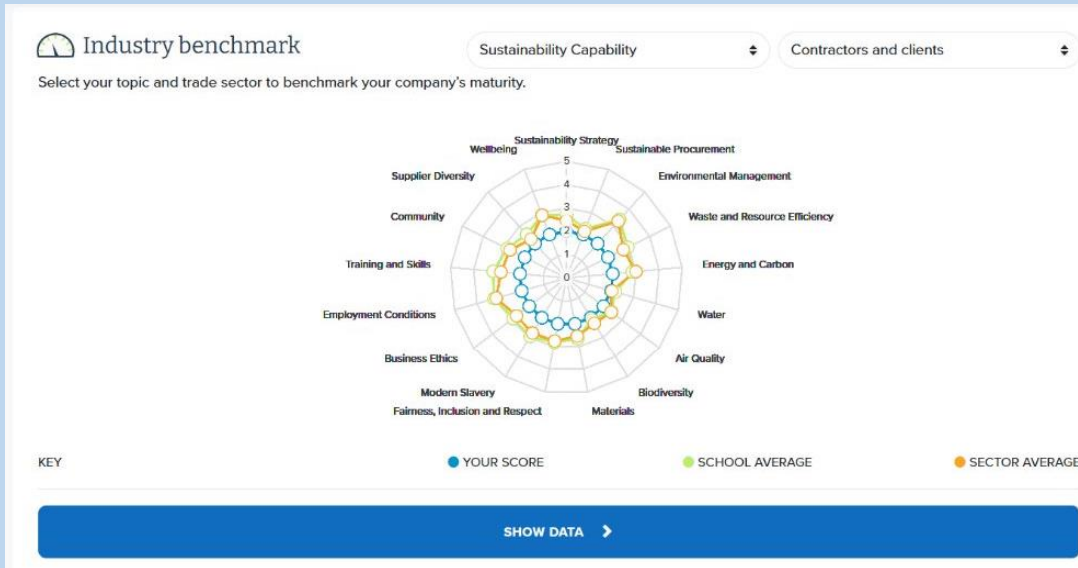
Assessment Type	Your Score	Baseline	Date	Action
Sustainability	3.29	2.00	2024-11-22	REASSESS >
Digital	2.57	3.38	2022-11-7	REASSESS >
FIR FIR	2.67	3.00	2024-10-31	REASSESS >
Lean	2.33	2.00	2024-10-25	REASSESS >
Management	2.58	2.58	2023-08-2	REASSESS >
National Highways	3.08	2.17	2025-01-21	REASSESS >
Offsite	2.40	2.00	2024-12-10	REASSESS >
People	3.63	2.75	2024-07-11	REASSESS >
Procurement	3.79	3.93	2021-09-17	REASSESS >
Retrofit	3.33	3.33	2024-10-8	REASSESS >

3.1

Outputs/Benefits of the 'Due Diligence Capability Assessment'

- The assessment will create a customised action plan that outlines key next steps and resources to enhance their modern slavery due diligence practices and overall maturity.
- A tailored modern slavery due diligence benchmarking spider chart on the company's School dashboard, outlining maturity level in each subtopic. See example below from sustainability assessment
- This will allow companies to compare their responses against peers and ALL School members

- The School and Partners can use the spider chart to pinpoint areas to target delivery of webinars and/or promotion of resources.



3.2 Proposed Methodology

Creation of a working group to:

- Meet 3 or 4 times
- Agree the sub-topics included
- Review and provide ongoing feedback to development team (EJ, Will, Anna)
- Help test and trial the tool with SME suppliers/sub-contractors

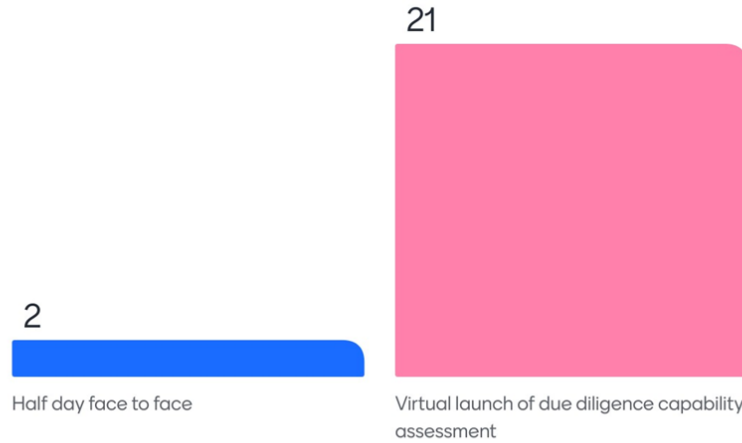
If you would like to be included in the working group and didn't react to Will's message in the team's chat, let Will know – will.glover@actionsustainability.com

All partners

Vote for 'Due Diligence Capability Assessment' OR Half Day Conference

A vote was held within the group for the option they would prefer and the favoured decision was to go with the virtual launch of the due diligence assessment. See the vote from the session below:

WHich would you prefer?



The plan would be to hold a full day face-to-face conference in April 2026 as part of the next financial year’s budget instead.

Action for EJ, make note to request face-to-face conference in April 2026

EJ

4 Webinar topics discussions

Each financial year, each leadership group is allocated a minimum of 4 webinar slots to run on topics relevant to the group. Using mentimeter, the group collected feedback on the different topics that Partners would most want to see delivered. See the below list for outline of the most popular topics:

- Right to work checks – it was decided that the focus would be from an employer perspective e.g. what to ask, how to request information, audits etc. This is instead of an employee perspective as the School wouldn’t be the best format for this type of webinar. It would be less likely that the relevant workers/operatives would join a School webinar.
- How to conduct supplier audits – both supplier and site audits
- Responding to modern slavery – response plans, initiating improvements and actions to your response plan, training colleagues on how to respond to concerns.
- Remediation – developing an effective remediation policy and/or plan.
- Escalation process – what to do when you expect something isn’t right, developing an escalation process
- Grievance mechanisms – embedding them into supply chains
- CSDDD and the supply chain

The School team will go away and put together a list of 4 topics to begin preparations of developing these webinars.

EJ

	<p>If members have any speaker suggestions for these webinars, please let Will or EJ know.</p> <p>Jo Potts has agreed to speak at a webinar around guidance for conducting supplier audits.</p>	<p>All partners</p> <p>Jo Potts</p>
<p>4.1</p>	<p>Learning Pathways discussion</p> <p>There was some further discussion around webinars not being relevant to all audiences and that learning pathways might be more relevant to workers on the ground. As part of the 24/25 financial business plans, there are plans in place to update the 3 current modern slavery pathways on the School as well as introduce 2 new pathways.</p> <p>There will no budget to develop new resources for learning pathways in the 25/26 financial year. Although, there is scope to develop learning pathways if all resources used in the pathway are already existing resources.</p> <p>Rachael Burn at Mitie said they are currently developing some learning pathways through their School partnership for their priority suppliers. She offered to share any details of this and what resources are being used to potential replicate these pathways for the wider School audience as well.</p> <p>Action for Rachael Burn, share the info around the pathways being developed with Will and EJ.</p>	<p>Rachael Burn</p>
<p>5</p>	<p>Breakout rooms – Sharing and collaboration</p> <p>The group was split into 3 different breakout groups and given an opportunity to discuss current challenges being faced, upcoming legislation, recent news and anything else relevant to modern slavery issues.</p> <p>See the following sections for an overview of what was discussed between each group.</p>	
<p>5.1</p>	<p>Group 1</p> <ul style="list-style-type: none"> Corporate Sustainability Reporting Directive (CSRD) – Recent EU legislation requiring companies to report on the impact of corporate activities on the environment and society. The group discussed the challenge related to getting SLT to buy into marking labour and human rights as a material risk under CSRD. Partners were looking for support around this. Another challenge discussed was around developing global minimum standards towards due diligence within an organisation. For example, Veolia are looking to standardise their review of vendors and their due diligence process across their global operations. Some geographies they operate in don't have as stringent legislation as others, so they are looking at how they can take good practice from elsewhere and bring it into these areas of their business. 	

	<ul style="list-style-type: none"> • News articles – the group discussed the recent developments with fast fashion company Shein. The company were looking to be listed on the London Stock Exchange and have been widely scrutinised after finding evidence of child labour in their supply chain in 2024 and refusing to answer questions from a British Parliamentary committee around their use of cotton from Chinas or the Xinjiang region. • The final challenge discussed was around the request for evidence-based partnership on modern slavery. Members discussed how some organisations were asking which modern slavery 3rd parties such as Unseen they are aligned with. . They mentioned how it feels there is almost a need for a ‘badge’ to demonstrate what you are doing to address modern slavery risk. Even if companies are able to achieve the requirements by themselves there is a risk that without this ‘accreditation’ they may miss out on market opportunities. 	
<p>5.2</p>	<p>Group 2</p> <ul style="list-style-type: none"> • Resources/links to help SMEs – partners were looking for support around finding these resources. If you are struggling to find resources, reach out to Will and he can signpost you to useful ones. There are lots of resources on the School and on the BEAS page, there is a search tool to help you find resources by specific topics. The BSA modern slavery council are also developing some guidance for SMEs in 2025. Unseen have developed some SME guidance as well, see here. • Responding to risks – there were discussions around when risks are found within a supply chain, what can be done to help mitigate these risks. The worst thing that can be done is to cut ties immediately with that organisation. You need to investigate, understand why that situation happened, did you organisation do anything that was somehow contributing to the problem. One of the questions raised here was ‘what does this investigation look like?’ – <i>if anyone has any examples or case studies of this, please share with the group.</i> • Global Risk Report 2025 – the newest report has been published recently. This resource is a great resource to help with the SLT buy in as it shows the interconnected nature of different risks across the ESG landscape. For example highlighting the link between climate change and modern slavery/human rights issues. • Terminology – there were discussions around the challenges of terminology. For example, it was noted that the term "modern slavery" may not resonate universally, particularly in the US. In the UK, there is a shift towards using terms like "labour exploitation" or "worker welfare". It could be that some workers or companies might dismiss the term ‘modern slavery’ and assume it won’t happen 	

	<p>on their site. Whereas some individuals experiencing exploitation may not identify themselves as victims of slavery.</p> <ul style="list-style-type: none"> • Heathrow modern slavery contract requirements – some members have been told they need to complete a risk assessment that is reviewed externally by organisations such as SEDEX/Achilles/Ecovadis. 	
<p>5.3</p>	<p>Group 3</p> <ul style="list-style-type: none"> • Partner organisations utilising their School workshops – if you haven’t already used your partner workshops for the year, look at using some for modern slavery. • CSRD and CSDDD - increase from customer and supply chain requests where they are subjected to both pieces of legislation to ensure that data available. • Contractual obligations on modern slavery – seeing more of these come through, largely being driven by MSAT improvements. There are also more tangible KPIs being introduced in modern slavery statements. • Institutional Shareholder Services (ISS) ESG disclosure – have added more human rights related questions, around 20 questions. This could have been driven by other investor disclosures or through CCLA benchmark. • Procurement Act – this is coming into play in February 2025 and includes the modern slavery mandatory exclusion criteria. This is to make certain modern slavery offences under the Act grounds for the mandatory exclusion of bidders from public procurements. • Bright Future – organisation that works with survivors of modern slavery are expanding their operations into Scotland in February 2025. • Further Shein discussions – ‘court of public opinion’. While the FSA were fine for them to join the London Stock Exchange, there has been clear and significant pushback from both the public and government. Suggests there have been a change of views and reputations are at greater risks if modern slavery issues not taken seriously. 	
<p>6</p>	<p>Promoting the webinars to colleagues / supply chain</p> <p>Why is this important?</p> <ul style="list-style-type: none"> • An email from yourselves to your supply chain or post on LinkedIn about these webinars is likely to have a much bigger impact than the School promoting them. • The webinars and training done through the School aim to upskill your colleagues and supply chain on modern slavery due diligence. The more of your colleagues and supply chain that join these webinars, the better equipped your organisations and suppliers will be to manage and mitigate the risks of modern slavery. 	<p>All partners</p>

	<p>The following 2 webinars were originally scheduled to be in late 2024, however, due to low registration numbers, they have had to be postponed until February and March 2025.</p> <p><u>Sign up and share these webinars!</u></p> <p>4th February 2025 - Unlocking the business case: Tackling modern slavery and labour exploitation</p> <p>12th March 2025 - Operational Toolkit: Combatting Slavery and Labour Exploitation</p> <p>Will has shared some suggested copy that you can use to promote the webinars to colleagues / supply chain.</p>	
<p>7</p>	<p>Useful links</p> <ul style="list-style-type: none"> • Global Risks Report 2025 - https://www.weforum.org/publications/global-risks-report-2025/ • Shein News Article - https://www.reuters.com/business/retail-consumer/shein-representative-declines-say-if-company-uses-cotton-china-uk-hearing-2025-01-07/ • Example of the cut and run approach and negative reputational risks https://www.abc.net.au/news/2024-12-15/sony-panasonic-accused-of-worker-exploitation-malaysia/104705876 • Link to Uyghur forced labour- https://www.theguardian.com/world/2025/jan/20/thousands-of-imports-enter-australia-from-companies-blacklisted-by-us-over-claimed-uyghur-forced-labour-links-ntwnfb 	
	<p>Next session</p> <p>4th March 2025 (9:30am-12:30pm) – Virtual on Teams</p>	