

Modern Slavery Response and Recognition in Built Environment

Altop Internal Training

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Part I

1. Background

"Modern slavery" is an umbrella term used to describe an array of related criminal practices, including human trafficking, forced and compulsory labor, bonded labor, and sexual or criminal exploitation, among others. In general, in these situations, one person is in a position of extreme power and acts as an "owner" of another person. It's estimated that some 46 million people — about 0.5% of the global population — today suffer under some form of modern slavery. Modern slavery is a serious violation of human rights with significant negative physical and mental health consequences.

Firms with long, complex supply chains may be unaware that slavery exists several stages away from their "visible" supply chain. Even firms with high-tech supply chains may find that raw materials are sourced from areas with a high risk of forced labor practices. And the financial, insurance and accounting industries may commonly recruit or retain — either directly or through a third party — lower-skilled and lower-paid workers to provide construction, janitorial, catering, call center or other services.

2. What is Modern Slavery:

lavery occurs when one person completely controls another person, using violence or the threat of violence, to maintain that control, exploits them economically and they cannot walk away.

The Trafficking Victims Protection Act of 2000 (TVPA) defines slavery as "The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery."

These are real slaves by the harshest definitions. They are trapped in brothels, factories, mines, farm fields, and restaurants. More than half are women and children.

3. Types of Modern Slavery:

BONDED LABOR

People become bonded labourers by taking or being tricked into taking, a loan that they are unable to ever pay off. Some bonded labourers receive basic food and shelter as "payment" for their work, but due to penalties and exorbitant interest rates, no matter how hard they work they are never able to pay off the loan, which can even be passed down to their children. –International Labor Organization (ILO)

FORCED LABOR

People who are illegally recruited by individuals, businesses or governments and forced to work – usually under the threat of violence or other penalties. –ILO

EARLY & FORCED MARRIAGE

Predominately affects women and girls who are married without choice, forced into lives of servitude, often accompanied by physical violence, and who have no realistic choice of leaving the marriage. Marriage involving children under 18 years old remains a widely culturally accepted practice in many corners of the globe. Estimates suggest that 11 per cent of women aged between 20 and 24 worldwide were married before reaching

the age of 15 –UNICEF 2012

TRAFFICKING

Involves the transport of any person from one area to another for the purpose of forcing them into slavery conditions, including transporting people between countries and within the borders of a state. –Trafficking Victims Protection Act (TVPA) of 2000

CHILD SOLDIERS

The unlawful recruitment or use of children—through force, fraud, or coercion—by armed forces to serve as combatants or for other forms of labor. Some child soldiers are also sexually exploited by armed groups. Perpetrators may be government armed forces, paramilitary organizations, or rebel groups. –Trafficking Victims Protection Act (TVPA) of 2000

DOMESTIC SERVITUDE

People are forced to work 10-to-16 hours a day or more for little-to-no pay. The employer uses force, fraud and/or coercion, usually, the threat of deportation and/or document confiscation, to maintain control over the worker and to cause the worker to believe that he or she has no other choice but to continue with the work. –ILO

4. *Facts about slavery*

SLAVERY

Victims work as: domestic servants; farm, factory, and restaurant laborers; strippers, hostesses, and sex slaves; sales crews, peddlers, and beggars; hotel and tourist industry workers.

SLAVES TODAY

It is reported that 40.3 million slaves are in the world today. 403,000 of them are in the United States. (Global Slavery Index 2018)

MOST PREVALENT

Modern slavery is most prevalent in Africa, Asia, and the Pacific Region (2018).

FEMALE

Of the 600,000–800,000 people trafficked across international borders each year, more than 70% are female and half are children.

TRAFFICKED

As many as 14,500–17,500 men, women, and children are trafficked into the United States each year. (US Department of State, 2005)

LARGEST

Human trafficking is estimated to be the third-largest international crime industry, ranking behind illegal drugs and arms trafficking. (United Nation’s Office on Drugs and Crime)

INDUSTRY

Human trafficking is the fastest-growing criminal enterprise in the 21st century—a \$32 billion industry. Of that, \$15.5 billion is made in industrialized countries. (ILO)

U.S. IS TOP

The United States is one of the top three destination points for enslaved/trafficked victims, along with Japan and Australia.

5. *Identifying slavery*

SIGNS THAT SOMEONE MAY BE ENSLAVED

Unable to leave their job.

Does not control their earnings.

Owe a large debt and are unable to pay it off.

Not in control of their own identification documents (ID or passport).

Have their communication restricted or controlled and are frightened to speak in the presence of others.

Have injuries, signs of physical abuse, and/or torture.

Exhibit behaviours including fear, anxiety, depression, submission, tension, and/or nervousness.

Unable to move freely or are being watched or followed.

Work excessively long and unusual hours.

WHY DON'T THE ENSLAVED TRY TO ESCAPE?

The oppressor threatens to come after them or their family if they attempt to escape.

Victims are told that they will be deported or put in jail if they leave because their oppressor has stolen their documents.

Deportation for a victim means retribution by the trafficker, as most traffickers have a web of conspirators in the victims' home countries willing and able to get even.

Many victims fear retribution through black magic or physical and sexual abuse, among many other threats and promises made by their captors.

In many cases, particularly where slavery is historic and generational as in many villages in India and Africa, people do not realize they are enslaved.

IF AN ENSLAVED VICTIM DOES ESCAPE...

Their limited language skills, unfamiliarity with the area and poor physical and mental health, due to their enslavement, can leave them helpless on the streets – vulnerable to falling prey to their traffickers once again.

With no money, no documents to prove their citizenship and limited skills, they are unable to earn a living and get themselves out of their situations.

Many victims are unaware of their rights or the fact that there are organizations available to assist them to freedom.

Part II

1. Key risk factors for modern slavery in global supply chains

hazardous work

low-skilled workforce

migrant workforce

complex product supply chains

labor contractors, middlemen, recruiters

Source: Verité and the Department of Labor, Grace Farms analysis

2. Construction industry has the highest risk of forced labor.

However, our construction is the largest global industrialized sector and at the highest risk of forced labor.

Opacity in the Construction Sector

The construction industry is the least modernized and most disaggregated industry, accounting for more than 13% of global GDP. It's also a major offender of using forced labor on construction projects around the world. At this historic time of confronting social injustices, industry leaders are mobilizing the industry to employ ethical construction practices, including using slave-free materials.

The construction sector is the largest industrial sector in the world, the most disaggregated, and the least modernized

3. *We Must Assess Risk*

There is legal and business exposure as well as danger in ethical passivity for turning a blind eye to forced labor in building materials. Governments around the world are insisting on anti-slavery transparency disclosures, and criminal and civil enforcement actions are ever more likely. Seizure of slave-made goods made possible by new laws in some countries can create costly project delays. Our response to risk begins by having conversations about our values, and how to embed those values into our business conduct.

Modern Slavery Act of 2018 | Australia

In 2018, the Australian government passed the Modern Slavery Act, requiring businesses based or operating in Australia, with an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains. The annual reports are publicly filed and maintained in a repository known as the Modern Slavery Statements Register. See, Modern Slavery Act, No. 153, Simplified Summary of Act, Part 1, Section 3.4

Slavery is illegal in every country.

Countries are moving to make corporations more accountable.

State of international government oversight of ethical supply chains and the construction sector:



178 jurisdictions are parties to the United Nations’ Trafficking Protocol’s⁶ call for prosecution, protection, and prevention. Supplementing other jurisdictions’ reporting-based laws, the U.S. is using its tariff authority to prevent any products made with forced labour from entering the country

4. *Must be ensure that:*

By choosing to use only forced labor-free work products, to diligently examine supply chains and not simply rely on assurances that labor forces are free of exploitation, design and construction industries would move into the forefront of sectors seeking to build (or rebuild) a world that does not rely on the exploitation of some for the benefit of others.”

Access to worksites to look for indicators of forced labour may be made difficult by government policy, irregular governance, remote locations, or unwilling owners, so reliance upon static and certification programs operating under such restrictions may create high-risk situations relating to forced labour.

5. *Now is the time to include slave-free criteria in our industry code of ethics*

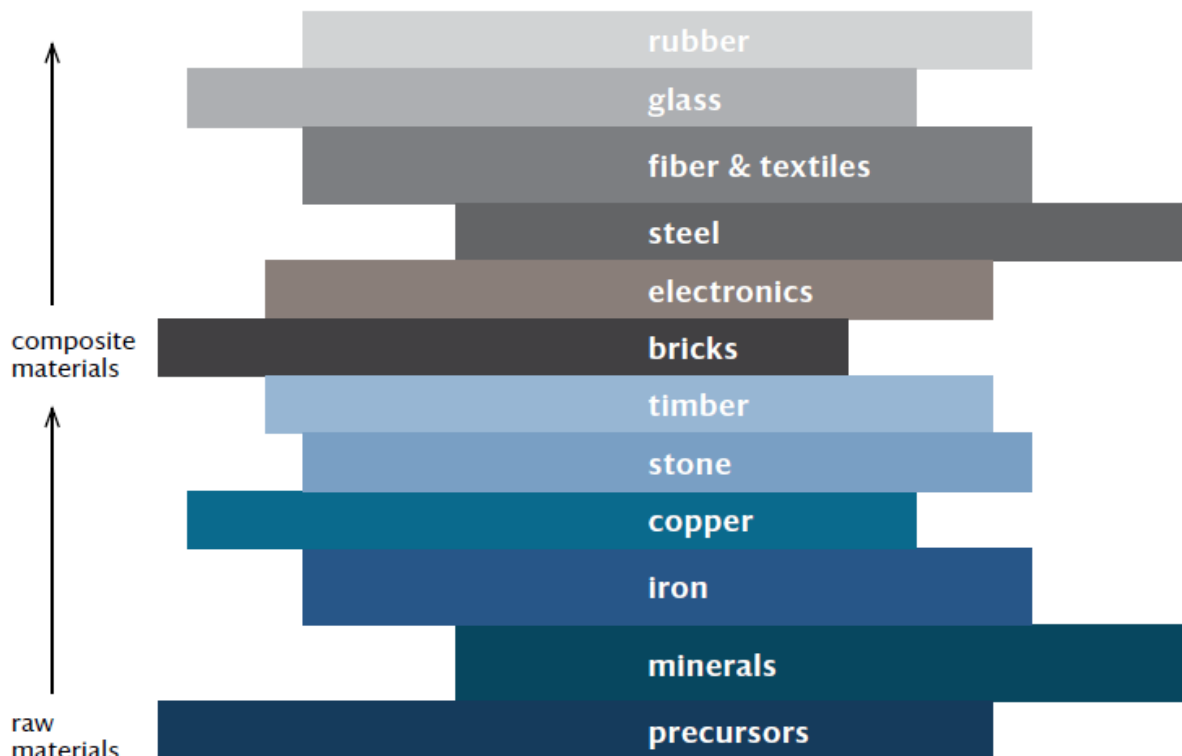
The disaggregated and opaque nature of the construction industry makes it easy to exploit workers. Forced labour and inexpensive and no-cost labour subsidizes a project’s return on investment (ROI). The complexity

and the thousands of unique raw and composite materials per building make it nearly impossible to purchase slave-free materials. But a growing list of risky raw and composite materials, as well as global “hot spots,” can provide navigation to make ethical decisions. Working examples, conducted by Grace Farms internally and for engineering classes at Princeton University, also provide real-world examples of how ethical decisions can be built into the design and construction process.

6. Mobilizing the Full Ecosystem of the Built Environment

There are currently more than 30 supply chain transparency resources and reporting mechanisms as a starting point for obtaining insights into one’s supply chains

raw and composite materials at the highest risk of embedded slavery



Source: Verité Commodities Atlas and the U.S. Department of Labor’s List of Goods Produced by Child Labor or Forced Labor, Grace Farms analysis

Know the source, lessen your risk

One of the key proposals throughout this report is the necessity of harnessing and mobilizing the full ecosystem of the global design and construction industry to eliminate forced labour from the building materials supply chain. Expert architects/specifiers are incorporating rigorous specifications and auditing standards in the procurement process, while leading attorneys combating forced labour abuses discuss strategies companies can use, including contractual language, to help make ethical material purchases. The excuses of not knowing or thinking forced labour is another company’s problem are increasingly much harder to hide behind.

6.1 Who influences the building supply chain?

6.1.1 Media, Artists & Activists Awareness

Achieving ethical supply chains will require mobilizing the full ecosystem of the global design and construction

industry, harnessing the power of innovators and leaders to not only test and model solutions, but to collaborate and share information, integrating slave-free criteria at intervention points within the ecosystem.

Such intervention points include contracts, specifications, procurement decisions, procurement software, documentation, and auditing of construction materials. The steps to confront slavery in the built environment should include how we incentivize the industry to collect data and develop industry-wide standards and best practices, including company-wide education on ethical procurement policies, and closing legal and policy loopholes that perpetuate the illegal use of forced labour.

6.1.2 Government, Legal & Financing Contracts & Laws

"Forced labor has no place in our global supply chains nor in the goods and services we buy every day. Only by insisting on transparency in building materials can a builder or architect know that they are not importing exploitation into a project."

— Amb. (ret.) Susan Coppedge, Krevolin & Horst, Former U.S. Ambassador at-Large to Monitor and Combat Trafficking in Persons

6.1.3 Owners & Developers Owner Project Requirements (OPR)

"It's not enough to build projects with socially responsible programming. How we build is also important. We have a moral obligation to pay attention to how our buildings go together, how materials are made, and where they come from. We probed our supply chain and began asking questions about what role we want to play in creating an environment our children will inherit."

— Jhaelen Hernandez-Eli, SVP, Head of Design and Construction Division, New York City Economic Development Corporation

"Lendlease is a signatory to the United Nations Global Compact and is striving to implement the Ten Principles of that compact. We are committed to taking steps to help mitigate modern slavery risk and have commenced work on several initiatives, taking an enterprise-wide approach. Given the scale of our supply chain, however, mitigating the risks of modern slavery is a complex undertaking and will need to be staged over time."

— Paul Bradley, Global Supply Chain Manager, Lendlease (U.S.)

6.1.4 Architectural Design Team Design Architect, Architect of Record, Landscape Architect, Engineers, Lighting, Acoustics, Building Envelope, Additional Consultants Specifications

"As lighting designers and building engineers, we specify an array of complex technical devices. For a given project, the component parts easily sum to the thousands. Each part touches many hands from material extraction to on-site products. Our Grace Farms team shed light on human rights abuses through the construction materials procurement process. It is incumbent upon the design and construction community to demand transparency and reject these practices. Further, the scale of our industry demands the creation of a system that qualifies ethically sourced materials, thereby ensuring the health and wellbeing of all people contributing to our built environment. We will deliver."

— Gabe Guilliams, Principal, Lighting Specialist, Buro Happold Engineering

6.1.5 Construction Team General Contractor, Construction Managers, Subcontractors Procurement & Documentation

"We searched for ways to infuse our designs with qualities which would give the contractors no choice but to do things ethically ... But, without a paradigm shift, enforcing these standards will remain a nagging source of disagreement which results in compromises in schedule, budget, and quality."

— Adam Saltzman, Director, MASS.Build

6.1.6 Manufacturers & Logistics Fabricators, Suppliers, Extractors, SC Mgmt, Auditors Certifications & Auditing

"At Herman Miller, we design for the good of humankind. We believe in using business as a force for good, and throughout our history have been at the forefront of creating industry standards for a better world. We're proud to be associated with Design for Freedom and are committed to working with our stakeholders to ensure the

development of an ethical supply chain within the ecosystem of the built environment."

— Debbie Propst, President, Herman Miller Retail”

6.1.7 Industry Associations & Universities Education

“The Design for Freedom report is essential reading for everyone involved in the design and construction industry. As a complement to the AIA Code of Ethics, which asserts that members should uphold human rights in all their professional endeavors, this report provides invaluable perspectives that underscore an architect’s obligation to enhance and facilitate human dignity and the health, safety, and welfare of everyone who uses, as well as creates, their buildings. AIA New York is a proud participant in the Working Group that has created this report, and through this work, we will continue to encourage AIA members to understand their pivotal role in ending forced labor.”

— Benjamin Prosky, Executive Director, AIA New York Chapter | Center for Architecture “Workers are still not represented in emerging Integrated Project Delivery (IPDs) as part of the project team. Similarly, workers are not represented on teams across industries in the supply chain, beyond the construction site, including manufacturing facilities and architecture offices, to name a few.”

— Kadambari Baxi, Barnard College, Professor of Professional Practice in Architecture, Co-Founder,

6.1.8 Media, Artists & Activists Awareness

“Borrowing from the green building movement — which has promoted environmental product declarations and lists of materials that don’t have a negative impact on human health or the planet — the [Design for Freedom Working Group] is pushing for transparency in the sourcing and manufacturing of materials; it plans to develop a list of “slave-free” building products. And drawing on a broad coalition of experts and activists

••• they are raising awareness of the exploitation of labor among those who influence every stage of construction, from owners and lenders to designers, engineers, and consultants to contractors and product manufacturers. They are looking to intervene through any possible channel to prevent those who specify from ordering building products that can’t be certified as made without forced labor. And they are actively pursuing a pilot project to test constructing a certifiable slave-free building.”

— Cathleen McGuigan, Editor-in-Chief, Architectural Record

“Where Do Building Materials Come From?” Architectural Record, Oct. 1,

Part III Take action steps

1. Take action steps by Practitioners

Once you know what your supply chain is, are aware of the risk of modern slavery, and have made the decision to confront it, what can an architect, engineer, designer, contractor, or fabricator do? What can be done at the firm level? At the project level?

- Replicate your own learning journey for your colleagues and peers. Educating those within your own organization provides a shared appreciation of both the moral and legal risks, and can help to socialize the incorporation of ethics into business processes.

- Adopt an ethical sourcing policy, driving its adoption to subcontractors through contract language, and monitoring their compliance just as you would monitor health and safety or quality compliance — whether with in-house systems or through third-party auditors. If there is an abusive manager, take prompt action to send a message of trust and consequences: “zero tolerance” is meaningless if it is just a slogan, since perceived hypocrisy can undo even the most carefully designed standards regime.

- Publicize your policy, not only to help spread the word among other industry leaders and to differentiate your firm from competitors who choose not to confront their slavery footprint, but also to demonstrate your commitment to transparency. Leverage your policy and what you do to carry it out to educate clients, not only on why ethical design and construction are necessary, but why any additional costs are worth it in the long run.

- Participate in industry efforts, especially those which incorporate workers into the process as full stakeholders. Work within industry organizations, as well as with governments and financiers, to achieve policies that incentivize slavery-free building through tax benefits, bond consideration, and beneficial scoring that is not wholly dependent on the lowest bid.
- File public disclosures. Major firms might have to file public disclosures under the Supply Chain Transparency and Modern Slavery Acts mentioned in the “Mobilizing the Full Ecosystem of the Built Environment” section and companies with federal contracts will have to meet the requirements set forth in the Federal Acquisitions Regulation. Even if you don’t meet the filing thresholds, doing your own version of a disclosure (setting forth your anti-slavery commitment, how you shield against it, train your staff, and monitor compliance) will give you an advantage in subcontracting with the actors who are big enough to have to file, or are subbing out parts of federal contracts. By showing that they are working with you — an ethical firm — they are one step closer to demonstrating compliance to regulators and contracting officers

2. Take action steps by stakeholder

2.1 Owners, Developers & Investors

OWNER’S PROJECT REQUIREMENTS (OPR) & CONTRACTS:

Add a slave-free materials requirement to the OPR

Add a slave-free materials requirement to the OPR

Add a contract clause to establish:

- Expectation to examine project supply chain
- Right to review efforts to be made
- Preferably require specific reports on efforts and impacts, not just pledges and policy changes without implementation

Complete ACAMS and FAST Initiative Certification by the following:

- Compliance officers
- Risk managers
- Technology officers
- Industry consultants
- ESG specialists

Invest in a supplier audit of high risk raw materials

Participate in industry pledges

Join the Design for Freedom movement and social media campaign

Architectural & Design Teams

SPECIFICATIONS

Heighten requirements for slave-free materials in the specification process

Prefer raw and composite materials that are certified to be made without forced labour

Reassess what is in your Materials Library, add important new resources about ethical building materials and supply chains and inquire whether each material is fabricated without forced labour

Develop a decision matrix for how to choose inputs and suppliers when conditions are unknown

Determine expectations for change among suppliers, assuming many have problems and cannot or will not change quickly

Ensure your contract includes a substantial completion relief clause and includes expectations and the right to review

Add anti-slavery education to your firm’s “Lunch and Learn series” and other continuing education opportunities

Participate in industry pledges and the AIA Code of Ethics

Join the Design for Freedom movement and social media campaign

2.2 Construction Teams

PROCUREMENT & DOCUMENTATION

Heighten the requirement for slave-free materials in the procurement process and prefer raw and composite materials that are certified to be made without forced labour

Ask all suppliers to provide Supplier Codes of Conduct and Certifications for all tiers in their supply chain

Determine ways that your procurement approaches might contribute to the problem (timing, order changes, price pressures, etc.) and adopt

Demand attention to labour issues among any/all certification initiatives of suppliers/products

Audit your supply chain with third-party experts

Add anti-slavery education to your firm's "Lunch and Learn series," and other continuing education opportunities

Participate in industry pledges and Building Responsibly Worker Welfare Principles

Join the Design for Freedom movement and social media campaign

2.3 Manufacturers & Importers

PROCUREMENT & AUDITING:

Include anti-slavery requirements for all tiers in the supply chain for each material, raw and composite, in a Supplier Code of Conduct

Require auditing of forced labour in the materials supply chain, including manufacturing/fabrication and raw material inputs

Emphasize risks for any migrant workers at points of the supply chain through accountability measures for suppliers and their recruitment agencies

Include expectations for remediation of harms associated with suppliers, including the return of fees paid by migrants that lead to debt bondage

Participate in industry advocacy with the government for better, more just policies related to migrants and other vulnerable communities in your supply chain

Add anti-slavery education to your firm's "Lunch and Learn series," and other continuing education opportunities

Participate in industry pledges

Join the Design for Freedom movement and social media campaign

2.4 Architecture, Design, and Construction Faculty & Students

AWARENESS & RESEARCH:

Add anti-slavery criterion into all modeling, materials examination, and projects

Reassess what is in your materials library, add important new resources about ethical building materials and supply chains, and inquire whether each material is fabricated without forced labor

Incorporate labor/social issues into environmentally-driven research and certification systems

Sponsor and Collaborate on forced labor research and other abuses associated with construction materials

Participate in policy initiatives that promote better migration policies that prevent, rather than facilitate, trafficking risk for migrants

Add anti-slavery education to faculty meetings, "Lunch and Learn series," and other continuing education opportunities

Advocate for universities to build slave-free

Join the Design for Freedom movement and social media campaign

2.5 advices for company/ entity to resist modern slave

2.5.1 The appropriate standards around forced labour and human trafficking that design and building professionals should promote and enforce with suppliers have already been developed in hard and soft law — an extensive body of standards and due diligence approaches — that have been tested over many decades. Various multi-stakeholder initiatives, certification bodies, industry associations and collaborations, and advocacy efforts have created monitoring mechanisms, benchmarks for performance, and other tools that provide a roadmap for how buyers can work with suppliers in any country and for any commodity or building input. Due to the work described above, adopting standards to which all business parties are held accountable is relatively straightforward; it is the change management process within supply chains that requires long-term commitment, creativity, resources, and persistence.

2.5.2 The specific processes a company needs to put in place will naturally depend on the size and complexity of the company's supply chain and its inherent risks, and legal or other obligations that may apply. Companies may want to manage the processes entirely in-house or may choose to outsource some (e.g. audits) or all of them to specialized third parties.

2.5.3 Labour abuses are so common across sectors, and in both rich and poor countries, that one should really approach them as a feature rather than a bug in the system. As a result, many companies in your value chain will have business models built around routine violations of wage and hour laws, exploitative guest worker programs, systemic ill-treatment of vulnerable groups, and other structural conditions that have made modern forms of slavery shockingly pervasive. You will need to work with your

2.5.4 suppliers and industry peers to compel and incentivize changes in business models that have labour abuse baked into the prices and practices.

2.5.5 Setting Up a Risk Management System Implementing effective management systems is the foundation for combating trafficking in your supply chain, as they are based on the realistic assumption that change is an incremental process that requires routine monitoring, adaptation, and a clear set of performance metrics. Fostering improvement over time requires a systems approach to risk management known as 'Identify, Evaluate, Control, and Monitor.' This is a set of processes that a company should implement to identify the risks of human trafficking in its supply chains to address identified issues, implement enduring solutions, and monitor supplier performance over time.

2.5.8 Establish a Supply Chain Code of Conduct The first element of a management system is to clearly communicate expectations in all contracts and vendor agreements, usually through a Code of Conduct. A Supply Chain Code of Conduct establishes basic performance expectations for subcontractors, suppliers, and agents.² It is important that your firm's sourcing policy or Code of Conduct explicitly prohibits human trafficking and sets out protections and remediation for workers. A firm's code should also address factors that are "enablers" or contributors to situations or risks of human trafficking. A subsequent Social Responsibility Agreement affirms compliance with contractors, suppliers, or agents to your Code of Conduct and applicable legal requirements. It can be a standalone document or included as an appendix to a contract

2.5.9 Set Expectations for Responsible Hiring and Recruitment Human trafficking risk is most often associated with exploitative labor recruitment systems that charge vulnerable workers for their jobs and bind them in other ways that result in a condition called debt bondage. A robust due-diligence screening process for labor recruiters and current and potential suppliers, including clear metrics, will minimize the risk of fraudulent or misleading practices. So, it is particularly important that companies proactively ask suppliers and labor recruitment agents questions about recruitment and hiring performance metrics and share benchmarks based on a company's policy. Clear performance indicators enable accurate evaluation over time to determine if genuine improvements are made in the recruitment practices of suppliers. Key areas to look for include transparent policies and procedures that relate to:

- Transportation expenses
- Training expectations and costs
- Immutable contract of employment in appropriate languages
- Prohibition of retention of personal documents (including passports)
- Prohibition on deposits that bind workers to an employer
- Clear standards for humane treatment
- Appropriate discipline and termination systems
- Freedom of movement and personal freedom
- Grievance procedures
- Expectations for workplace equality across ethnicity, gender, and other categories
- Fair wages and benefits Companies need to obtain enough information about

the procedures above to have reasonable confidence that the supplier or labor recruiter will comply with its legal requirements and standards.

- Ensure that NONE employee is not below the minimum age legally required for the relevant kind of work in the jurisdiction.

2.5.10 Regularly evaluating the strengths and weaknesses of suppliers' and subcontractors' anti-human trafficking policies and procedures will help highlight where more improvement is needed. In evaluating how well a supplier is controlling its risks, a company needs to look for either the presence or absence of good practices and 'at risk' practices. Screening tools can be used to choose suppliers, develop corrective action plans, or to establish key performance indicators (KPIs) to track ongoing social responsibility performance.

2.5.11 First-Person Feedback A supply chain due diligence system is only as good as the information gained from workers at various levels of the supply chain. Robust compliance efforts include worker input through direct interviews or other confidential feedback mechanisms. Workers know conditions best, and effort and time must be devoted to gaining their trust and learning their needs and aspirations, as well as the problems they face. Input from nongovernmental organizations and trade unions can also help to better understand the conditions workers face.

2.5.12 Auditing as an Emerging Tool for Change Audits can be used to understand and document abuses and to drive change in fundamental business practices. Audits should prioritize substantial, confidential worker input. Audits should always link to corrective action plans to correct for violations found during an audit, although it should be acknowledged that many problems (especially those associated with forced labour) are not easily remediated and require sustained engagement and new ways of conducting business that reward compliance rather than expect it, without changing underlying dynamics in that market. Buyers should also note that many auditors are not well-trained to spot forced labour risk and that often the "scope of work" for an audit and the rigid procedures followed by many auditors result in few or even no findings of forced labour risk, even when suspect practices are widespread. Careful screening and ongoing quality control of auditors are also vital.

Recourses:

<https://onlinelibrary.wiley.com/doi/epdf/10.1111/tct.13011>

Wiley Online Library

<https://legal.thomsonreuters.com/en/products/compliance-learning/training-courses/modern-slavery-training>

THOMASON REUTERS

https://www.voices4freedom.org/get-educated/?gclid=Cj0KCQjw39uYBhCLARIsAD_SzMSXALM6u7AWWghuM3pQFsJE04b3fA9tX951yacYFOgbH6EM_MLg49caAjsrEALw_wcB

VOICES 4 FREEDOM

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