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TRANSFORMING SUPPLY CHAIN
TRANSPARENCY IN PUBLIC PROCUREMENT:
LESSONS FROM SCANDINAVIA

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ACKNOWLEDGMENTS Thank you to the Winston Churchill Memorial Trust for funding the research and to its staff for their continued support.

Extended thanks to the *Let's Make It Work* advisory group and other organisations in the UK for sharing their contacts and networks in Scandinavia and to all those individuals interviewed in Denmark, Norway and Sweden.

Thank you to Sally Powell for her work on the design of the report.

Special thanks to Baroness Young of Hornsey and Luke O'Leary for their input during all phases of the Fellowship.

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GLOSSARY

BONDED LABOUR is a specific form of forced labour which occurs when a person is forced to work to pay off debt. It is also known as debt bondage.

ETHICAL CRITERIA are applied in public procurement tenders to set minimum working standards in the manufacturing of certain products where fundamental breaches of human rights and labour rights have been documented. They are also referred to as social criteria in this report.

FORCED LABOUR describes all work or service which people are forced to do against their will, under the threat of punishment.

HUMAN RIGHTS DUE DILIGENCE describes the actions taken by an organisation to both identify and act upon actual and potential human rights risks for workers in its operations and supply chains, and the services it uses.

HUMAN TRAFFICKING involves the recruitment, harbouring or transporting of people into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will.

LABOUR EXPLOITATION While there is no international legal definition of labour exploitation, the term refers to situations where people are coerced to work for little or no remuneration.

MODERN SLAVERY is an umbrella term used to describe various forms of serious human rights abuses including slavery, servitude, and forced, bonded or compulsory labour; and human trafficking.

PRIVATE MEMBER'S BILL is a public bill which is introduced by a member of parliament who is not a government minister. MPs or peers can introduce these legislative bills, though the process for doing so differs in both chambers.

PUBLIC PROCUREMENT is the term used to describe the purchasing of goods, services and works by local, regional and national public authorities.

SOCIALLY RESPONSIBLE PUBLIC PROCUREMENT is a process by which public sector entities take into account the impact of their procurements on society at large, at a local, national and global level.

SUPPLY CHAIN refers to the sequence of activities or actors required to produce goods or services and bring them to consumers through inputs and various phases of development, production and delivery.

SUSTAINABLE PUBLIC PROCUREMENT is a process by which public authorities seek to achieve the appropriate balance between the three pillars of sustainable development - economic, social and environmental - when procuring goods, services or works at all stages of the project.

TRANSPARENCY IN SUPPLY CHAINS describes the extent to which information about the companies, suppliers and sourcing locations is readily available to users and other companies in the supply chain. The idea is that an organisation should be accountable to groups such as employees whose lives are affected by its business activities.

ABBREVIATIONS

APPG	All-Party Parliamentary Group
DIFI	The Norwegian Agency for Public Management and eGovernment
EEA	European Economic Area
ETI	Ethical Trading Initiative
EU	European Union
GDP	Gross Domestic Product
ICT	Information and Communications Technology
ILO	International Labour Organisation
LMIW	Let's Make It Work initiative
MSA	Modern Slavery Act
NAP	National Action Plan
NHS	National Health Service
NGO	Non-governmental organisation
OECD	Organisation for Economic Co-operation and Development
OSCE	Organisation for Security and Co-operation in Europe
PP	Public procurement
SDGs	Sustainable Development Goals
SMEs	Small and medium-sized enterprises
SPP	Sustainable Public Procurement
SRPP	Socially Responsible Public Procurement
TISC	Transparency in Supply Chains
UNGPs	United Nations Guiding Principles on Business and Human Rights
UN	United Nations

EXECUTIVE SUMMARY

Every year, the UK Government spends billions of pounds on goods and services. The complex, dynamic and global nature of supply chains means that some of these goods and services are at risk of being produced in inhumane and exploitative conditions.

While large commercial organisations with a turnover exceeding £36 million are required to write a Transparency in Supply Chains (TISC) statement in accordance with the UK Modern Slavery Act 2015, public authorities and small and medium-sized businesses are not legally obliged to do so. In spite of being excluded from reporting obligations, there is growing interest from policy makers, politicians and public authorities in how public procurement can be used to tackle modern forms of slavery and labour exploitation.

Public authorities in Norway and Sweden are considered frontrunners in developing and implementing measures to prevent the worst forms of human rights and labour abuses in their global supply chains. This report investigates the work of public authorities and other relevant stakeholders in Denmark, Norway and Sweden and identifies lessons for actors in the UK.

Based on more than 30 interviews with government authorities, public officials and NGOs across three countries, the report asks: What is being done to strengthen transparency in global supply chains in Scandinavia? What are the benefits and challenges of the measures introduced? And what can be learnt from these experiences?

The report finds that a minority of public authorities in Norway and Sweden have developed effective measures and policies which can have an impact on workers in the supply chain. Done well, these measures can bring improvements for workers, and have political and economic benefits for public authorities.

However there are major challenges to ensuring that measures have the intended impact for both public authorities and workers in the supply chain. This report identifies five key challenges - collaboration, leverage, competencies, harmonisation of requirements and impact measurement - and in the cases where these exist, offers examples of best practice for overcoming these barriers.

Transparency in public sector supply chains is an area of policy still in its infancy. While important work is being done in this area in Norway and Sweden, more public authorities need to be designing and implementing measures to eradicate labour exploitation in their supply chains. Greater leadership, stronger legislation and more collaboration at a local and international level are essential to increase the leverage of the public sector on global supply chains.

The UK Government has declared that it will take steps to prevent and address modern slavery and human trafficking in public sector procurement practices. In doing so, it should reflect on the five challenges identified in this report and take into consideration the recommendations to ensure that relevant policies and tools are developed to enable stakeholders across the UK to work together to eradicate modern forms of slavery in public sector supply chains.

1 INTRODUCTION

Citizens are increasingly concerned about how their taxes are being spent and do not expect public funds to sponsor illegal activities. From the sale of weapons for foreign conflicts to supporting climate atrocities,¹ governments are being challenged on the ethics of these policies. Are states supporting the \$150 billion forced labour industry?² Whether directly or indirectly, the reality is that almost all governments across the world are implicated in abusive and exploitative labour practices in some way through their supply chains. The complex, dynamic and global nature of supply chains means that goods and services procured by public authorities are at risk of being produced in inhumane conditions. Most governments are simply not doing enough to avoid being complicit in these crimes.

With their huge spending power, public authorities are important businesses in our global economy. Every year, they buy billions of pounds worth of goods and services from the private sector. From small items such as office pens and uniforms to huge infrastructure projects like the construction of schools and roads and the provision of adult social care, the reach of their purchasing is substantial. The UK Government alone spent £284 billion on goods, services and works from external suppliers in 2017-2018.³

Situations of forced and exploitative labour have been documented in public sector supply chains in the production of surgical instrument workshops in Pakistan, the manufacturing of rubber gloves in Malaysia and the making of ICT equipment in China to name just a few examples.⁴ In the UK, there is a high-risk of modern slavery in key areas of public procurement, including the agricultural and construction industries.⁵

For decades, public procurement has been part of the problem by driving down the price of goods and services to an unsustainable level, but there is increasing recognition among politicians and policy makers that it can be part of the solution. With public purchasing accounting for an estimated 13.7% of the UK's GDP and an average of 13% in OECD countries,⁶ public sector organisations can use their leverage to influence fairer and more responsible purchasing practices.

States and businesses have a responsibility to promote and protect the human rights of workers as well as to provide remedy. International frameworks – including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Sustainable Development Goals (SDGs) – establish clear obligations for states and businesses to prevent, protect and remedy negative human rights impacts.

Several countries have enacted legislation on supply chain transparency or mandatory human rights due diligence. In 2015, the UK introduced the Modern Slavery Act (MSA) which includes a requirement, under Section 54, for large commercial organisations with a turnover exceeding £36 million to write a Transparency in Supply Chains (TISC) report. Most public authorities and small and medium-sized enterprises (SMEs) are not currently required to report although a number have chosen to do so voluntarily and have developed supply chain transparency initiatives. Former Prime Minister May announced in June 2019 the Government's intention to examine extending the scope of Section 54 to public sector buyers.⁷ In September 2019, the Government unveiled a series of new measures to tackle the issue of slavery in its supply chains.⁸ However, much remains to be done before the Government can ensure that its supply chains really are "slave free".

How are other countries addressing human rights and labour violations in public sector supply chains? A high degree of public scrutiny by NGOs and the media combined with leadership has led public authorities in several Scandinavian countries to act in this area. A grant by the Winston Churchill Memorial Trust allowed more research to be done on this work by European neighbours.

In Norway and Sweden, public authorities include ethical criteria in the tendering process for products where there is a high-risk of human rights abuses occurring, including textiles and electronics, and monitor the implementation of these clauses through meetings with suppliers, self-assessment questionnaires and occasional audits.

Although Norway and Sweden are considered frontrunners in addressing abuses in global supply chains, the scale and scope of activities varies considerably between public authorities. As the leaders in the field pointed out, there are still too few public authorities carrying out this work in a systematic way, making it very difficult to influence global purchasing practices.

Based on interviews with relevant stakeholders in Denmark, Norway and Sweden, this report asks: What is being done to strengthen transparency in global supply chains in Norway and Sweden? What are the benefits and challenges of the measures introduced? And what can be learnt from these experiences?

While there is a clear moral and political case - and some argue economic benefits to promoting human rights considerations in public sector supply chains - the research trip served to highlight significant barriers to this work. This report will explore five of these challenges in greater depth:

1. Collaboration;
2. Leverage;
3. Competencies;
4. Harmonisation of requirements;
5. Impact measurement.

This is a policy area still in its infancy. The UK Government has expressed its commitment to tackling human trafficking in public sector supply chains.⁹ As it considers doing so, now is a good time to reflect on what lessons can be learnt from abroad. While there are key differences, not least the size of the countries and economies in question, the experiences of public authorities in Norway and Sweden can help to inform work in this area in the UK. Supply chains are global and only through international dialogue and collaboration will public authorities around the world be able to influence human rights and labour conditions in their purchasing activities.

Part I analyses the context for this research including the issue of modern slavery in public procurement and the national and international legislation and frameworks which underpin this work. Part II considers the benefits and challenges for public authorities of implementing TISC initiatives and draws on examples from Norway and Sweden. In Part III, concluding remarks and recommendations are made for relevant actors in the UK.

2 METHODOLOGY

This report is the result of research carried out in Denmark, Norway and Sweden in April and May 2019 to investigate the implications of transparency in supply chain initiatives in public procurement. The report also builds on research carried out as part of the *Let's Make It Work* initiative in 2018-2019 and relevant literature and media articles.

Five cities were visited as part of the investigation: Copenhagen (Denmark), Bergen and Oslo (Norway) and Malmö and Stockholm (Sweden). 90% of the research was conducted in Norway and Sweden due to the two countries' greater focus on promoting human rights and labour rights in their global supply chains.

The principal method of research was qualitative interviews. Semi-structured interviews were carried out with relevant actors from over 30 organisations, including businesses, government agencies, public authorities, NGOs and trade unions. A number of experts in the UK also contributed to the project. The interview questions and organisations in Scandinavia which participated in the research are listed in Appendices 1 and 2.

3 AIMS

The aims of the Fellowship are:

1. to understand how relevant stakeholders in Denmark, Norway and Sweden are working to mitigate abusive and exploitative labour practices in public sector supply chains;
2. to investigate the benefits and challenges of initiatives in these countries and consider lessons for the UK;
3. to raise awareness among a wider audience about the potential of public procurement in combatting abusive and exploitative labour practices.

PART I. CONTEXT

4 MODERN SLAVERY AND PUBLIC PROCUREMENT

According to 2016 estimates by the ILO and the Walk Free Foundation, there are more than 40.3 million people in situations of modern-day slavery across the globe.¹⁰ Of these, 24.9 million are trapped in forced labour. In a world of globalisation and outsourcing of work to countries where the supply of labour is cheap and plentiful and the rule of law weak, it is very difficult to guarantee that the goods and services we use are not tainted by labour exploitation and modern slavery. However the problem is not just one which occurs beyond our borders; it is a domestic one too.

Modern slavery is an umbrella term used to describe various forms of serious human rights abuses including slavery, servitude and forced and bonded labour and compulsory labour; and human trafficking. It lies at one extreme of a continuum of labour exploitation and the line between labour exploitation and modern slavery is often difficult to determine. While the term is commonplace in the UK, its usage is more limited in other parts of the world, including in Scandinavian countries.¹¹

Situations of labour exploitation can occur across any supply chain, but are most prevalent where worker vulnerability is high, for example when a large part of the workforce is made up of migrant labourers. The likelihood of exploitation depends on a range of factors including the environmental, political and social conditions in which products are made and assembled, seasonal workforces and sector-specific pressures which drive down costs. Risks are present at different stages of the procurement, from the extraction of raw materials to manufacturing and even the distribution of the final product.

Governments and public authorities across the world purchase a huge volume of products and services from the private sector. Research has shown that governments have bought and consumed products made in conditions of exploitation, from surgical instruments to clothes and textiles.¹² A table of product groups where there is a high-risk of human rights abuses occurring is included in Appendix 3.

Estimates of the number of people in situations of modern-day slavery in the UK vary, but recent figures by the Global Slavery Index place the number at 136,000.¹³ Labour exploitation accounts for a large percentage of modern slavery cases with incidents reported in the agriculture, construction and hospitality sectors and at a recycling plant.¹⁴ Research has shown that there is a risk of modern slavery in the provision of adult social care and this could well be true of other services delivered by public authorities.¹⁵ Without adequate human rights due diligence in place, public procurement in the UK could fuel the domestic modern slavery industry.

5 PUBLIC SECTOR SUPPLY CHAIN TRANSPARENCY: LAWS AND GUIDELINES

How far have governments and public authorities around the globe come in tackling the issue of abusive and exploitative practices in public sector supply chains? Value for money is still the central consideration, but there is increasing interest in the role that public procurement can play in achieving secondary policy goals, including in combatting abusive and exploitative forms of labour.

Sustainable Public Procurement (SPP) recognises the strategic role of purchasing by public authorities. SPP is a process by which public authorities seek to achieve the appropriate balance between the three pillars of sustainable development - economic, social and environmental - when procuring goods, services or works at all stages of the project.¹⁶ Socially Responsible Public

Procurement (SRPP) is focused more narrowly on achieving human and labour rights. The term encapsulates a wide range of societal goals, including equal opportunity and decent work. Supply chain transparency is just one aspect of SRPP.

UN guidelines and EU procurement rules make clear that public procurement must respect fundamental human rights. In addition, there is increasing interest by national actors for legislation in this area. Several states have introduced TISC legislation or mandatory human rights due diligence, and/or guidelines and initiatives to promote greater supply chain transparency in public procurement.

5.1 INTERNATIONAL REGULATORY FRAMEWORKS

States have a duty to protect human rights under international guidelines. The United Nations Guiding Principles on Business and Human Rights, adopted by the UN Human Rights Council in 2011, established a set of rules for responsible business conduct and a framework for addressing negative human rights impacts.

The Principles introduced three basic pillars: protect, respect and access to remedy.¹⁷ The first pillar says that every state has a duty to protect human rights. Within this first pillar, Principle 6 is clear that “governments should promote respect for human rights by business enterprises with which they conduct commercial transactions”. The supporting commentary highlights that states have a unique opportunity to promote awareness of and respect for human rights through their commercial transactions with businesses, including through public procurement and terms of contracts.

The 2030 Agenda for Sustainable Development, adopted by world leaders at a 2015 UN summit, highlights the role that governments have to play in ensuring socially sustainable consumption.¹⁸ SDG 12.7 calls on all countries to promote and implement sustainable public procurement action plans, practices and policies for the benefit of society. SDG 8.7 specifically addresses the issue of forced labour, modern slavery and human trafficking, and aims to secure the prohibition and elimination of the worst forms of child labour by 2025.

At a European level, the 2014 EU Public Procurement Directives give greater focus to social and environmental concerns in the public procurement process than before.¹⁹ They confirm that public procurement may be used to achieve secondary policy goals, including innovation and environmental and social sustainability. Some of the provisions relating to social and environmental considerations in public procurement include:

- Member States must take appropriate measures to ensure that their economic operators act in compliance with applicable obligations in the field of environmental, social, and labour law including the ILO Core Conventions;
- Social aspects can be taken into account at every stage of the procurement process including in the selection and/or award criteria and contract performance clauses;
- Public authorities can require certification or other evidence of social/environmental aspects.

Transparency in public sector supply chains has garnered increased attention in the international arena over the past years. International organisations including the OECD, OSCE and EU are exploring how they may contribute to this agenda and increase collaboration between Member States. Declarations and statements since 2015 include:

G7 LEADERS' DECLARATION (JUNE 2015)

G7 leaders recognised the joint responsibility of governments and businesses for more transparency in supply chains and called for tools to support public procurers in meeting social and environmental commitments.²⁰

EU COUNCIL CONCLUSIONS ON BUSINESS AND HUMAN RIGHTS (JUNE 2016)

The Council encouraged EU institutions and Member States to address their responsibilities as commercial actors, including in public procurement, and when supporting or partnering with businesses. It called on the Commission to consider how public authorities could be supported in doing so through the development of tools and guidelines on the implementation of international obligations.²¹

PRINCIPLES TO GUIDE GOVERNMENT ACTION TO COMBAT HUMAN TRAFFICKING IN GLOBAL SUPPLY CHAINS (SEPTEMBER 2018)

At the 2018 UN General Assembly, five governments – those of Australia, Canada, New Zealand, United Kingdom and the United States - agreed to four Principles to improve public sector supply chain transparency. Principle 1 is a commitment for governments to take steps to prevent and address human trafficking in government procurement practices.²²

OSCE MODEL GUIDELINES (2018)

The Organisation for Security and Co-operation in Europe (OSCE) launched a programme focused on transparency in public sector supply chains and produced a set of Model Guidelines on Government Measures to Prevent Trafficking for Labour Exploitation in Supply Chains.²³

INTERNATIONAL CONFERENCE ON PUBLIC SECTOR SUPPLY CHAINS (MARCH 2019)

Public officials, parliamentarians, NGOs and other relevant actors gathered in London to discuss ways to tackle modern slavery, forced labour and human trafficking in public sector supply chains and to share expertise, knowledge and examples of best practice.²⁴

5.2 NATIONAL LEGISLATION AND GUIDELINES

There is significant momentum across OECD countries for legislation which regulates business behaviour with regard to human rights. Significant differences exist between jurisdictions and in the scope of the legislation. Several models have been adopted since 2010: modern slavery legislation with a supply chain reporting requirement (Australia and United Kingdom and the states of California and New South Wales) and mandatory human rights due diligence legislation (France and the Netherlands).

Modern slavery legislation requires organisations to report on their efforts (if any) to mitigate exploitation in their supply chains. While public entities are not included in the scope of the reporting in California and the United Kingdom, Australia has introduced an obligation for some public authorities to report.²⁵

In contrast, human rights due diligence laws require companies to show a duty of care in connection with their operations and investments. Under French law, companies are required to assess and prevent both human rights and environmental impacts.²⁶

Canada, Finland, Hong Kong, Norway and Switzerland are among those countries currently considering the introduction of modern slavery or mandatory human rights due diligence legislation. There is some concern that the proliferation of legislation in this area will create excess

regulatory burden on businesses and there are calls by both legislators and multinational corporations to avoid a multiplicity of different standards across jurisdictions, for example by creating European-wide regulation.²⁷

The United States introduced regulation to address the issue of human trafficking in public sector supply chains. The Federal Acquisition Regulation (FAR) includes the “Combating Trafficking in Persons” Clause which strengthens trafficking-related prohibitions for federal contractors, including a ban on the use of employee recruitment fees.²⁸ The absence of a definition for “employee recruitment fees” constituted an important stumbling block to the effectiveness of the Regulation, and it was amended in early 2019.

Governments have produced guidelines, policies and other initiatives to drive greater transparency in public sector supply chains. Procurement has been taken up widely by governments in their National Action Plans (NAPs) on Business and Human Rights and/or National Action Plans on Corporate Social Responsibility.²⁹ Some governments have produced practical guidance and toolkits for public authorities on supply chain transparency and a comprehensive list of these can be found in an OSCE compendium on the subject.³⁰

5.3 LEGISLATIVE DEVELOPMENTS AND INITIATIVES IN THE UK

The United Kingdom introduced the Modern Slavery Act in 2015 and in doing so, recognised that a tougher response to the crime was needed. The Act sets out a range of measures to combat modern slavery and human trafficking including the consolidation and clarification of previous offences relating to slavery and trafficking, the establishment of an independent Anti-Slavery Commissioner and measures to support and protect victims.³¹

Following the example of California’s supply chain legislation, the Act introduced a Transparency in Supply Chains requirement (Section 54). The provision requires any commercial organisation with a turnover of a prescribed amount, currently set at £36 million, to write a modern slavery statement, outlining the steps being taken by the organisation to prevent situations of forced and exploitative labour in its supply chains. A business can state that it has taken no such steps.

For basic compliance with Section 54, a modern slavery statement must be: (1) signed by a director, (2) approved by the board of directors (or equivalent) and (3) published on the organisation’s website and a link to the statement included on a prominent page of its homepage. Research has shown that a significant percentage of companies are failing to meet these basic requirements, let alone produce a quality statement.³² Two reports by Sancroft-Tussell have shown that this is true of companies in receipt of billions of pounds worth of public contracts.³³ Of the Government’s top 100 suppliers, 29% are non-compliant, with three in-scope companies failing to produce a statement at all.

While most public authorities are not currently required to write a TISC report under the MSA,³⁴ some local authorities, NHS trusts and police forces have voluntarily published a statement. 43 of England’s 418 local authorities have written statements. An analysis of these statements concludes that while councils have shown leadership by reporting, an improvement is needed in the quality of the statements.³⁵ This could, in part, be due to the current legislation not being suited to public bodies.

Besides the failure to extend the scope of the legislation to public authorities, Section 54 has other shortcomings in both its design and implementation. Several key elements necessary for the law’s monitoring and enforcement are absent: there is no central repository of reports or a list of companies required to comply with the legislation. The absence of these two instruments is a

significant impediment for monitoring compliance with the Act, particularly as the responsibility for doing so has thus far fallen on the shoulders of civil society actors.

The Government has failed to adequately monitor and enforce Section 54. While there are no financial penalties for non-compliance with Section 54, the Secretary of State can initiate civil proceedings for an injunction. No such steps have been taken to date. In the absence of government enforcement, businesses are questioning whether the original purpose of the transparency requirement – that of “leveling the playing field” – is really being achieved.

Since the introduction of the MSA, there have been numerous calls to strengthen Section 54 both from within and outside the UK Parliament. In 2016, Baroness Young of Hornsey introduced a Private Member’s Bill (PMB)³⁶ – the Modern Slavery (Transparency in Supply Chains) Bill (2016-2017)³⁷ – to extend the reach of TISC reporting to public authorities and to introduce a list of companies required to report. The Bill was passed in the House of Lords, but did not progress to a second reading in the House of Commons.

At the start of the 2017-2019 parliamentary session, Baroness Young presented an amended Modern Slavery (Transparency in Supply Chains) Bill.³⁸ The Bill addressed the shortcomings of the current TISC legislation and proposes the inclusion of public authorities in the scope of Section 54. A summary of Section 54 and the proposed amendments can be found in Appendix 4. Due to a ballot process, the Bill never received a second reading in the House of Lords during the 2017-2019 parliamentary session,³⁹ but it nevertheless helped to create awareness of the weaknesses of Section 54. To support the Bill and improve compliance with Section 54, Baroness Young devised the *Let’s Make It Work* initiative in autumn 2017, described in more detail in Appendix 5.

In 2018, the Government commissioned an Independent Review of the Modern Slavery Act, led by Frank Field MP, Maria Miller MP and Baroness Butler-Sloss to assess the state of the legislation. The Review issued a number of recommendations on Section 54 including: extending requirements to the public sector, the creation of a repository and making mandatory the six areas of “recommended” reporting.⁴⁰

In late 2018, the UK Government stated it would publish a modern slavery statement though it has not been produced to date.⁴¹ In June 2019, Prime Minister Theresa May announced the Government’s intention to address several of the weaknesses of Section 54 including the failure to cover the public sector and “its vast purchasing power” in the scope of the Act and the absence of a registry.⁴² Following this announcement, an open consultation on Transparency in Supply Chains, including on potential measures to be taken in the public sector, was launched in July 2019.⁴³

In other developments, the Cabinet Office launched a consultation on social value in the award of central government contracts in spring 2019.⁴⁴ The consultation builds on the Public Services (Social Value) Act 2012 which places a requirement on relevant public authorities to consider economic, environmental and social well being when procuring services. The consultation examined how social impact may be strengthened through award criteria in key policy areas, including safe supply chains.

Besides legislation, there have been a number of positive initiatives to strengthen public sector supply chains. In September 2019, the Government unveiled a series of new measures including new guidance, a digital tool and a training package to tackle modern slavery.⁴⁵ Individual public authorities have been active in developing initiatives and a number meet on a regular basis as part of the ETI Working Group on Public Procurement.⁴⁶

The devolved administrations have in particular shown leadership in this area. The Welsh Government published a Code of Practice on Ethical Employment in Supply Chains in 2017 to

ensure fair labour practices in public procurement.⁴⁷ The Code includes 12 commitments for organisations to fight against modern slavery, including written policies on ethical employment, evaluation of high-risk areas and training for all relevant staff. All Welsh public bodies, and businesses and organisations receiving Welsh public funds are expected to sign up to the Code. The Scottish Government has revised its national sustainable procurement tools and has designed Sustainable Procurement Guidance which includes advice for public authorities on conflict minerals and worker conditions.⁴⁸

6 WHY SCANDINAVIA?

Individual public authorities in Norway and Sweden have led the way on addressing human rights abuses in public sector supply chains. In both countries, there has been interest in the use of environmental criteria in public procurement since the 1990s and a natural extension of this work has been to consider social responsibility in procurement processes. Scandals have also had their part to play. A series of reports in 2007 and 2008 by NGOs and the media linking public procurement to human rights abuses galvanised officials to develop processes and procedures to address human rights violations in their global supply chains.⁴⁹

Public authorities (or indeed businesses) in Norway and Sweden do not report on modern slavery and supply chain transparency. Instead public authorities promote decent working conditions in global supply chains at different stages of the procurement process through the setting and implementation of ethical criteria. Public authorities apply ethical contract performance conditions and to a lesser extent, qualification criteria to require that suppliers' activities are compatible with international human rights and labour rights frameworks.⁵⁰ A few public authorities have piloted the use of award criteria.

Social contract performance conditions are mostly introduced for high-risk products where adverse human rights impacts have been documented, including textiles, medical instruments and ICT equipment. Suppliers must agree to comply with some or all of the following regulatory frameworks during the lifecycle of their contracts⁵¹: the UN Declaration on Human Rights, the ILO eight core Conventions (No. 29, 87, 98, 100, 105, 111, 138 and 182),⁵² the UN Convention on the Rights of the Child,⁵³ existing legislation in the country of production concerning health and safety, labour rights and the environment and the UN Convention against Corruption.⁵⁴ Under the terms of the contracts, suppliers are required to undertake human rights due diligence to verify that goods are compliant with the required social standards.

Contracting authorities can verify and enforce the ethical conditions and terminate the contract if any violations are found. Approaches to monitoring differ greatly. Steps to verification may include face-to-face meetings with suppliers, self-assessment questionnaires, office audits and factory audits. When instances of non-compliance are found, suppliers are asked to develop a corrective action plan and if unsatisfactory or no action is taken by the supplier, public authorities may exercise contractual remedies, for example termination, though this remains very rare.

Individual public authorities can choose the focus and extent of integration of ethical contract conditions and/or qualification criteria. Central government agencies provide guidance, sample contract clauses and training to assist public authorities with their work. The use and effectiveness of the implementation of ethical criteria in public sector contracts varies widely across both Norway and Sweden and, as will be discussed in a later stage, accurate figures of the number of public authorities which implement ethical criteria are hard to come by.⁵⁵

NGOs and the media have made important contributions to this agenda. They have raised awareness of the potential human rights violations in public sector supply chains and some NGOs have worked closely with public authorities to develop strategies and policies to tackle these abuses. Some of their contributions will be explored in Part II.

There is a clear distinction in the policies and processes used by government and public authorities in Denmark, Norway and Sweden to address human rights violations in supply chains at a domestic level and internationally. Regulations and national strategies have been developed to address work-related crimes and particularly to combat “social dumping” – a term to describe situations where foreign workers are offered lower standards of pay, health and safety compared to their national counterparts – which occurs in industries where the workforce is low-skilled or semi-skilled, such as construction. In Norway, a limit on the number of layers of subcontracting has been introduced to combat domestic labour abuses in “high-risk” industries.

There is no minimum wage in any of the countries visited and most contract performance clauses do not consider collective agreements in the Nordic labour markets.⁵⁶ While important initiatives have been introduced to fight social dumping, the focus of this report will be on the processes developed to address labour conditions in global supply chains, rather than at a domestic level.

The Fellowship included a brief visit to Denmark. Danish public authorities have a number of strategies in place to combat domestic work-related crimes, for example the Municipality of Copenhagen monitors and enforces minimum working conditions on the city’s construction sites very closely. Less work has been done on monitoring ethical contract clauses in global supply chains. The main purpose of visiting Copenhagen was to meet individuals from the Danish Institute for Human Rights and the procurement arm of the United Nations, UNOPs. Context and examples from Denmark will therefore be more limited.

PUBLIC PROCUREMENT IN NORWAY

As a member of the EEA, Norway follows European rules on public procurement. Norway implemented the 2014 EU Public Procurement Directives into legislation in 2016 and as part its revised 2017 Public Procurement Act, Paragraph 5 introduced an obligation for public authorities to “have adequate procedures in place to promote respect for fundamental human rights in procurements where there is a risk of breach of such rights”.⁵⁷ The wording of the clause is vague, and does not define either “procedures or risks” and as such, stakeholders argue about the impact of this new requirement.

In Norway, public authorities include ethical contract performance conditions or qualification criteria in contracts for products where there is a high-risk of fundamental breach of human rights.

Procurement in Norway is largely decentralised and there is an absence of common processes and procedures with individual authorities deciding on what actions to take with regard to socially responsible public procurement. Some authorities such as the Municipality of Oslo have been very active in implementing procedures,⁵⁸ while others due to size or availability of resources, have done much less.

There are limitations of any direct comparison with Scandinavian countries. As mentioned above, there is no requirement for public authorities to report on modern slavery risks and the focus in Norway and Sweden is more broadly on fundamental human rights and labour rights rather than on modern slavery. In addition, Nordic countries have smaller economies and the world's largest public sectors in terms of employment.⁵⁹ Nevertheless, public authorities in Norway and Sweden have been working to mitigate negative impacts in their global supply chains for longer than most and important lessons have been learnt in doing so.

PUBLIC PROCUREMENT IN SWEDEN

Sweden follows EU rules on public procurement. Sweden's National Strategy on Public Procurement, published in 2017, sets out the expectations for public buyers and its policy objectives, including that public procurement should contribute to a socially sustainable society.⁶⁰ The Strategy highlights the ways in which public procurement can be used to achieve societal goals, including through the use of social criteria in public contracts to promote fair trade and the use of apprentices.

In Sweden, three types of public authorities exist – Municipalities, Swedish County Councils and Regions, and Government Agencies – and engagement with supply chain transparency varies at each level.

The Swedish County Councils and Regions – responsible for health care, dental care and public transportation – have led the way on this agenda and have a formalised structure and procedures for dealing with high-risk procurement areas. Since 2010, 21 County Councils have used a common Code of Conduct and ethical contract performance conditions for the purchase of high-risk products. They are active in monitoring and following up on supplier obligations. The implementation of ethical criteria is less widespread at a local and governmental level, though some good practice exists, for example with the sharing of audits at the municipal level.

WHAT IS BEING DONE IN NORWAY AND SWEDEN TO TACKLE HUMAN RIGHTS ABUSES IN GLOBAL SUPPLY CHAINS?

PUBLIC AUTHORITIES: DESCRIPTION OF ACTIONS

1 Risk assessment and human rights due diligence: Public authorities carry out a risk assessment to determine where fundamental breaches of human rights may occur in their supply chain. Some authorities develop an action plan.

2 Formulating ethical criteria: If public authorities decide there is a risk, ethical criteria may be introduced in the tendering process. These can be contract performance clauses, qualification or award criteria. Ethical criteria may be specified in a Code of Conduct.

3 Monitoring: Verification includes some or all of the following steps: meetings with suppliers to discuss requirements, self-assessment questionnaires, office audits or factory audits. The level of engagement will depend on the information provided by suppliers, level of risk and the volume of contract.

4 Corrective action plan: If a breach of contract is found, the supplier will develop a corrective action plan and a timeframe for action.

5 Sanctions: As a last resort, a contracting authority may choose to freeze the contract, impose fines or terminate the contract. These measures will have been specified in the terms of the contract.

CENTRAL GOVERNMENT AGENCIES: DESCRIPTION OF ACTIONS

- Produce template social and environmental performance contract clauses;
- Provide training for public authorities;
- Produce guidance on high-risks categories;
- Develop tools and initiatives to support socially sustainable public procurement.

NGOs: DESCRIPTION OF ACTIONS

- Provide support and advice to public authorities and supplier market;
- Convene working groups and create networks to discuss social sustainability in public procurement;
- Conduct investigations on fundamental human rights breaches in public procurement;
- Carry out risk assessments on behalf of public authorities and develop policies and procedures for socially sustainable public procurement;
- Develop pilot projects in collaboration with public authorities to test new ideas and implementation of criteria.

PART II BENEFITS AND CHALLENGES FOR PUBLIC AUTHORITIES

7 BENEFITS

Experts across Denmark, Norway and Sweden highlighted the moral, reputational and potential economic benefits of introducing supply chain transparency initiatives. Five of these are highlighted in the next section.

7.1 REDUCING WORKER VULNERABILITY

Improvements in conditions for workers should be the ultimate goal of greater supply chain transparency. Is there any evidence from Norway and Sweden that measures have led to such improvements? Examples are limited but several cases demonstrate that when monitoring occurs and corrective action plans are drawn up, public authorities can have a positive impact on workers several tiers down their supply chain.

ADDRESSING VIOLATIONS IN THE PRODUCTION OF RUBBER GLOVES IN MALAYSIA

The Swedish County Councils and Regions

In 2015, human rights and labour violations were detected in the production of rubber gloves in Malaysia. At the time, the Swedish County Councils and Regions had a contract with a Swedish wholesaler for gloves made in a Malaysian factory where breaches had been documented. On discovering the abuses, public officials initiated a three-step follow-up process and decided to carry out a factory audit in Malaysia. The audit found 24 violations of human rights and labour rights, 10 of which were major. These included the retention of passports for migrant workers, the use of recruitment fees and contracts which workers could not legally terminate. A corrective action plan was made and discussed with the factory management who announced it would assume responsibility for all recruitment fees going forward.

Although factory audits have their limitations as will be discussed in the next section, public authorities that have carried out inspections at factory sites and worked to remedy the situation with suppliers have had tangible successes in improving and remedying certain labour abuses, in particular the use of recruitment fees. The Stockholm-based NGO Swedwatch has documented improvements in conditions for workers where there has been public sector involvement.⁶¹

IMPROVING CONDITIONS FOR VIETNAMESE WORKERS IN MALAYSIA

The South-Eastern Norway Regional Health Authority⁶²

The South-Eastern Norway Regional Health Authority awarded a contract for surgical instruments to a wholesaler sourcing from factories in Malaysia. The results of a third-party audit found that serious mistreatment of migrant workers from Vietnam was occurring. Violations included the confiscation of passports, the payment of recruitment fees, excessive

overtime and the issuing of contracts in English only. The auditor and public authority representatives met with the contractor and agreed on a number of corrective actions: the return of passports to workers, the reimbursement of agency fees, the translation of contracts into Vietnamese and the development of a better system for monitoring working conditions. The audit contributed to better living and working conditions for more than 600 Vietnamese workers and helped to raise awareness of the problem. This also led to the introduction of structural changes to ensure that similar abuses were not found in the future.

Despite the positive outcome of these cases, such examples are still too limited. Most public authorities struggle to verify the performance of suppliers in relation to human rights. With no monitoring, introducing ethical criteria can only have limited impact, if any at all. Change will only be the result of sustained monitoring on the part of public authorities and this requires adequate resources and competencies, challenges which will be discussed in the next section.

7.2 CREATING AWARENESS AMONG BUSINESSES

Public authorities can create greater awareness among suppliers of potential human rights issues in the supply chain and contribute to the adoption of more sustainable business practices.

“What we do see is that when the public sector gets involved, for example in the rubber gloves scandal, companies are really starting to listen. Based on our experience, there is an argument that companies are responding well to public sector requirements, there does not even have to be a legal implication. The threat of not getting the contract next time is enough”.

Ethical trade advisor, Norway

By including social sustainability on the agenda, suppliers are beginning to consider risks in their supply chains and to introduce measures to mitigate these. Public officials have observed changes among companies including the employment of sustainability officers, engagement by senior-level management and the adoption of more robust risk analyses. There have been improvements in the quality of self-assessment questionnaires and other documents provided by suppliers over the past few years, although there is still a long way to go.

ENGAGEMENT BETWEEN THE SWEDISH COUNTY COUNCILS AND DELL COMPUTER CORPORATION

The Swedish County Councils and Regions

In November 2013, a report was released documenting labour rights and safety violations in four factories in China supplying goods to major electronics brands. Alarmed by the report, the Swedish County Councils and Regions network contacted Dell, one of its computer suppliers. Facilitated by Electronics Watch, the network began a long-term engagement process to ensure that Dell used its full leverage and capacity to remedy violations. This resulted in Dell's disclosure of audit results and corrective action plans and the development by public authorities of new selection criteria and contract conditions for electronic goods.⁶³

To improve supplier awareness and promote responsible business conduct, public authorities must work collaboratively with suppliers. As one public official pointed out, “Our main objective is to work together to see improvement”. Few public authorities wish to terminate contracts given the cost implications in doing so and therefore supplier engagement is key to driving change.

7.3 LEADING BY EXAMPLE

The introduction of supply chain transparency initiatives is an opportunity for governments and public authorities to show political and moral leadership on social and environmental questions and to create a values-led organisation.

Several cities in Norway and Sweden have introduced procurement strategies and action plans which place social and environmental sustainability at the heart of what they do. The Municipality of Oslo's Procurement Strategy includes a sub-objective "to make Oslo a warmer city that accommodates everyone" and states that the Municipality must work actively to ensure that its global supply chains safeguard fundamental rights.⁶⁴ This strategy is actively implemented across the city.

As an UN official pointed out, there is huge potential for local government to drive this agenda: "Public procurement has so much influence, but not always at the state level. Municipalities have a huge amount of power and can contribute greatly to sustainability". Cities and local government can have an impact on national and global sustainability goals, including the SDGs.

Håkon Pettersen, Bergen's Commissioner of Finance, Innovation and Property, explained that when cities lead by example, business follow and are keen to contribute to the SDGs. "You need to establish a clear political message: We use the power of procurement, but we will work together with the private sector".

From an organisational point of view, several individuals pointed out that a focus on environmental and social goals can contribute to employee satisfaction and give staff a greater sense of purpose in the work they do.

7.4 MANAGING REPUTATIONAL RISKS

Driving socially responsible solutions in public procurement can prepare public authorities to respond to citizens' concerns. Awareness of human rights abuses and modern slavery has increased significantly in recent years thanks to media focus on the issue. Stories linking public authorities to the worst forms of human rights abuses are not uncommon and by having human rights due diligence in place, public authorities can show that they are acting to mitigate these risks.

Poor publicity on supply chain issues has been a key driver for public authorities in Norway and Sweden. NGOs and the media have kept the issue in the public eye and provided wake-up calls for complacent public authorities. In 2006, the city of Gothenburg experienced a major scandal when a radio documentary alleged that its paving stones were produced by child labour. Several other scandals ensued and public authorities are keenly aware of the reputational damage done by these media stories.

7.5 IMPROVING RESILIENCE OF SUPPLIES

Reputational damage can have a financial risk. If public authorities are forced to switch suppliers, launching a new bid can be very time-consuming and costly. Carrying out human rights due diligence can help to build more robust and resilient supplies.

While several public authorities mentioned the financial implications of terminating a contract, no one was able to put a direct cost implication of the termination of the work. There may be an economic case for greater supply chain transparency for public authorities but more research needs to be carried out on the cost benefits of this work.

8 CHALLENGES

Eliminating human rights abuses from public sector supply chains will take years, if not decades. As it became clear while interviewing organisations across Scandinavia, public authorities in Norway and Sweden are faced with numerous challenges in implementing and monitoring supply chain transparency measures. Five challenges are identified in the next section. Alongside these barriers, lessons are provided for stakeholders in the UK.

8.1 COLLABORATION

The biggest challenge of implementing ethical criteria is how to monitor and enforce compliance during the contract period. No public authority has the resources to follow up on every contract. Many public authorities use the same supplier base and therefore sharing the results of audits and developing common procedures is hugely beneficial to improving efficiency and reducing costs. Despite evidence of these benefits, there are still too few public authorities coordinating their activities.

Public authorities in Norway and Sweden monitor ethical criteria in the following ways: face-to-face meetings with suppliers, self-assessment questionnaires, desk and/or factory audits. Some public authorities work through all these steps while others do no follow-up whatsoever. Factory audits in the countries where goods are manufactured continue to be very limited.

Monitoring compliance is time-consuming and resource intensive. From the mapping of human rights risks to identifying specific problems which warrant further investigation, this work requires capacity at an internal level, and can have external costs, with the hiring of third-party auditors, consultants or trips by officials to manufacturing sites. Sharing this work makes good sense.

“The difference between the private and public sector is that we are not in competition. We can easily share all the results, processes and routines, risk analyses and follow-up results. Maybe this could even happen at an EU-level. A platform for sharing the results would be very beneficial”.

Official from the Swedish County Councils and Regions network

LESSON 1. CENTRALISED MONITORING

Public authorities in Norway and Sweden which are best able to follow up on contract clauses are those which have developed processes for sharing the workload.

DIVIDING RESPONSIBILITY FOR HUMAN RIGHTS

The Swedish County Councils and Regions

The 21 Swedish County Councils and Regions - responsible for health care and transportation at a regional level - have a formalised structure with a steering committee and a National Secretariat to facilitate work on social and environmental sustainability. The councils and regions share a Code of Conduct, contract performance clauses, processes and audit results. Since 2016, the county councils have divided responsibility for different high-risk product categories. Each council has been split into one of eight groups and given responsibility for one of the following areas of procurement: medical instruments, food and related services, ICT, gloves and disposables, medical devices, textiles, pharmaceuticals, dressings and surgical instruments. Each group is responsible for carrying out a risk analysis, designing an action plan, audits, industry dialogue and developing new methods to address specific risks. This

approach avoids the duplication of work and contributes to more systematic monitoring. As the network's coordinator highlighted: "We should not reinvent the wheel 21 times when county councils share the same supplier base".⁶⁵

Collaboration at a local level in Sweden is not as systematic. Centralised audits do occur thanks to the work of SKL Kommentus, a central purchasing body that provides framework agreements to Swedish municipalities and other clients. It carries out monitoring and follows up on behalf of all its members (mostly municipalities) and shares the results of its audits on a central platform with its members. It also collaborates with the Swedish County Council and Regions network to share information.

There is scope for cooperation over audits and information at an international level. A formal agreement has been set up for the sharing of audits and monitoring in the health care sector between the South-Eastern Norway Regional Health Authority, SKL Kommentus and the Swedish County Councils and Regions. These organisations have also worked with the UK's National Health Service.

As a general rule, there is still too little collaboration in the sharing of information and audit results. Public authorities in the UK should consider how they may collaborate in assessing and managing modern slavery risks. Some local councils in England have made a good start by writing joint modern slavery statements and public authorities can go further by exploring the potential for joint action plans.⁶⁶

Digital tools can help to improve collaboration and the efficiency of monitoring work. Public authorities would like to see more information-sharing platforms – both at a national or EU-level – to deal with constraints on time and resources.

LESSON 2. NETWORKS AND DIALOGUE BETWEEN PUBLIC AUTHORITIES

How can public authorities with greater knowledge of sustainability issues support those with less experience in this area? There are positive examples of officials collaborating across public authorities to share knowledge and improve efficiency.

Some public authorities have chosen to set up informal networks with neighbouring public authorities. For example, the Municipality of Malmö has created a discussion group on sustainability for neighbouring cities in Sweden's southern county of Skåne. The Municipality of Oslo is examining the possibility of providing assistance to other agencies and municipalities by sharing information including model-contract clauses on its intranet. It is also looking into how it may offer packages with guidance and training to other municipalities.

Membership of relevant networks offers an opportunity to share problems and solutions. Some public officials mentioned the merits of membership of the European network on sustainability Procura+⁶⁷ and ETI's Working Group on Public Procurement. The Municipality of Oslo has also joined the UN Global Compact Network.

Several limitations of networks were mentioned. One public official warned that reporting for networks was very time-consuming and detracted from other aspects of her work on supply chain transparency. Another concern expressed was that networks and training sessions are too capital-centric.

8.2 LEVERAGE

The potential of public procurement to influence global supply chains is limited when only a minority of public authorities are driving TISC initiatives. Public officials in Norway and Sweden highlighted the difficulties of shifting business behaviour when other colleagues had not come on board.

“It’s definitely possible to create change but you need to do this work on a much larger scale. The key issue is that there aren’t that many public authorities doing this work and those that are, aren’t doing it sufficiently, with some exceptions”.

Linda Scott Jakobsson, Swedwatch

Most organisations interviewed believed that legislation would be beneficial to increase pressure on suppliers. Legislation would help to create a level-playing field and to ensure that all businesses adhere to a minimum baseline. It would also contribute to making sustainability a more mainstreamed part of the public procurement process.

“We need legislation, we need good legislation. Soft regulation will not change anything, companies aren’t going to do this out of the goodness of their heart”.

Official from the Swedish County Councils and Regions network

While a majority expressed the view that legislation would be beneficial, several disagreed, arguing that Scandinavian businesses have a long tradition of self-regulation and do not need legislation to ensure their operations are conducted in a sustainable way.

However, legislation alone will not be sufficient in creating the desired leverage. It needs to be given teeth by introducing appropriate sanctions and penalties. Since 2017, Norwegian public authorities are required by law to introduce procedures for products where there is a high-risk of fundamental human rights breaches. The wording of the legislation is vague and stakeholders interviewed disagreed about its impact. One organisation pointed out that companies have stopped prioritising action in this area after realising that the legislation would not be enforced.

Besides legislation, leverage can be achieved through sectoral initiatives and monitoring groups such as Worker Rights Consortium⁶⁸ and Electronics Watch. The latter has brought together more than 300 public authorities from across Europe to improve conditions in public sector electronics supply chain.

CREATING LEVERAGE IN THE ELECTRONICS INDUSTRY

Electronics Watch

The mission of Electronics Watch is to help public sector organisations work together and collaborate with civil society monitors in countries of production to protect the rights of workers in the electronics supply chains. It works with civil society groups which serve as the eyes and ears of affiliates on the ground in more than ten countries. Thanks to this system, public buyers can detect problems which may not otherwise be raised by social auditors. Electronics Watch finds solutions by engaging in dialogue with companies, local partners and employers on behalf of public authorities.

A key question is where can individual local authorities and governments have greatest leverage? The Municipality of Bergen has decided to focus its supply chain work transparency on one area where Norway is the world's largest customer: electric cars.⁶⁹ Over the next few years, it will lead a project on mapping the electric car supply chain to gain a better understanding of the potential human rights risks involved, though with roughly 60,000 different components to a single car, this will be no easy task.

LESSON 3. EXPLORING THE POTENTIAL OF LEGISLATION

Legislation could encourage more public authorities to carry out supply chain transparency work and improve engagement by businesses. The UK Government has an important opportunity to do so by extending TISC reporting requirements of the Modern Slavery Act to the public sector. It should also engage with governments which have adopted TISC provisions for public entities to share best practice and guidance.

LESSON 4. DEVELOPING SECTORAL INITIATIVES

Sectoral initiatives like Electronics Watch or the Worker Rights Consortium can help public authorities increase leverage in the supply chain and find common responses to the challenges of monitoring. There are still too few sector initiatives like Electronics Watch. How could this model be replicated in other sectors where the public sector has a large spend?

8.3 COMPETENCIES

An absence of basic knowledge about human rights was described as an issue among public procurers in the countries visited, particularly in remote parts of Norway and Sweden where there may only be one individual in charge of all public procurements. Officials are faced with a number of competing demands in the procurement process including price, quality, anti-corruption, innovation, SMEs and environmental and social sustainability. Human rights are likely to be only a negligible part of their work and therefore a basic understanding of terms and procedures may be lacking.

Training is needed to ensure that officials understand key concepts and international frameworks and have the expertise to carry out risk analyses, to assess the quality of the information provided by suppliers and to make a good value judgment, particularly at the start. As one official pointed out when talking about self-assessment questionnaires, "I can imagine that for officials in smaller municipalities it is very difficult to judge what is a good or bad answer".

Suppliers, particularly SMEs, may also struggle to understand the demands made by the public sector. "Some suppliers just don't know what we are talking about," explained a Norwegian public official. A common source of confusion is the use of environmental labels as evidence of social sustainability.

The requirements made by public authorities with regards to sustainability should be communicated clearly to suppliers. To do this, public officials need to understand what they are asking. Public authorities should work with suppliers to grow competencies and knowledge.

Without sufficient training, public officials will struggle to navigate the burgeoning consulting industry of modern slavery and supply chain transparency in public procurement, according to one Swedish expert. The number of consultancies and NGOs working on the issue has grown substantially in recent years and while some are doing extremely valuable work, there is a huge range in the quality of consultants. Public officials need to be able to assess the market and make informed choices.

Knowledge of human rights and supply chain transparency frameworks may well be an issue for public officials in the UK. Research has shown that there is confusion among consumers over the term “modern slavery”.⁷⁰ How can public sector officials be given the tools to carry out this work effectively?

LESSON 5. CLEAR GUIDELINES FOR PUBLIC AUTHORITIES

Central government agencies have an important role in assisting public authorities by creating guidelines, sample ethical criteria and by providing training. The Norwegian Agency for Public Management and eGovernment (Difi) has produced a High-Risk List to highlight product groups where fundamental breaches of human rights have been documented (see explanation), a template for performance clauses and organises breakfast seminars and trainings to educate public officials on certain product group. In Sweden, the National Agency for Public Procurement manages a sustainability criteria library where public authorities can find template social clauses for certain product areas. The Danish Institute for Human Rights, a Copenhagen-based national human rights institution, is currently working on providing practical guidance on public procurement for policy makers and practitioners. The UK Government has made a start by producing new guidance on tackling modern slavery in supply chains for commercial staff in the public sector and should consider how this can be enhanced.

LESSON 6. STRENGTHENING INTERNAL CAPACITY

Public authorities should build the competencies of their staff. This could include training on human rights due diligence, international frameworks such as the UNGPs and the SDGs and on how to carry out basic risk assessments. For example, the Swedish County Councils and Regions network increased the capacity of five members in 2015 and trained them to become experts in risk assessment and the implementation of the UNGPs. Members were then better equipped to carry out their own risk assessments for different areas of procurement.

HIGH-RISK LIST

The Norwegian Agency for Public Management and eGovernment (Difi)

The 2017 Norwegian Public Procurement Act requires public authorities to implement appropriate measures to promote respect for human rights in public procurement where there is a risk of violation of such rights. To help public sector entities determine what constitutes “high-risk”, Difi worked with the NGO Swedwatch to create a list of ten product groups where systematic breaches of human rights have been well-documented. The list provides details about the types of risks, information about sector initiatives and guidance on how to write contract performance clauses and follow-up on the clauses for each product group. The high risk is available to consult in English on Difi’s website⁷¹ and a summary is provided in Appendix 3.

8.4. HARMONISATION OF REQUIREMENTS

Greater consolidation of requirements and processes at a national and international level is vital to increase the influence of public authorities on global supply chains. Procedures differ quite significantly across Norway and Sweden, with public authorities setting different levels of demands on suppliers.

The absence of common frameworks and differing language between public authorities can create confusion among suppliers. Public authorities should use common language to make clear the requirements for businesses.

“There’s a willingness for transparency among companies but then every authority sets its own rules and guidelines. Some help in making decisions but others are counterproductive and create more work which is not very meaningful”.

Chiara Selvetti, Atea

In Sweden, the best example of standardised processes is at the regional level where all 21 county councils use a common Code of Conduct referring to the same regulatory frameworks, contract clauses and monitoring processes (see case study). The creation of a formalised structure with a steering committee, National Secretariat and regional coordinators is crucial to achieving this level of harmonisation. This does not occur in Norway where the National Agency for Public Management and eGovernment makes recommendations but each municipality and contracting authority is free to set its own requirements.

Stakeholders in Norway and Sweden expressed their desire to see greater international collaboration on these matters. Some welcomed the International Conference on Tackling Modern Slavery, Forced Labour and Human Trafficking in Public Sector Supply Chains in March 2019 as a good forum for discussion between policy makers and politicians and were positive about the interest shown in this policy area by the EU, ILO, and OECD. Several public entities pointed out that consolidation at the European level would make most sense given that procurement rules are governed by EU Directives.

LESSON 7. BUILDING COMMON REQUIREMENTS

How can frameworks and procedures be harmonised in the UK? Central government should work with relevant stakeholders in England, Northern Ireland, Scotland and Wales to produce common requirements. An example of good practice is the aforementioned establishment of a national authority responsible for coordination, like the Swedish National Secretariat for County Councils and Regions, which can lead to an increased level of harmonisation, more efficient processes and a reduction of costs. While this network only operates at a regional level, a central authority that develops common requirements and practices would be very beneficial in the UK.

LESSON 8. GREATER INTERNATIONAL DIALOGUE AND EXCHANGE

Dialogue is needed at an international level to increase leverage on global supply chains. Many public authorities whether in Sweden or the UK share suppliers and therefore could work together to address these issues. Sectoral initiatives such as Electronics Watch offer opportunities to develop common approaches. Political decision makers should support these and look at how they can work together to harmonise measures and processes to achieve leverage in certain product groups.

The UK Government should engage with foreign governments and multilateral organisations on this issue and consider the creation of practical tools for the exchange of information and best practices. It could show leadership by convening an international conference with business, civil society, governments, NGOs and policy makers to work out a schedule for developing international standards for supply chain reporting in the public sector.

8.5. IMPACT MEASUREMENT

During the course of the Fellowship, it became clear that public authorities in Norway and Sweden struggle to measure the impact of their work on supply chain transparency. The difficulties of documenting concrete results, whether on suppliers or on working conditions, was a common frustration.

Public authorities highlighted three fundamental challenges: the current model of social auditing, access to remedy and the inability to influence the local political and legislative contexts in which their suppliers are operating.

Public authorities expressed concern that the current model of factory audits is ineffective. Problems with this model include the difficulties of inspectors turning up unannounced, corruption, superficial audits and the existence of model factories.⁷² Social audits do not guarantee that workers' voices are heard or any improvement in conditions. There is increasing interest among public authorities in alternative methods of monitoring where there is engagement with workers outside the factory. One public authority is currently working with an ethical trade consultancy firm to pilot an alternative method of auditing in Malaysia.

There are few examples of public authorities successfully securing appropriate remedy for workers and bar the two examples provided earlier, no more details were given. What remedy should public authorities require? What role can they play in securing remedy? Public authorities are struggling to answer these questions.

The difficulties of measuring impact are not limited to the public sector. Businesses face very similar challenges. With regards to modern slavery statements, the area of reporting in which businesses consistently score worst is the organisation's effectiveness in ensuring that slavery and human trafficking are not taking place in its operations or supply chains. Is there any good practice which can be taken from the private sector?

The lack of impact measurement makes expenditure in this area very difficult to justify for public authorities. Politicians and citizens do not necessarily understand the long-term gains of sustained engagement in this work. As one official from Malmö pointed out:

"It is a real challenge to show that your work is worthwhile. It is much easier to justify in the case of green public procurement where there are concrete measurements. It is much harder to argue that citizens of Malmö should be paying to do audits in Bangladesh when you cannot measure the impact of your work".

Ulrika Svallingson, Malmö Municipality

Another issue is the lack of documentation about what public authorities are doing to ensure greater supply chain transparency in Norway and Sweden. While central authorities provide guidance and guidelines, there is no central resource centre where public authorities can document the steps that are working and those which are not. The Swedish Agency for Public Procurement funded a review of existing initiatives in 20 jurisdictions across Europe.⁷³ The International Learning Lab on Public Procurement and Human Rights – a global network to generate knowledge, tools and guidance on public procurement and human rights - is another useful resource for relevant stakeholders.⁷⁴ However more documentation is needed to inform future action.

LESSON 9. CLEAR DOCUMENTATION OF ACTIONS TAKEN

Data gathering is an important first step and public authorities and NGOs should record in a formalised way what measures and processes are being adopted. Several organisations have

documented specific cases or carried out surveys at a national level. For example, Electronics Watch produced a 2016 case study of the Swedish County Councils and Regions and the Dell Computer Corporation, highlighting the possibilities and challenges for public sector buyers in holding contractors accountable for failures to exercise effective due diligence. But these are too few and far between. A first step in the UK is for the Government to commission a comprehensive review of transparency initiatives in public sector supply chains across the country.

LESSON 10. DEFINING INTENDED OUTCOMES AND EFFECTIVENESS INDICATORS

There is a need for clarity on what the implementation of supply chain transparency initiatives is intended to achieve and how to assess effectiveness. Should public authorities measure their impact on business conduct or improvements in working conditions? What metrics should be used to assess this? There was very little evidence of impact measurements during the course of the trip. More studies are needed in this area.

9 WHAT IS NEEDED TO ADDRESS THESE CHALLENGES?

It is clear that collaboration and legislation could increase the public sector's ability to influence global supply chains. Two other ingredients are needed if there is any hope of addressing these challenges: resources and leadership.

When stakeholders in Norway and Sweden were asked what more was needed to increase the effectiveness of their work, there was a common refrain: resources. One individual even cautioned "If you don't have any resources, don't introduce the requirements". More funding would enable public authorities to carry out more sustained monitoring and evaluation and to build competencies and knowledge.

The example of the work carried out by the Swedish County Councils and Regions shows that much can be achieved on a relatively small budget. The network is financed by the county councils and has a modest budget to pay for staff and third-party audits.

Resources are very much dependent on political will. Officials explained that there is often a mismatch between the expressed desire by politicians to do something in this area and the allocation of resources. Governments in the region are focusing resources on the green initiatives, some argue to the detriment of the social agenda.

The question of price is one that requires political leadership. Some industries such as textiles and construction are based on unsustainable business models and as one commentator put it, "border-line criminal activities". But are governments and public authorities prepared to pay more for the goods and services they procure? While there is increasing recognition that public procurement should consider other policy objectives, this is not often mirrored in price considerations.

"We have a key question for authorities – how should we reward people who are doing the right thing? This is a political question".

PART III CONCLUSION AND RECOMMENDATIONS

10 CONCLUSION

Governments and public authorities have an important opportunity to use their joint buying power to create a demand for sustainable products and services. Greater transparency in public sector supply chains can drive improvements in business behaviour and ensure decent and fair conditions for workers. It can have political and potential economic benefits for public sector organisations. By showing a commitment to environmental and social sustainability, public authorities can create a values-based organisation and manage reputational and economic risks.

Transparency in public sector supply chains is an area of policy still in its infancy. Collaboration, leadership and legislation are needed to increase the influence of public authorities on global supply chains.

More public authorities need to be engaged in supply chain transparency work. Legislation is an important step to achieving this. The cases of Norway and Sweden show the limitations of self-regulation and the need for enforcement: while some public authorities are showing real leadership, it is difficult for a minority to create sufficient leverage on the global market. Likewise, the voluntary nature of Section 54 reporting requirements for public authorities is a missed opportunity for public buyers in the UK to create a sizeable influence on their global supply chains.

If, as the UK Government has signaled, it wishes to explore extending the scope of Section 54 to public authorities, the Norwegian and Sweden experiences offer some important lessons. To ensure that Section 54 is more than a tick-box exercise for public authorities, relevant actors in the UK should reflect on the challenges experienced by Norwegian and Swedish public authorities and consider how they can strengthen collaboration, leverage and competencies, harmonise requirements and measure impact.

Without strong political leadership and engagement from a wide array of stakeholders, these questions will remain unanswered. The UK Government has joined those of Australia, Canada, New Zealand and the United States in committing to tackle modern slavery in public sector supply chains. Now it is time to consolidate political promises with appropriate policies and tools to ensure that those working in public sector supply chains are treated decently and fairly.

COLLABORATION

How can collaboration between public authorities be facilitated to make TISC work less resource-intensive and more effective?

LEVERAGE

How can the power of public procurement be used to maximum effect?

COMPETENCIES

How can public officials be supported and equipped with competencies and knowledge to carry out this work?

HARMONISATION

How can frameworks and processes be consolidated nationally and internationally to create greater impact?

IMPACT MEASUREMENT

How can the actions of public sector organisations be documented and the impact of TISC initiatives measured to inform future actions?

11 RECOMMENDATIONS

THE UK GOVERNMENT SHOULD:

- Produce clear guidance for public authorities on modern slavery reporting, covering in detail how public authorities can approach requirements of Section 54, Part 5 (a-f);
- Commission a review of existing best practices and initiatives across the UK aimed at improving transparency in public sector supply chains;
- Explore opportunities for public authorities to share costs and improve collaboration, e.g. through the creation of a National Coordinator or an administrative tool to share information on processes and audits;
- Work with relevant stakeholders to continue developing training and competencies for public sector officials on modern slavery;
- Support sectoral initiatives for supply chain transparency in the public sector;
- Increase international cooperation and work on developing common frameworks for modern slavery and forced labour. In particular, it should:
 - Convene a global conference with business, civil society, governments, NGOs, and policy makers to work out a schedule for developing international standards on supply chain reporting;
 - Engage with governments (e.g. Australia) which have adopted modern slavery and TISC provisions for public entities to share best practice and guidance;
 - Collaborate with foreign governments to explore the potential for creating joint leverage for certain products considered high-risk.

PUBLIC AUTHORITIES SHOULD:

- Consider joining existing networks and monitoring groups on public procurement and human rights;
- Produce a TISC statement;
- Collaborate with neighbouring public authorities to assess and reduce risks of modern slavery in their supply chain;
- Ensure that sufficient resources are allocated to developing staff competencies;
- Document and share initiatives aimed at mitigating modern slavery risks in the supply chain.

NGOS AND ACADEMICS SHOULD:

- Continue to investigate the links between modern slavery and public procurement;
- Work with public authorities to develop competencies and policies to address human rights risks in global supply chains;
- Collaborate with international actors to increase understanding of risks in public sector supply chains.

BUSINESSES SHOULD:

- Share best practices on supply chain transparency initiatives with public authorities, including on how to measure the effectiveness of measures taken;
- Write a TISC statement which covers in depth the six recommended reporting areas and outlines year-on-year progress;
- Work with public authorities to design action plans in cases where human rights violations are found in the supply chain.

APPENDICES

APPENDIX 1: LIST OF RESEARCH QUESTIONS FOR PUBLIC AUTHORITIES

CONTEXT

1. What do you understand by the term Transparency in Supply Chains?
2. Can you explain any frameworks within your organisation for dealing with labour exploitation risks in your supply chains? Is there a broad focus on human rights or a narrower approach on the issue of modern slavery and forced labour?
3. What role do you think legislation has to play in achieving greater TISC?
4. What can be achieved outside of formal legislative structures, including through regulatory instruments and guidelines?

ACTIONS

5. Do you face significant risks of labour exploitation in your supply chains? If so, in which areas?
6. What initiatives have been developed by your organisation to tackle exploitative and abusive labour practices in your supply chain?
7. Why did you choose to develop these measures?

IMPLICATIONS

8. What do you think are the benefits and challenges of these initiatives?
9. Do you think that these initiatives have contributed positively or negatively to any of the following areas?
 - a) Security and resilience of supplies;
 - b) Compliance with national legislation and/or international guidelines;
 - c) Collaboration with other local authorities and government bodies;
 - d) International collaboration;
 - e) Partnerships with the private sector;
 - f) Public scrutiny and reputational damage;
 - g) Creativity within your organisation;
 - h) Engagement with a growing social and environment agenda.
10. What have you discovered about your supply chains by implementing these initiatives?

APPENDIX 2: LIST OF ORGANISATIONS INTERVIEWED IN SCANDINAVIA

ORGANISATION	DESCRIPTION	COUNTRY
Atea	ICT infrastructure company	Sweden
Christian Council of Norway	Faith organisation	Norway
Confederation of Danish Industry	Business organisation	Denmark
Copenhagen Municipality	Local authority	Denmark
Danish Business Authority	Public body	Denmark
Electronics Watch	Independent monitoring organisation	Sweden
Factlines	Consultancy	Norway
IEH - Ethical Trade Initiative Norway	Multi-stakeholder initiative	Norway
IKEA of Sweden AB	Furniture company	Sweden
Krypos	Public body	Norway
Legal, Financial and Administrative Services Agencies (Kammar Kollegiet)	Public body	Sweden
Lightup	Non-profit organisation	Norway
Municipality of Malmö	Local authority	Sweden
Municipality of Bergen	Local authority	Norway
Municipality of Oslo	Local authority	Norway
Norwegian Bar Association	Professional body	Norway
Norwegian Confederation of Trade Unions (LO)	Labour union umbrella organisation	Norway
Norwegian Directorate of Public Construction and Property (Statsbygg)	Public body	Norway
Norwegian Ethics Information Committee	Government ah-hoc committee	Norway
ROSA Project	Non-profit organisation	Norway
Skanska	Construction company	Sweden
SKL Kommentus	Central purchasing body	Sweden
Swedish County Councils and Regions Network	Public body	Sweden
Swedwatch	Non-profit organisation	Sweden
The Agency for Public Management and eGovernment (Difi)	Public body	Norway
The Danish Institute for Human Rights	Non-profit organisation	Denmark
The Rafto Foundation	Non-profit organisation	Norway
Trier Law	Law firm	Sweden
UN Office for Project Services (UNOPS)	Operational arm of the UN responsible for procurements	Denmark

APPENDIX 3: DESCRIPTION OF HIGH-RISK PRODUCT GROUPS IN PUBLIC PROCUREMENT

HIGH-RISK PRODUCT GROUPS	DESCRIPTION OF POTENTIAL HUMAN RIGHTS VIOLATIONS
Coffee, Tea and Cocoa	Labour-intensive industries which involve work by smallholder farmers across Africa, Asia and Latin America. Debt bondage, labour exploitation, low wages, the withholding of salaries and child labour are commonplace.
Construction materials	Stone quarrying and timber production is mainly carried out in developing countries in South East Asia, Africa and Latin America, in the case of the former particularly in China. Low wages, excessive overtime, lack of health and safety procedures, restrictions on freedom of association and child labour are some of the risks involved.
Cut flowers	A proportion of cut flowers in Europe are imported from Latin American and African countries. Excessive overtime, use of dangerous chemicals, child labour and discrimination against women have been documented.
Electronics & ICT	The electronics industry has very complex supply chains and many layers of subcontracting. Human rights risks in the electronics industry are present at both the production stage (hazardous health and safety conditions, use of migrant and student workers and excessive hours) and in the mining of raw materials (child labour, use of conflict minerals).
Furniture	While risks vary greatly between items and a large proportion are manufactured in Europe, the sourcing of raw materials can involve human rights violations, including labour exploitation and insufficient remuneration.
Medical supplies	A large percentage of medical supplies including surgical instruments and rubber gloves are produced in countries where labour exploitation has been documented, including in China, Malaysia and Pakistan. Risks include excessive overtime, discrimination against migrant workers, child labour and a lack of freedom of association. The use of sub-contractors is widespread and there are risks associated with the mining of raw materials.
Toys and sports equipment	Many toys and sports equipment are imported from Asian countries where poor labour conditions including the use of child labour and excessive overtime have been reported. Risks are dependent on the product category as larger play items such as slides tend to be manufactured in Europe.
Textiles, work wear and footwear	Strong price competition and complex layers of sub-contracting characterise the fashion industry. Clothes are most commonly made in countries where production is cheap and there is a risk of exploitation including in Bangladesh, Cambodia, China, India and Vietnam. Risks at the manufacturing stage include hazardous health and safety conditions, child labour, excessive overtime, low wages, sexual exploitation and restrictions on freedom of association. There are also modern slavery risks associated with raw material extraction, particularly state-sponsored cotton picking in Uzbekistan and Turkmenistan.
Tropical fruit	The harvesting of tropical fruit such as bananas, mangos and pineapples is labour-intensive and occurs mainly in Central and Latin America and Africa. Precarious work, exposure to toxic chemicals and restrictions on freedom of association are potential human rights violations.

Source: Adapted from the Norwegian Agency for Public Management and eGovernment's (Difi) High-Risk List

APPENDIX 4: SECTION 54 AND PROPOSED AMENDMENTS OF PMB

Summary of Section 54 of the UK MSA & Proposed Amendments of Modern Slavery (Transparency in Supply Chains) Bill

ISSUE	CURRENT LEGISLATION	PROPOSED AMENDMENTS
Scope	Commercial organisations with a turnover of £36 million are required to report. Public authorities are not with the exception of certain public bodies that are subject to the Public Contracts Regulations (mostly universities and other Higher Education establishments).	Commercial organisations with a turnover of £36 million and public authorities should be required to report.
Slavery and human trafficking statement	An organisation can make: (a) a statement of the steps it has taken during the financial year to ensure that slavery and human trafficking are not taking place or (b) a statement that it has taken no such steps.	An organisation should be required to “comply or explain” i.e. to give reasons for its choice to make a statement that it has taken no steps to mitigate modern slavery risks.
Reporting areas	Organisations may report on the six areas outlined in part 5 of Section 54.	Organisations must include information on the six areas of reporting outlined in part 5 of Section 54.
List of companies required to report	No list of in-scope companies.	The government must publish a list of all commercial organisations required to report under Section 54. It must be produced in an accessible format and location, and companies categorised by sector.
Due diligence by public authorities	Non-compliant commercial organisations are not excluded from the procurement process.	Economic operators that are not compliant with Section 54 should be excluded from procurement procedures.
Guidance	The Secretary of State may issue guidance for commercial organisations.	The government must publish specific guidance on TISC reporting requirements for public authorities.

Source: Author’s own elaboration

APPENDIX 5: LET'S MAKE IT WORK INITIATIVE

The *Let's Make It Work* (LMIW) initiative was devised in autumn 2017 by Baroness Young of Hornsey to raise awareness of Section 54 of the Modern Slavery Act 2015 on Transparency in Supply Chains. By working with a wide range of partners, including academics, businesses and NGOs, the initiative has the following aims:

- To raise awareness of Section 54 of the Modern Slavery Act;
- To support companies to improve the standard of TISC reporting through meetings, workshops, roundtables;
- To encourage more companies to comply with the law and submit their reports;
- To encourage public bodies to devise and implement TISC reports.

Since September 2018, the *Let's Make It Work* team has been working from UK Parliament to have an impact across a range of industries which fall under the scope of the Act. The initiative has engaged with a number of different sectors, including construction, fashion, food, hospitality and sport. The LMIW team has been involved in the following activities:

FASHION ROUNDTABLES

A series of three roundtables were held for the fashion industry in the House of Lords in 2017 and 2018. The sessions focused on the implications of Section 54 for the sector. The first session looked at what constitutes a good modern slavery statement, the second session at why brands should take their statements seriously and the third session at how brands can make the most of the legislation.

APPG ON SPORT, MODERN SLAVERY AND HUMAN RIGHTS

The All-Parliamentary Party Group on Sport, Modern Slavery and Human Rights was created in autumn 2018 to examine human rights problems affecting large scale-sporting events around the world.⁷⁵ The purpose of the group is to bring together athletes, industry experts, parliamentarians and policy makers and to focus on three specific areas of discussion: the human rights impacts of the cycle of mega-sporting events, the effect of the UK Modern Slavery Act on professional sport companies, and discrimination in sport in all its forms.

THE GOOD, THE BAD AND THE UGLY: AN ASSESSMENT OF MODERN SLAVERY STATEMENTS

The LMIW team has conducted an analysis ("The Good, the Bad and the Ugly") of modern slavery statements across eight sectors. The analysis focuses on statements from sectors where the risk of exploitative labour practices is well known, for example fashion, with other sectors which have received less public scrutiny of their supply chains, for example transport and football. Without naming and shaming, the report - due to be published in early 2020 - exposes the gap between the leaders in the field and those lagging behind and makes recommendations on how the quality and compliance of modern slavery statements can be improved.

COLLABORATION WITH UNIVERSITIES

The LMIW team has engaged with academics on the subject of TISC to discuss findings on supply chain research and to discuss practical applications for different sectors. In June 2018, a research session was organised on modern slavery and public procurement. In February 2019, an event was hosted for the tea industry to discuss the University of Sheffield's research on labour exploitation in the tea supply chains. The team has also worked closely with the University of Nottingham's Rights Lab.

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60 The Swedish Ministry of Finance, *National Public Procurement Strategy*, 2017, available at https://www.upphandlingsmyndigheten.se/globalassets/english/procurement/national_public_procurement_strategy_english_web.pdf.

61 Op. cit., Swedwatch, 2015.

62 The South-Eastern Regional Health Authority is one of four regional health authorities in Norway and is the strategic unit that owns the hospital trusts in the region.

63 Electronics Watch, *Public Procurement and Human Rights Due Diligence to Achieve Respect for Labour Rights Standards in Electronics Factories: A Case Study of the Swedish County Council and the Dell Computer Corporation*, February 2016, http://electronicswatch.org/en/public-procurement-human-rights-due-diligence-a-case-study-of-the-swedish-county-councils-and-the-dell-computer-corporation-february-2016_2456642.pdf.

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65 ETI Norway is developing a pilot project for Norwegian public authorities to share the workload on different high-risk product groups.

66 Op. cit. Martin-Ortega O et al., 2018.

67 Procura+ is a network of European public authorities and regions that connect, exchange and act on sustainable and innovation procurement, <http://www.procuraplus.org/>.

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72 See Clean Clothes Campaign, *Fig Leaf for Fashion. How social auditing protects brands and fails workers*, September 2019, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>.

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74 For more information, see <https://www.hrprocurementlab.org/about/>.

75 During the 2017-2019 parliamentary session, the Group was co-chaired by Alex Norris MP and Baroness Young of Hornsey; Lord Colin Moynihan and Kerry McCarthy MP acted as Vice-Chairs. The UN Global Compact Network UK and the Institute for Human Rights and Business (IHRB) provide secretariat for the group. For more information, visit <http://www.appgshr.org.uk>.