

# Modern Slavery Benchmarking Tool

## Performance Results and Recommendations

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**ID:** 90

**Country:** united-kingdom

**Industry:** property-construction

**Score:** 18

**Total possible score:** 30

**Referrer:** <https://www.google.com/>

**Report URL:** <https://cdn.walkfree.org/exports/modern-slavery-report-220720-100657-9107.html>

**Created at:** 2022-07-20 18:06:57

**Survey ID:** 24990

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**QUESTION:** Responsibility

How can we improve?

Adopt and publish policies that set out the organization's commitment to and principles/standards for addressing modern slavery. These may include:

- Human Rights Policy, Modern Slavery Policy and/or Forced and Child Labor Policy
- Ethical Recruitment Policy and/or Employer Pays Principle
- Procurement Policy and/or Supplier Code of Conduct (including provisions on modern slavery)
- Human Resources policies including complaints handling policy
- Grievance Mechanism and Whistleblower Policy
- Investment Policy or Framework
- Remediation Policy or Framework

**QUESTION:** Strategy

How can we improve?

Embed modern slavery policies into operational procedures and contractual provisions relating to:

- Your organization's workforce (HR policies, employment contracts, ethical recruitment policy);
- Suppliers, recruitment agencies and contractors (recruitment policies/Employer Pays Principle, procurement procedures, supplier code of conduct, contracts);
- Contractual provisions that, amongst other things, enable monitoring (e.g. audits, inspections, reporting of grievances) and require suppliers to assess their own suppliers modern slavery risk and commit to managing it.

Inform relevant departments (such as HR, Procurement, Legal and Risk) and all suppliers and other business relationships (such as joint venture partners) of modern slavery policies, procedures and contractual provisions. Conduct training for current employees and suppliers, and as part of employee induction or supplier onboarding to increase awareness and improve compliance.

Establish a monitoring framework and process to track implementation and develop responses and remedies for breaches such as Self-Assessment Questionnaires, audits and inspections, worker and supplier engagement, and corrective action plans.

**QUESTION:** Policy Commitment

How can we improve? Not Applicable

QUESTION: Policy Implementation  
How can we improve? Not Applicable

QUESTION: Reporting  
How can we improve?

Identify the specific type of modern slavery risks if possible (such as forced labor, child labor, debt bondage, deceptive recruitment practices, etc), where it occurs in your operations and value chain, what its relevant indicators are (such as loss of freedom of movement, failure to check worker age, payment of recruitment fees, or complaints about contract substitution, etc), and whether you cause, contribute or are directly linked to the risk.

Prioritize the salient risks in your modern slavery risks for attention based on severity and likelihood:

- Assess the severity of the impact on the people affected, considering how grave the impact would be, how widespread (i.e., how many people would it affect) and how hard it would be to remediate the resulting harm; and,
- Consider the likelihood of risk occurring (noting that the most severe risks should be prioritised even if there is a low likelihood of occurring).

QUESTION: Risk Assessment  
How can we improve? Not Applicable

QUESTION: Our Employment Practices  
How can we improve? Not Applicable

QUESTION: Supplier engagement and due diligence  
How can we improve? Not Applicable

QUESTION: Purchasing practices  
How can we improve? Not Applicable

QUESTION: Grievance mechanisms  
How can we improve?

Establish a grievance /complaints process (grievance mechanism) communicated to internal and external stakeholders that meets the following standards:

- It can be used to receive, resolve and remedy labor exploitation and modern slavery-related complaints; and,
- It is effective; i.e., it is accessible, predictable, fair, rights-based, transparent, confidential or anonymous, and it bans retaliation or reprisal. Consider whether parties know the mechanisms exists, can access it in their own language and can raise grievances anonymously.

Consider involving external stakeholders in its design and communication such as suppliers, workers and civil society organizations.

QUESTION: Response and Remediation  
How can we improve? Not Applicable