
SUMMARY

OXFAM GB STATEMENT ON MODERN SLAVERY

For the financial year 2015/16



The UK's Modern Slavery Act 2015 requires organizations with an annual turnover of at least £36m to make a public statement on steps they are taking to identify and prevent modern slavery in their operations and supply chains. Oxfam GB advocated for this policy development, and this statement relates to steps taken in relation to our own operations and supply chain. We have opted to share detailed information about our current approach in order to demonstrate transparency on this challenging issue and to encourage greater transparency by others.

SIGNED BY MARK GOLDRING, CEO, OXFAM GB

The full statement can be downloaded from www.policy-practice.oxfam.org.uk

FOREWORD

The abolition of slavery in Britain occurred more than 200 years ago. Yet in 2015 the UK government was so concerned about slavery in the UK and in the overseas supply chains of UK companies that it passed the Modern Slavery Act, a testament to the severe exploitation of the weak by the strong made possible by today's global trade system.

Oxfam GB was one of a number of NGOs which worked in a coalition with trade unions, companies and investors, led by the Ethical Trading Initiative (ETI), to advocate to the UK government that mandatory disclosure by companies was the way forward.¹ The Act requires UK organizations with a turnover of £36m or more to report on the steps they are taking to ensure that modern slavery is not taking place in their operations and supply chains. This includes Oxfam GB.

For the Act to have a positive impact, organizations must address in their written statements the fundamental question: 'How are our operations or relationships with business contributing to the risk of modern slavery?' Given that slavery is such a difficult and a largely hidden issue, this is extremely hard to do. Oxfam GB has had a programme for addressing labour rights in its supply chain for almost 20 years, but has not until now focused on the specific risks of modern slavery whether in our supply chain or our own operations.

The Act highlighted the need for us to develop our work on labour standards and take on board known risk factors for modern slavery, which include social factors (such as poverty and migration, especially in countries with poor governance) and factors in the business model, such as short-term supply relationships lacking trust, parties in the supply chain earning very low margins and agency labour involving recruitment fees.

To date we have found no instances of modern slavery in our operations or supply chain. However, the limitations in our approach do not yet enable us to say unequivocally that there are no such instances occurring.

We have chosen to structure our statement in accordance with the guidance provided by CORE² Coalition, a civil society coalition that works to advance the protection of human rights and the environment with regard to the global operations of UK companies. CORE has critiqued the published statements of UK companies to date,³ and has concluded that most are flawed and disclose too little meaningful information to assess their approaches.

Oxfam GB has therefore opted to share detailed information about its current approach in order to demonstrate its commitment to transparency and to encourage greater transparency by others.

In this first report, we are very aware that this statement falls well short of being an example of good practice. There are gaps in visibility of our supply chains and limitations in the tools used to identify and address risks to workers. We recognize we have work to do to review and address the risks in the countries where Oxfam GB has humanitarian or development programmes. We have sought to be open about these gaps, and we commit to learn and improve our practice over time and to report progress and challenges annually. We welcome feedback from those with expertise on these issues about ways in which our approach could be strengthened.

Mark Goldring, CEO, Oxfam GB, September 2016

SUMMARY

The Modern Slavery Act 2015 is among the first pieces of legislation in the world designed specifically to tackle modern slavery. It requires UK organizations with an annual turnover of £36m or more to report on the steps they are taking to ensure that modern slavery is not taking place in their operations and supply chains, and to have the report signed off by a CEO or senior director and published with a link to the home page on its website. This includes Oxfam GB.

During the passage of the Modern Slavery Bill, the Ethical Trading Initiative (ETI), of which Oxfam GB is a member, convened a coalition of NGOs, trade unions, companies and investors and the British Retail Consortium to advocate to the UK government that mandatory, rather than voluntary, disclosure on company supply chains was the way forward; this resulted in the Transparency in Supply Chains clause being included in the Act.⁴ Oxfam GB added its voice to this advocacy.

Modern slavery encompasses a spectrum of labour exploitation. Slavery, human trafficking, the worst forms of child labour and forced sexual exploitation fall at the severe end of a spectrum. But modern slavery issues are inextricably linked to other issues of labour exploitation, and need to be tackled as part of a holistic corporate responsibility strategy. In this first public report, we therefore share our overall approach to addressing labour standards, along with an overview and specific examples of the work we are doing, for instance in relation to involuntary overtime, sexual exploitation, low wages and worker representation. This holistic approach provides the foundation on which we will build a more robust approach to identify and address the risk of modern slavery.



One of a series of posters produced for staff by Oxfam's Safeguarding team, 2015.

Table 1: Risk factors for modern slavery and Oxfam GB's approach⁵

Known risk factors for modern slavery	Oxfam GB's strengths	Oxfam GB's gaps	Oxfam GB's commitments
Poverty and migration, especially in countries with poor governance	Understanding of developing countries and holistic approach. Advocacy on labour issues in supply chains	Our UK procurement teams' sourcing frameworks need strengthening to ensure these risk factors are better integrated. We have not yet assessed risks in our humanitarian and development programmes or in developing country-based procurement	Revise the UK procurement framework informed by the ETI's Due Diligence Framework. Extend risk assessment and visibility to our international programme operations and procurement
Disempowered workers keep silent about exploitation because workers are unable to organize and grievance mechanisms are not trusted. Gender inequality compounds this for women workers.	Recognition, information and consultation agreements with the Oxfam Joint Trades Union Shop (OJTUS) for UK staff. We also have agreements with a number of staff associations for staff outside the UK. Staff grievance mechanisms reviewed in 2015.	Many of our suppliers' workplaces are not unionized, particularly in developing countries, and Oxfam lacks leverage to influence this	Work with a trade union specialist on ways to remove barriers to worker representation in our supply chain, including in areas where there is a risk of modern slavery. We will also ensure gender analysis is integrated into our approach
Agency labour involving recruitment fees	95 percent of our staff in the UK are hired directly by Oxfam and we are not aware of any Oxfam GB workers based in developing countries who are employed through agencies.	Inconsistent checks for Oxfam GB's UK agency workers. We cannot categorically confirm there are no agency workers in our programme work	Ensure that risks around the 5 percent contingent labour in UK are carefully managed Conduct a risk assessment as to confirm if Oxfam GB uses contingent labour in our programme work
Short-term supply relationships lacking trust	We seek long-term relationships with suppliers, which are chosen through competitive tendering processes with ethical criteria	Some short-notice sourcing, e.g. for humanitarian response programmes and low value contracts. Variable supplier awareness about modern slavery	Targeted supplier workshops and ongoing collaboration
Historic under-reporting of serious systemic issues including slavery and sexual exploitation and abuse.	Transparency and disclosure of serious issues and how Oxfam identifies and tackles them.		Continued work in this area

Governance

The most relevant Oxfam GB policy on modern slavery is our corporate Ethical and Environmental Policy,⁶ which in 2013 brought together into a single policy our social and environmental standards covering both operations and supply chain procurement. The policy includes the ETI Base Code,⁷ the first element of which is that 'Employment is freely chosen'. The policy explicitly acknowledges the potential link between purchasing practices and labour standards.

Responsibility for the policy sits with Oxfam GB's Head of Corporate Responsibility who is supported by a Steering Group of senior personnel. There is a devolved corporate responsibility model, in which operational and procurement teams are responsible for meeting Oxfam GB's commitments, with responsibilities embedded in organizational processes.

Accountability to assess, monitor and improve labour standards in our supply chain sits with the procurement teams and their management lines. Emphasis is placed on understanding by procurement staff of ethical issues, and developing tools which enable them to address labour risks and issues appropriately.

In recognition that modern slavery is often hidden and very difficult to identify, in 2015/16 we gave priority to building awareness of the issue among senior management staff and relevant functions, particularly procurement. The Corporate Responsibility Steering Group took part in a training session on modern slavery in March 2016. Twenty-eight personnel from across Oxfam GB – from Procurement, Human Resources, Retail, Logistics, International, and Campaigns, Policy and Influencing teams, the Independent Oxfam Union, the Finance and Trading directors, the Deputy CEO, and the CEO – were involved in developing this statement.

Operations

Oxfam GB has 2,067 employees in the UK and a further 3,139 based overseas. The greatest risks of modern slavery relevant to Oxfam's operations lie in countries with high levels of poverty and migration, particularly fragile states with weak governance. We have not yet undertaken a full assessment of the risks of modern slavery in relation to our operations in developing countries, but commit to develop the risk framework by November 2017 and conduct the assessment by March 2019.

A particular area where vigilance is needed is sexual exploitation and abuse which may be perpetrated by Oxfam staff and partners. We are committed to transparency on this issue, and in 2015/16 the number of reported allegations increased from 26 to 64. Cases of sexual exploitation and abuse can fall under the category of Modern Slavery, in particular in cases where a person has been forced into performing sexual acts for another; however none of the cases reported to Oxfam fall under this category.

Under-reporting is recognized within the sector as the major barrier to tackling sexual exploitation and abuse in delivering humanitarian and development programmes. By establishing a dedicated Safeguarding team we have raised the visibility of our Protection from Sexual Exploitation and Abuse policy and reporting procedures. We believe that the overall increases in the number of allegations that we have seen in recent years show that we are improving awareness of this important issue and giving victims more confidence to report incidents.

We recognize that workers through sub-contracted, agency or other third-party hiring arrangements are more vulnerable to exploitative practices. In the UK, all but five percent of UK staff are directly employed. Our processes in the UK are designed to limit such arrangements to short-term or sporadic staffing needs. For our contingent,(contracted through agencies) workers, with the exception of the below mentioned category, we can confirm that contracts do

not allow for fines to be imposed upon workers; passports are copied and not retained; and information is provided to workers about their rights in a language they understand. We have identified one category of contingent workers (drivers, operations and warehouse staff) where there is a gap in our processes in terms of ensuring that agencies undertake appropriate checks, so we have set an action to rectify this.

We are not aware of any staff based overseas being recruited through agencies, but will check that this is correct as part of our commitment to assess risk in our international operations. Staff involved in recruitment are expected to attend a Recruitment and Selection course which includes diversity and right to work processes; Human Resources (HR) personnel check and maintain a record of all employees' proof of their right to work, to prevent the employment of illegal workers; and we have a range of policies relating to employees, including policies on grievances, disclosure of malpractice in the workplace, incident reporting, child protection, prevention of sexual exploitation and abuse, and complaints.

We fully recognize the importance of freedom of association and the right to collective bargaining to enable workers to realize all their rights, which is a known factor in the prevention of forced labour. We have a recognition, information and consultation agreement with the Oxfam Joint Trades Union Shop (OJTUS), which includes Unite and the Independent Oxfam Union representing UK workers. We encourage staff outside the UK to join a union or set up staff associations. We have agreements with a number of these.

We place a high priority on ensuring that employees can make their voices heard, including via a 24-hour confidential counselling and support line for all staff and confidential staff surveys. Grievance processes are based on the Advisory, Conciliation and Arbitration Service (ACAS) guidelines and were reviewed recently in consultation with the OJTUS.

Oxfam GB has been an accredited Living Wage Foundation⁸ employer (a scheme open to UK-based employers) since 2013. The scope of accreditation includes all agency workers and on-site services. We also have a commitment to paying a living wage to international staff in our programme countries.

There are many other staff engagement opportunities, from confidential 'chat with CEO' slots every 6–8 weeks to a Women's Leadership Network that was established in January 2015 to enable women's leadership and influence at all levels within Oxfam GB.

Supply chains

Oxfam GB's supply chains comprise retail New Products (from handcrafts to Christmas cards), UK-sourced (UK-sourced is used to mean sourced through Oxfam GB's UK procurement teams) indirect goods and services (from utilities to promotional items), UK-sourced humanitarian supplies (from tents to latrines) and procurement managed from 51 developing countries (from chickens to fuel), which includes sourcing for emergencies and in fragile countries. We have added the risk of modern slavery in our supply chain to the procurement risk register for 2016/17.

Our supply chain due diligence covers goods and services sourced by our UK-based teams and is not limited solely to products for retail. Where our spend is above £50,000, we also undertake competitive tendering processes, and any deviation from these processes requires a derogation from the Head of Procurement. Selection of suppliers is based on a balanced scorecard covering quality and delivery, value for money and corporate responsibility factors (social and environmental). Although our New Products (retail) team applies our due diligence framework to all suppliers, given the wide range of products and services we source through central and humanitarian procurement, we have developed a targeted framework in which only high risk or high spend suppliers (over £50,000) are within scope for due diligence. We have a limited due diligence process for our international programme procurement. This will be reviewed as part of our commitment to assess risks in our international programme

The Corporate Responsibility team works closely with procurement managers to ensure that they understand the risks both to Oxfam GB and to workers and build them into their category plans. We take into account purchasing practices, levels of unionization, skill levels in the workplace, national context and levels of outsourcing. A frequent challenge is our low degree of leverage to influence suppliers to maintain the labour standards we are looking for. We seek to maximize this influence through long-term stable mutually beneficial supplier relationships and take steps to reduce last-minute sourcing, which is known to introduce risks that are hard to manage. For instance, 40 percent of New Products suppliers have contracts running for more than three years and 30 percent of our Humanitarian suppliers have worked with us for over 20 years.

We have a longstanding commitment to Fair Trade, and over 50 percent of our retail suppliers supply Fairtrade-certified products or are based on the World Fair Trade Organization (WFTO) fair trade principles. We recognize that buying Fair Trade products does not remove the need for due diligence by Oxfam, but does provide a measure of assurance.

We ensure prompt payment on reasonable payment terms, generally 30 days, to minimize the risk that workers' employment terms could be negatively affected by our business practices.

In 2015 we hired a trade union specialist to identify where we could do more to enable freedom of association and collective bargaining in our supply chain.

In 2016 we undertook an assessment of the strengths and weaknesses of the different tools to assess labour standards including modern slavery, balanced with our leverage to agree the most appropriate way forward. These tools include supplier self-assessment questionnaires, audits, in-depth site assessments, continuous improvement programmes at supplier sites and consultation with trade union representatives.

Oxfam GB identified three active and one potential UK supplier, each with a UK site whose employment contract includes an obligation for shift workers to work overtime when required, a practice which is permitted under UK law. In each case, Oxfam GB followed up to understand whether overtime had been required, initiated a meeting with senior management to explain the importance of the issue for workers and agree appropriate action, and offered training and support.

Gaps and commitments

This year's statement is based primarily on the due diligence frameworks that Oxfam GB adopted in 2013 and 2014, before we took on board an explicit focus on modern slavery and its inter-relationship with labour issues such as precarious work and low wages. In May 2016 the ETI published its human rights due diligence framework,⁹ the output of a working group involving trade unions, NGOs and companies. We will use this framework from now on to inform our approach. For this year's report, we have mapped our current approach against the ETI's nine core principles and identified a range of gaps; in light of this we will revise our due diligence approach, informed by the ETI framework. See section 4, actions planned, for more information.

We recognize the need to assess risk, particularly in countries that we work in which have a higher risk of slavery; this was one of the issues highlighted to us in feedback on our draft statement from Anti-Slavery and ITUC. This is a complex task across a number of countries and therefore needs the time and training to enable an effective framework. We have therefore made a commitment to develop a framework for assessing risk by November 2017. Through our campaigns, policy and influencing work we raise awareness of the issues of labour exploitation, including modern slavery. However, we will do more in this area and will continue to collaborate with other NGOs, trade unions, companies and investors to ensure that Oxfam GB plays a role in achieving positive change for those who are systematically exploited and oppressed, and to ensure that we are putting these principles into practice in our own organization.

MODERN SLAVERY

No organization wants to find modern slavery in its supply chain, let alone in its own business. With its mission to overcome poverty and suffering, Oxfam Great Britain is concerned about the issue both as a development organization and as an organization which itself has complex operations and supply chains. A survey of major UK companies by the Ethical Trading Initiative (ETI) found that 71 percent of firms questioned believed that there was a likelihood of modern slavery occurring in their supply chains, particularly in high-risk countries or sectors and at the lower stages of the chain.¹⁰

What is the issue?

Slavery is a situation where a person exercises (perceived) power of ownership over another person. The term 'modern' is used to distinguish the phenomenon from historic slavery associated with the legal possession of one person by another. Related terms include forced labour, which covers work or services that people are not doing voluntarily but under threat of punishment; human trafficking, which involves deceptive recruitment and coercion; and bonded labour, which is demanded in repayment of a debt or loan.

Globally, at least 21 million men, women and children are in some form of slavery, according to the International Labour Organization (ILO). By gender this breaks down to 11.4 million women and girls and 9.5 million men and boys.¹¹ Of the 21 million, the ILO estimates that 10.7 million are victims of labour exploitation in private enterprises in the agriculture, manufacturing, construction, mining and utilities sectors; between them generating \$43.4bn in illegal profits per year.¹² Modern slavery encompasses a spectrum of labour exploitation. Slavery, human trafficking, the worst forms of child labour and forced sexual exploitation fall at the severe end of a spectrum. But modern slavery issues are inextricably linked to other issues of labour exploitation, which involves vulnerable workers being mistreated by those with power over them.

Slavery can be found in many ordinary workplaces: on farms, in factories, in private homes and in ancillary services; generally in undeclared or clandestine jobs. Well publicized cases include Thai seafood (migrant male sailors), Indian cotton (teenage girls working in mills), Malaysian electronics (migrant workers) and the Assam tea industry (teenage girls trafficked to domestic servitude).¹³

In the UK, the Home Office estimates that 10–13,000 people are trapped in modern slavery at any one time.¹⁴ More than 3,000 people, including nearly 1,000 children, were referred to British authorities as potential victims of slavery in 2015, a 40 percent increase on the previous year. They came from 112 countries of origin, the top five being Albania, Nigeria, Vietnam, Romania and the UK itself. They include recent cases in the factories and fields of the UK, including a mattress factory near Leeds, chicken farms in Kent and leek fields in Lincolnshire. Many involve vulnerable migrant workers, often illegal, but cases also include UK citizens both as victims and as exploiters, for instance in Wales and Manchester.¹⁵

What are the root causes of modern slavery?

The root causes of modern slavery lie in a combination of political, social and economic factors. It is a political issue, in that it is about power and exclusion from power, and touches on some of the most disputed areas of international law and policy. It is a social issue in that prejudice and discrimination against certain groups on the basis of caste, ethnicity, gender or religion allow the more powerful to exclude the more vulnerable from the processes of development and make them more vulnerable to slavery. And children are more vulnerable than adults everywhere.¹⁶

According to the director of Anti-Slavery International, 'slavery emerges at the conjunction of three common factors: individual vulnerability, usually, but not exclusively as a result of poverty; social exclusion; and failure of rule of law.'¹⁷

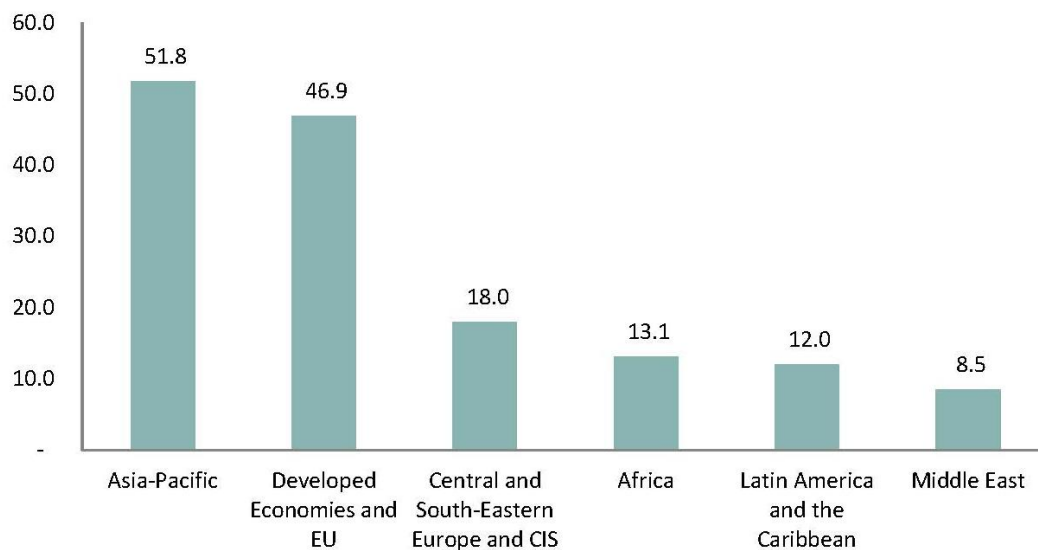
As Oxfam GB has argued in briefing papers¹⁸ and articles¹⁹ on labour issues in global supply chains, modern slavery is also a symptom of a wider malaise in workplaces across continents as governance gaps and skewed business models allow forced labour and poor quality jobs to thrive.

Governance gaps have opened up because we have a global system of production and trade without global protection for workers. Even countries where there are known problems, such as Uzbekistan and Turkmenistan, are able to take part in the trade system; these countries are the world's fifth and seventh biggest cotton exporters respectively.²⁰

Gender inequality and gender norms influence the type of slavery that women and men are subjected to, for example women may be concentrated in sexual exploitation and men more vulnerable to forms of bonded labour in certain contexts. The vast majority of the 4.5 million people who are victims of forced sexual exploitation are women.²¹ Sexual exploitation and abuse is a systemic issue affecting vulnerable people in all countries and sectors, including the development sector. Sexual exploitation happens on a continuum involving the exploitation of those more vulnerable by those who have power over them.²² Sexual exploitation comes into the definition of modern slavery, where some individuals are forced by others to carry out non-consensual sexual acts for them. These cases often involve trafficked people.

Skewed business models also play a key role. Multinational companies owned by shareholders work to extract maximum profit in the short term, while externalizing negative impacts onto society and the environment. This gives rise to desperate economic conditions that open the door to exploitation, including modern slavery. The right hand (the corporate social responsibility (CSR) activity, the policy statements) gives the appearance of working to reduce the problem, while the left hand (the brutal exercise of commercial power, hard negotiation on prices and trading terms) generates the conditions in which forced labour emerges.²³

Figure 1: Annual profits from forced labour per region (US\$)



ILO. 2014. 'Profits and Poverty; The economics of forced labour'²⁴

Why is it so hard to detect and address?

Slavery frequently involves organized crime groups systematically exploiting large numbers of individuals by coercing them into a life of abuse and degradation. The general approach to improving labour standards is predicated on there being sound reasons for better standards. In the case of slavery, this approach is not effective: criminal actors may be seeking to maximize illegal profits.

Monitoring systems which rely on highly vulnerable workers reporting issues themselves are known to be flawed. Audits can provide a helpful snapshot and be an input to risk assessment;

but they do not address the root causes of why abuses occur. Traditional audits have even less effectiveness in identifying slavery than other issues, since criminal perpetrators make every effort to conceal it.

What is needed, moving forward?

Oxfam GB's own expectations of companies are that they use a two-pronged ethical trade strategy in order to ensure that their efforts help to create positive change, whether in relation to modern slavery or other areas of labour exploitation such as low wages, precarious work, deficiencies in freedom of association and gender inequality. This strategy should include companies:

- **Addressing the issues in companies' own operations and supply chains**, prioritizing those most salient to workers, taking into account the national context and the company's commercial leverage, drawing on available good practice frameworks and avoiding an over-reliance on audits and compliance;
- **Identifying the root causes of labour abuses, and tackling the systemic issues which keep workers poor**, in order to 'change the playing field' and not just tackle the symptoms. This may include collaboration with peers and other supply chain actors; advocacy to governments to protect human and labour rights; changing business practices and even business models that hinder human and labour rights; and removing barriers to worker representation and gender equality.

Oxfam GB's Corporate Responsibility team focuses on the first element of this approach (see case study 1) while the Campaigns, Policy and Influencing team focuses on the second element of this approach (see case study 2).

Case study 1: Addressing the issues in companies' supply chains

When tendering for a supplier of promotional goods (e.g. tee-shirts, wristbands), Oxfam GB looked for a sourcing partner that could implement a progressive ethical sourcing programme. If a suitable partner could not be found, then it was agreed that we would reduce our promotional offer, and source and manage ethical issues directly. We included the following questions in our Invitation to Tender (ITT).

- Oxfam GB is interested in supporting its suppliers to develop an ethical trade 'beyond audit' approach which reduces audit duplication and enables sustained change for workers. We encourage suppliers to apply combined leverage and standards to create a simple, more impactful approach. Is this something you would be interested in developing?
- Is your company intending to develop a 'beyond audit' programme to support suppliers to make sustained changes to improve their ethical practices?
- Can Oxfam GB products be sourced from sites where you have sufficient leverage to adopt this approach?
- If you do not have a team on the ground in the countries where you work, how would you deliver this, support manufacturing sites and monitor progress?
- Please specify which items/categories you would be sourcing through an agent, based on order value and/or lead time.
- When you are sourcing through an agent, how do you ensure that your/our ethical and environmental standards are met throughout the supply chain?
- Please provide details of customers you work with who are asking for enhanced ethical checks or additional information, over and above identifying the source and/or country of origin, and give details of what they ask for and/or what you provide.

Shortlisted companies were invited to present to the Head of Corporate Responsibility, Corporate Responsibility Manager and Category Manager, who then visited the potential promotional suppliers' sites.

The tender was awarded at the end of March 2016, to The Sourcing Team and we have begun work with them to support their development of a progressive 'beyond audit' approach with their supply base. We are focusing on ways to increase freedom of association where possible to enable independent, democratic worker representation in the process.

Case study 2: Identifying the root causes of labour abuses, and tackling the systemic issues which keep workers poor



Our Campaigns, Policy and Influencing team undertakes research and advocacy on labour issues in global supply chains in order to understand and tackle the systemic issues which keep workers poor and to 'change the playing field'.

We have highlighted in a range of publications the systemic nature of labour issues in global supply chains and have pointed towards solutions, most recently the briefing papers *In Work But Trapped in Poverty*²⁵ and *Steps Towards a Living Wage in Global Supply Chains*,²⁶ an article on *What would loosen the roots of labour exploitation in supply chains?*²⁷ and a study on poor quality jobs in Scotland, *Decent work for Scotland's low paid workers: a job to be done*.²⁸

We engage with companies, suppliers, certification organizations and others on good practice based on Oxfam GB's research, programme experience and expertise, for instance working with Unilever on its management of labour rights in Vietnam²⁹ and engaging investors on the issues of a living wage and growing economic inequality.³⁰

We highlight the role of governments to protect human and labour rights and engage companies and other NGOs in advocacy towards governments. For instance, we initiated advocacy by ETI towards the Myanmar government on the minimum wage to protect 300,000 garment workers from in-work poverty.³¹

The fight against modern slavery is going to take an approach that is very different from corporate responsibility 'business as usual'. The new legislation is a welcome step, but for it to be effective organizations of all kinds will need to take on board the root causes of the issue and embed a more effective approach; and this includes Oxfam GB.

NOTES

All websites were accessed in September 2016 unless otherwise stated.

- 1 Modern Slavery Act 2015 <http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>
- 2 CORE (2016) 'Beyond Compliance: Effecting Reporting Under the Modern Slavery Act', London: CORE Coalition, http://corporate-responsibility.org/wp-content/uploads/2016/03/CSO_TISC_guidance_final_digitalversion_16.03.16.pdf
- 3 http://corporate-responsibility.org/wp-content/uploads/2016/03/CORE-BHRRRC-press-release_modern-slavery-statements_160307_.pdf
- 4 ETI (2014) 'Modern Slavery Bill: the Power of Collaboration' <http://www.ethicaltrade.org/blog/modern-slavery-bill-power-collaboration> and ETI (2015) 'Welcoming the Modern Slavery Act 2015' <http://www.ethicaltrade.org/blog/welcoming-modern-slavery-act-2015>
- 5 Table developed by Oxfam from a range of sources
- 6 Oxfam GB (2015) 'Ethical and Environmental Policy' <https://www.oxfam.org.uk/~media/Files/OGB/What%20we%20do/About%20us/Plans%20reports%20and%20policies/Supplier%20Information/ethical-and-environmental-policy.ashx>.
- 7 ETI Base Code <http://www.ethicaltrade.org/eti-base-code>
- 8 <http://www.livingwage.org.uk/>
- 9 ETI (2016) 'Human rights due diligence framework' <http://www.ethicaltrade.org/resources/human-rights-due-diligence-framework>
- 10 Q. Lake, J. MacAllister, C. Berman, M. Gitshaw, N. Page (2015) 'Corporate Approaches to Addressing Modern Slavery in Supply Chains: a snapshot of current practice', London: Hult International Business School and ETI
- 11 ILO (2016) 'Forced labour, human trafficking and slavery' <http://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>
- 12 ILO (2014) 'Profits and poverty: the economics of forced labour'. http://www.ilo.org/global/topics/forced-labour/publications/WCMS_243027/lang--en/index.htm
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http://www.antislavery.org/english/slavery_today/slavery_and_what_we_buy/sumangali.aspx;
<https://www.theguardian.com/global-development/2014/mar/02/tea-workers-sold-into-slavery>
- 14 UK Home Office. 2014. <https://www.gov.uk/government/news/true-scale-of-modern-slavery-in-uk-revealed-as-strategy-to-tackle-it-published>
- 15 UK Government Home Office and The Rt Hon Karen Bradley MP (2014) 'True scale of modern slavery in UK revealed as strategy to tackle it published', UK Government, 1 December 2014, <https://www.gov.uk/government/news/true-scale-of-modern-slavery-in-uk-revealed-as-strategy-to-tackle-it-published>; National Crime Agency (2014) 'National Referral Mechanism Statistics 2013', National Crime Agency, 18 February 2014, <http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics/139-national-referral-mechanism-statistics-2013>; 'Dewsbury bed factory run on 'slave workforce'', 2015, BBC, 7 October, <http://www.bbc.co.uk/news/uk-england-leeds-34468745>; F. Lawrence (2016) 'Lithuanian gangmasters jailed in modern slavery and trafficking case', the Guardian, 22 January, <https://www.theguardian.com/uk-news/2016/jan/22/lithuanian-gangmasters-jailed-in-modern-slavery-and-trafficking-case>; R. Hastings (2010) 'Waitrose and Tesco sold leeks picked by 'slaves', court told', Independent, 8 December, <http://www.independent.co.uk/news/uk/crime/waitrose-and-tesco-sold-leeks-picked-by-slaves-court-told-2154058.html>; 'Modern slavery' family jailed for Cardiff forced labour' (2016), BBC, 24 May, <http://www.bbc.co.uk/news/uk-wales-south-east-wales-36332024>; C. Cox (2014) 'Shock figures show rise in modern-day slavery in Greater Manchester', Manchester Evening News, 12 December, <http://www.manchestereveningnews.co.uk/news/greater-manchester-news/shock-figures-show-rise-modern-day-8274887>
- 16 <https://aidanmcquade.com/2016/03/18/not-peace-but-the-sword-remarks-to-the-global-sustainability-network-forum/>
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