



Ethical Engagement Meeting

The Food Network for Ethical Trade – 13th October 2021



Attendees and sharing information

Anna Bulwan Brannigan – Dawn Meats

Baruch Macias Camarena - Driscolls

Candida Barbato – representing Driscolls

Clare Clifton - Worldwide Foods

Danny Miles – Morrisons

Denise Slevin – Dawn Meats

Donna Gahan – Dawn Meats

Caroline Downey – MM (apologies)

Johnny Young – JZ Flowers

Louise Herring – HCL

Louise McCafferty – Joseph Robertson

Rebecca Webb – Co-op (apologies)

Sarah Pickin – Sainsburys

Sarah Wadelin - MWW

Meeting Recording:
Available from Louise

Agenda

- 1. Introductions, reminder of our last call and outstanding actions – 8 mins**
- 2. Purchasing practices discussion – 30 minutes**
 - Impact of price rises on workers & implications for commercial teams
 - Review of Sustainable Procurement Pledge
 - Gap analysis of ST Purchasing Practices Toolkit – member input
 - Update on Better Buying Initiative
- 3. Consequence management – 40 minutes**
 - Results of member survey
 - Member discussion/ case studies – policies/ procedures for consequence management

- 4. Remediation policies – 40 minutes**
 - Existing templates and tools for remediation
 - Member discussion/ case studies – policies/ procedures for remediation
 - What are the challenges/ opportunities?
- 5. Next steps for the group – 2 minutes**
- 6. Close and AOB**

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Last meeting – 5th May 2021

WHAT IS IMPACT?

What is impact?
Impact is the measurable economic, social and environmental effect of an activity. It is about effects, not intentions, about the difference an organization makes for society and environment. It can be positive or negative, intended or unintended and direct or indirect.

Stakeholders

Reasons for organisations to start measuring their impact

- Steer business towards sustainability and SDGs
- Better decision making by making trade-offs explicit
- Quantification of externalities
- Communicate value created for and to all stakeholders
- Robust way to measure impact across the value chain
- Build a 'future-proof' organisation and protect license to operate

HUMAN RIGHTS DUE DILIGENCE SCAN

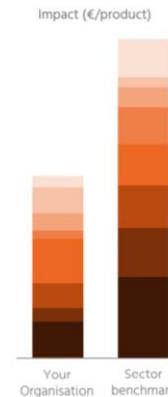
A Human Rights DDS helps organisations to manage their performance and meet market expectations

Human Rights measurement:

- Helps you identify **priority areas and improvement potential**
- Creates **transparency on compliance with human and labour rights**
- Provides you with tools to turn your HR-data into **actionable insights**



- Underearning
- Gender equality
- Freedom of Association
- Health & safety
- Forced labour
- Underpayment
- Harassment
- Child labour



Andrea Rusman – Impact Institute

andrea@impactinstitute.com

2 minutes – 24 minutes in the recording

Contact Louise for copy of recording

Outstanding actions from May – in red

Points for discussion:

- **Retailer's approaches to measuring impact**
- **Member input on social impact projects e.g. diversity and inclusion**
- **Sustainable procurement principles for buyers**
- **Update on Better Buying Initiative**
- **Gap analysis of ST Purchasing Practices Toolkit**
- **How to communicate monetary indicators to buyers**

Other actions

- **Sharing FCDO project learnings – FNET to arrange webinar to share learnings in June**
- **Human rights impact assessments – what is being learnt from them/ how is it influencing ideas about indicators/ types of indicators – FNET to arrange separate meeting to discuss**

Member input on **progress since last meeting**

Measuring impact:

- **Supplier** - Commissioning another impact assessment about business in West Africa – definition of scope is proving very important – need to look at adding value in the country of origin – how lives of people have been affected
- **Supplier** – **Kiel University** did an impact study for them
- **Retailer** – also commissioning a human rights impact assessment with Ergon. **Ergon** are involved in a number – interesting conversations about what value you get for the money you spend – Ergon are looking at other ways of doing this. Conversations around collaboration – also understanding what is out there and building on existing work – coffee in Brazil
- **Supplier** - NGO sector is much further ahead on impact and looking at outcomes (photo diaries about impacts/ participatory social impact assessment) – need to learn from them – what outcomes are people working with?
- **Supplier** - Measuring social impact has a completely different set of metrics to human rights – what is understanding and what does this mean? A lot to learn about human rights impact assessment methodologies
- **Supplier** - Salient risks assessments being worked on. This has led to indicators. Have got to next stage by looking at communities – a lot of salient risks are in countries like Colombia where risks relate to female-headed households and need to support families. Has exposed a desire to work more closely with communities and families. Have taken salient risks, looked at worker voice data, brought out risks which has helped to identify projects
- **Retailer** – in process of scoping out a # of impact assessments in tea and bananas. Also assessing salient human rights risks. To be finished by end yr
ACTION: Responsible Business Team – FCDO – interested in impact assessments – Danny to share contacts

ACTION: Really interesting to hear what other metrics people are using and how they verify that information – how can you verify a good working culture?

Purchasing practices:

- Commercial team have been doing CIPS course – mixed results – very cheap way of doing modern slavery training

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What are the current price rises?

- Freight costs
- Road haulage
- Wage increases
- Fuel costs – gas and petrol
- Raw materials
- Packaging



Economy Here's why your food prices keep going up

Expect to see higher prices in the last quarter of this year in a number of grocery categories. After that, some relief is likely, experts say.

Toilet roll and food packaging production threatened by energy cost surge

The Confederation of Paper Industries has called for a 'temporary wint' companies.

Freight rates drop on popular shipping routes in sign that supply chains normalise soon

19 hours ago (0 Comments)

Posted by: William Barns-Graham

Britons told 'get used to higher food prices' as factories face shutdowns in days

BRITONS have been told to "get used to higher food prices" as factories are said to be "days away" from halting production due to soaring costs.

UK tomato and cucumber farmers shut down production over energy crisis and labour shortages

Consumers must pay more for food or parts of farming industry will move overseas, 'reducing the capacity of UK agriculture to feed the country', says NFU

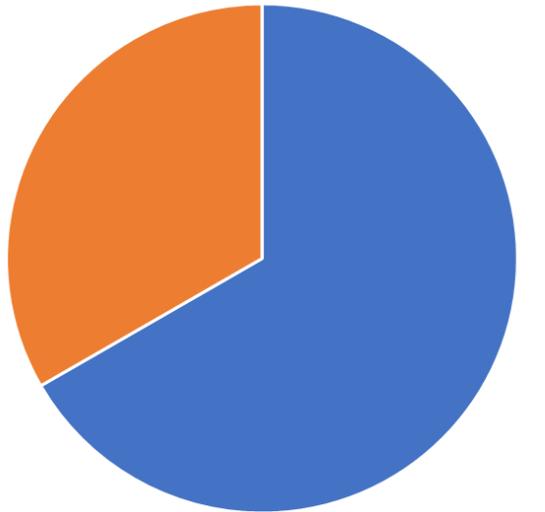
Ben Chapman | 7 hours ago | 30 comments



UK workers set to lose £676 a year as fuel and food prices increase

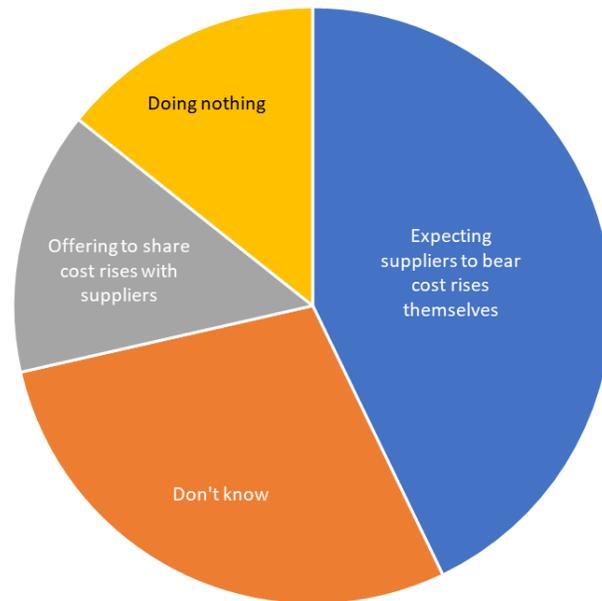
What impact are these price rises having/ how are they being handled? **Results from survey**

How are your buying teams responding to current rises in costs of goods?

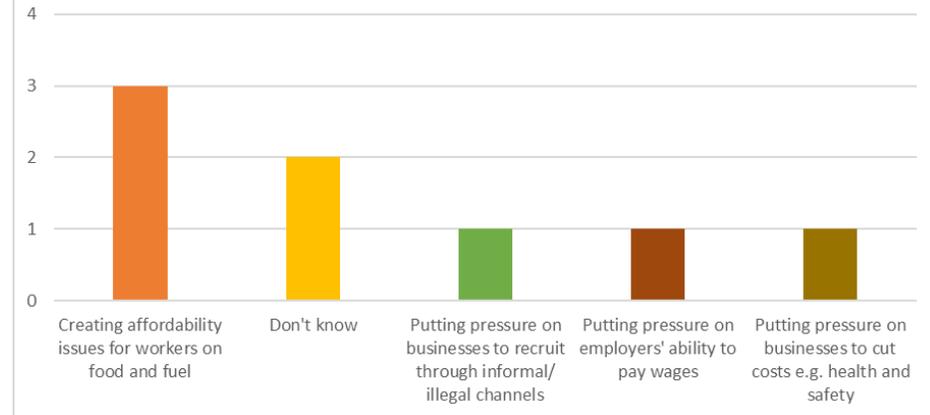


■ Offering to share cost rises with suppliers ■ Don't know

FOR SUPPLIERS: How are your customers responding to the current rises in costs of goods?



What impact are rising costs having on workers in your own operations/ supply chain?



Member comments: what impact is this having/ will this have on workers?

Discussion points:

- **Supplier comment** – are the price increases not being absorbed by consumers? Consumers are seeing prices rising quite sharply – Ranjit Singh article in Food Manufacture stated that prices need to go up <https://www.foodmanufacture.co.uk/Article/2021/10/13/2-Sisters-chicken-king-warns-of-food-inflation-and-less-choice>
- **Retailer comment** – very hard to know if costs are being absorbed in all categories – message generally is that costs are being absorbed as much as possible – however know that can't increase prices by 20% in stores. Not hearing anything from suppliers that commercial teams are creating challenges about price rises
- **Supplier comment** – very different experience retailer by retailer about how rising costs are being managed. Extreme version is to ask suppliers to bear all the costs/ other retailers are taking creative approaches by letting suppliers use shipping line allocations (this also helps when there are challenges with inefficiencies). There is a disconnect between ethical and commercial teams
- **Supplier comment** – where costs are being shared there is also a move to retendering – because shipping costs are unlikely to go down. Will it lead to people moving to sources closer to home as a result of that – this creates human rights impacts if a lot of businesses are exiting from regions still very hard hit by Covid
- **Group comments about survey** - Would be helpful to have the views on purchasing practices from a wider group of suppliers:
 - Would be interested to hear from other FNET members on the supplier side about their experiences – ask the question about percentage impact on margins (can we ask this?) What is the impact of the way that the cost sharing has been done?
 - Is it possible to get some free text entry about particular commodities/ supply chains? Trends can change depending on product line – would be useful to know if suppliers are more protected in certain categories – both from retailers and consumers. There are products where it's easier for a supplier to outsource rather than producing if there are cost squeezes – if suppliers are already struggling financially they may look to import from another country rather than produce
 - Questions require a proper conversation with people in the business who are making decisions at higher levels/ decision maker around price rises is not always buyer
 - Price rises being agreed but limited to a certain issue and timeframe – price rise limited in quantity and time because tied to a specific issue/ very difficult for suppliers – avoids a wider issue of general price increases
- **ACTION:** Issue survey to all members/ Allow for free text/ Aim to improve communication between retailers and suppliers

ST Purchasing Practices Toolkit – gap analysis

What is it?

- 60 page document
- Discusses background to MS, business models, recruitment fees etc
- Outlines 6 steps of UNGPs – Commit, Assess, Act, Remedy, Monitor and Communicate
- **MOVED TO NEXT MEETING: Members to provide feedback on whether this is an area of interest**

Appendices

1. Guidance on third party exploitation
2. Guidance on identifying victims of modern slavery
3. Resource bank for ethical purchasing practices
4. Conducting supplier visits
5. Procurement principles
6. Human rights in supply chain policy
7. Modern slavery in supply chain policy
8. Guidance on Employer Pays Principle
9. Questions for use in the tendering process
9. Template Policy on bribery and corruption
10. Remediation policy
11. Remediation reporting tool
12. Suppliers' self-assessment questionnaire
13. Data collection template
14. Risk assessment tool
15. Opportunity assessment tool
16. Prioritisation and action planning tool
17. Corrective action plan template
18. Supplier evaluation of grievance mechanisms

ST Purchasing Practices Toolkit – member comments:

Discussion points

- **Supplier member** – has developed an 8 page version of this for their small buying team – will share for members of the group
- **Supplier member** – document is excellent, not too long but utopian in its requirements – probably suitable for large multinationals not for most suppliers and possible retailers
- Supplier member – agree that it's too long for messages to hit home
- **Supplier member** - would ST maybe do some webinars, or recorded training based on the toolkit? Maybe a few sessions so it isn't just the modern slavery definitions but also goes into the recommendations for good practices. It might get a wider audience if it's not a resource you have to read.
- **ACTION: Louise to follow up with ST and see if webinars might be possible (training course already exists however this is a full-day training course)**





Review: Sustainable Procurement Pledge (SPP)

What is it?

- A pro-bono community of those committed to embedding sustainability in to their procurement practices - and sharing knowledge and tools of how to do so
- For Procurement Professionals, academics and students

MOVED TO NEXT MEETING: Are members engaged with it? Would you like to be?



Standing up for people and our planet.

I fully understand the criticality of climate change and the need for me to become active. I pledge to do my best to stop exploitation of nature and human beings, environmental pollution, rising inequality and injustice. I will act against modern slavery, human trafficking, child labor, corruption and bribery while upholding business ethics and law-abiding behavior.

Together we will change the world.

I am convinced that all of us involved in Procurement can make a difference by joining forces to accelerate the creation of a just and low-carbon emissions world by contributing to the UN Sustainable Development Goals. I will team up with my Procurement colleagues, my Procurement networks, academics, NGOs and government bodies to exchange on and advance responsible business behavior.



Starting with myself.

I commit myself to lead by example and include sustainability as part of my overall mindful vision and values. I will integrate sustainability aspects into my every-day Procurement decision-making criteria and work with my colleagues and suppliers to drive lasting improvements.

Sharing my knowledge and listening to others.

I will actively share my sustainability knowledge while keeping confidentiality obligations and antitrust rules in mind and always collaborate with all involved stakeholders on our shared mission. I will remain open to the advice and proposals of my peers.



Leaving the right legacy.

I pledge to raise concerns in case of inappropriate business behavior or when I observe unsustainable practices. I fully respect the principles of the UN Global Compact and other international standards and agreements. I am determined to ensure that Procurement leaves the legacy of protecting a sustainable planet for us and future generations.



Better Buying Initiative – any interest?

- The 2020 Better Buying™ Index Report introduces company-level improvements in purchasing practices for 10 companies across two ratings cycles
- Data collected from >870 suppliers
- Questions asked about 7 areas of purchasing practices
- Companies receive privately their own data

- **MOVED TO NEXT MEETING: Are members engaged with it? Would you like to be?**

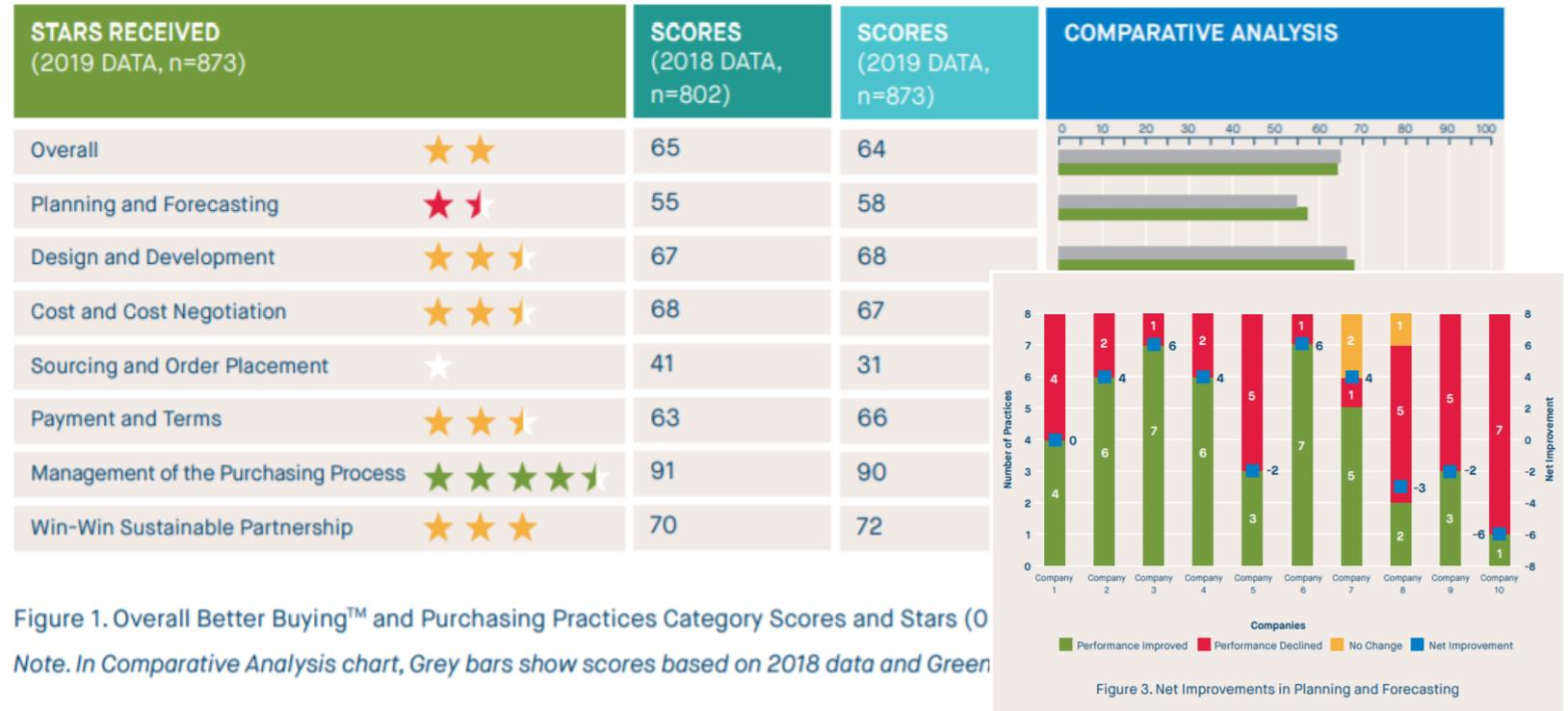


Figure 1. Overall Better Buying™ and Purchasing Practices Category Scores and Stars (0 Note. In Comparative Analysis chart, Grey bars show scores based on 2018 data and Green

<https://betterbuying.org/wp-content/uploads/2020/10/2020-Better-Buying-Index-Report.pdf>

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Consequence management: **member comments**

What is it? **Agreed definition in red**

- How members manage ethical trade issues when they arise in your business and/ or supply chains
- **How you manage serious/ severe ethical trade issues**
- How you communicate and manage the consequences of not responding to ethical trade issues with your suppliers

Discussion points:

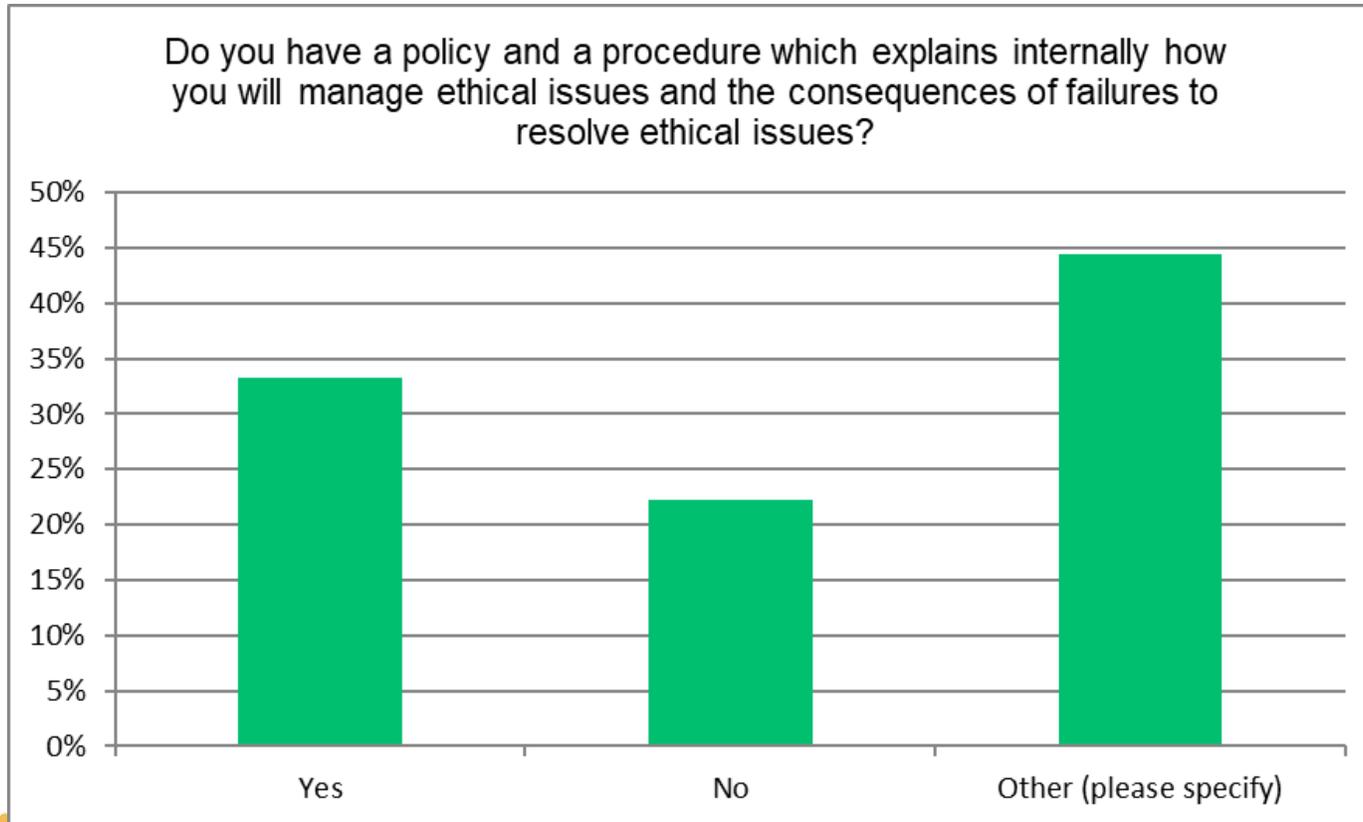
Which definition do you agree with? (see left)

- **Supplier** - Need to define what is a severe issue – is it the people in the supply chain or the retailer/ customer – focus should be on effect on individual people

What are you struggling with in consequence management?

- **Supplier** - Have many different suppliers - if a partner had a problem then everything would be done to support them, smaller trading partner – would be less include to help them – companies don't want to walk away but in certain trading relationships they may do – volume and seasonal – depends what impact
- **Supplier** - Challenges are when supplier has zero engagement on issues – may invest time and money in improving the situation but if supplier is unwilling to invest then have to let them go/ don't have any real internal policies on this/ do you have an ad hoc discussion
- **Retailer** - Leverage and influence is key –had a factory that was very reluctant to tackle child labour – it was 0.01% of supply –managed to get leverage by working with others - FNET has a role where links exist – other collaborations too
- **Retailer** - Have some structured processes in place but tends to apply to non-Food where less time constraints/ not continual shipments into stores – hard to have a fixed process for Food – have to base it on severity with immediate impact on workers

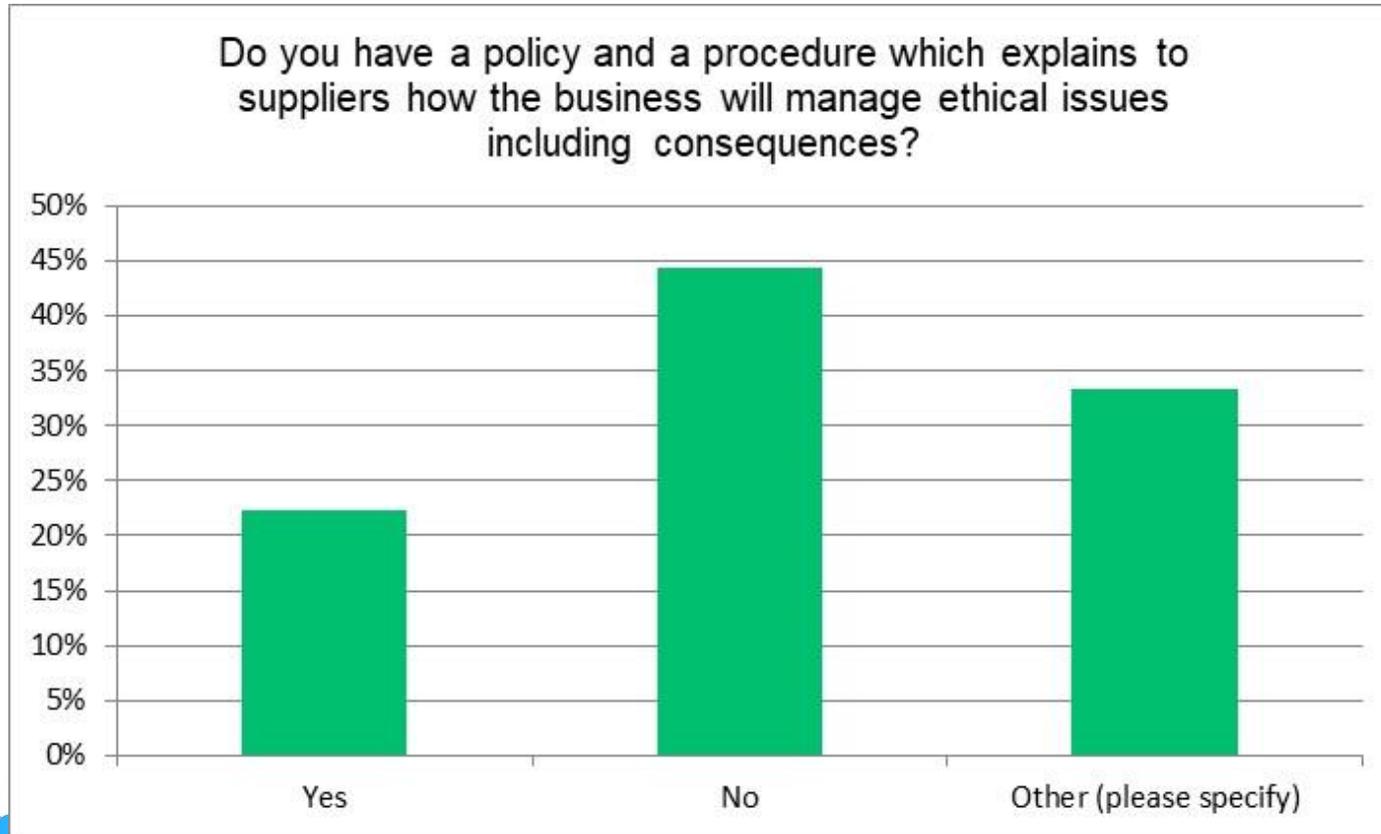
Internal policies and procedures



Other:

- Basic process for all suppliers as part of ethical trading policy and handbook. More detailed process for serious, critical breaches for direct-sourced non food as these have long lead times so action can be taken without significant supply interruptions. Serious issues handled on ad hoc basis. Child labour draft remediation process in development
- In progress
- In progress
- Retailer

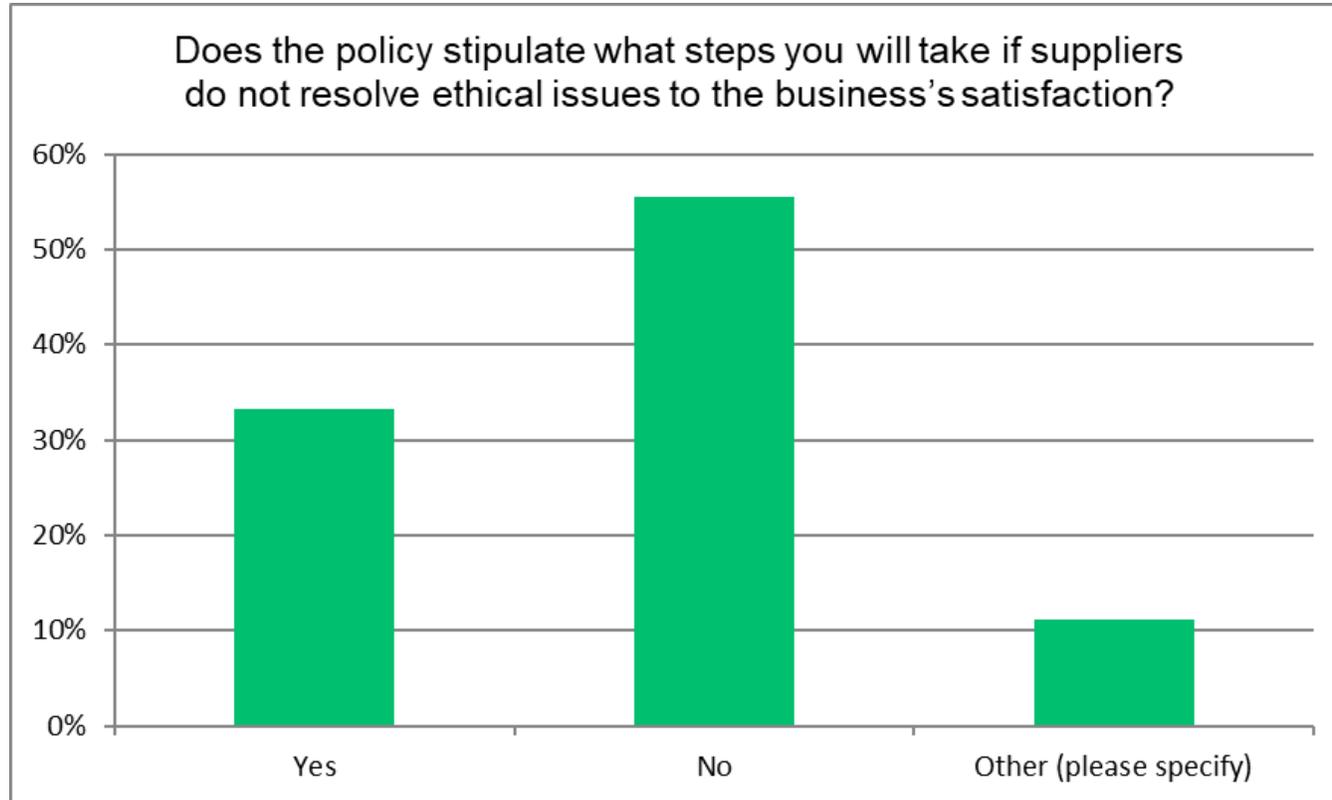
Supplier-facing policies and procedures



Other:

- Within our ethical trade policy we include a statement on working with suppliers to improve but not including consequences
- In Progress
- Code of Conduct. Supplier Guide to Ethical Trade.

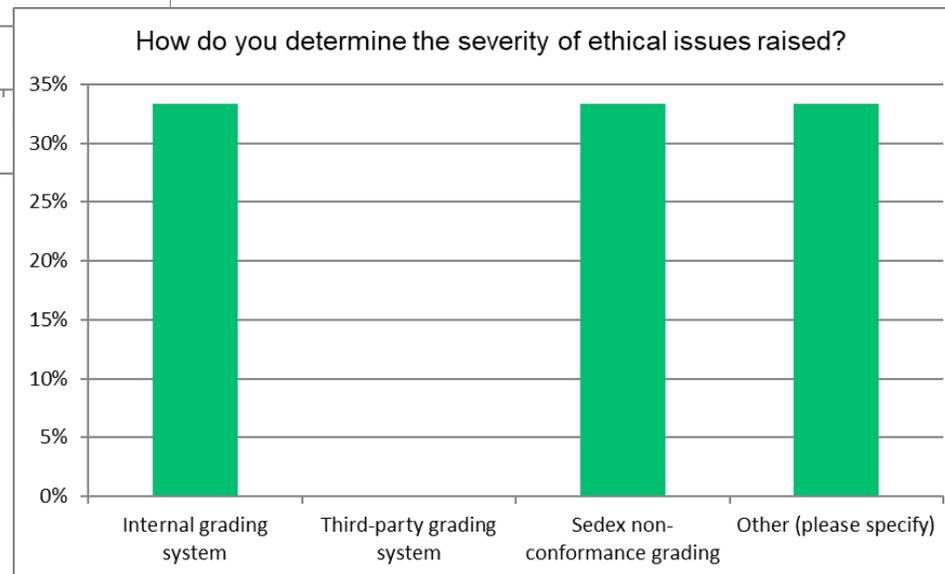
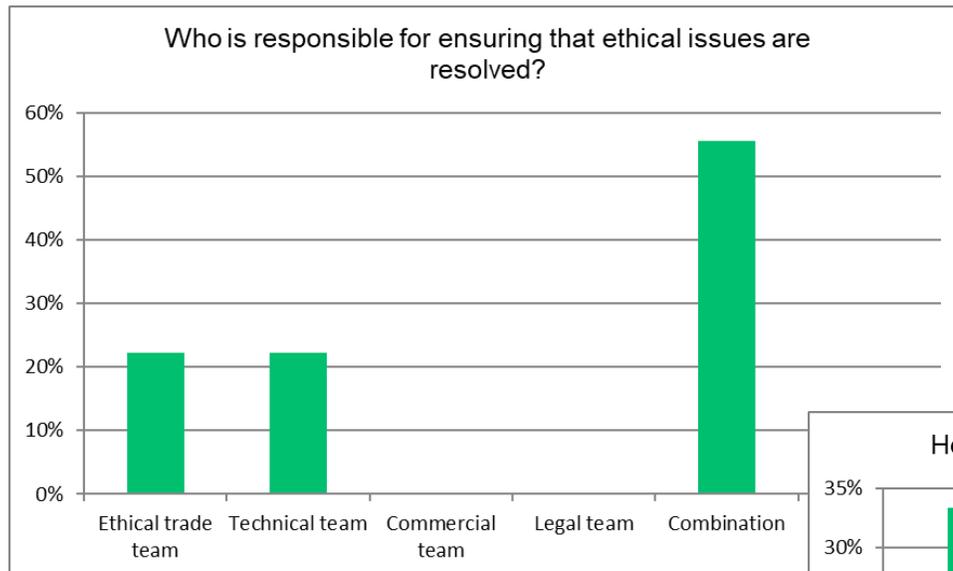
Policy coverage of consequence management



Other:

- We do not have a policy. If there are ethical issues at our suppliers we go in and solve them

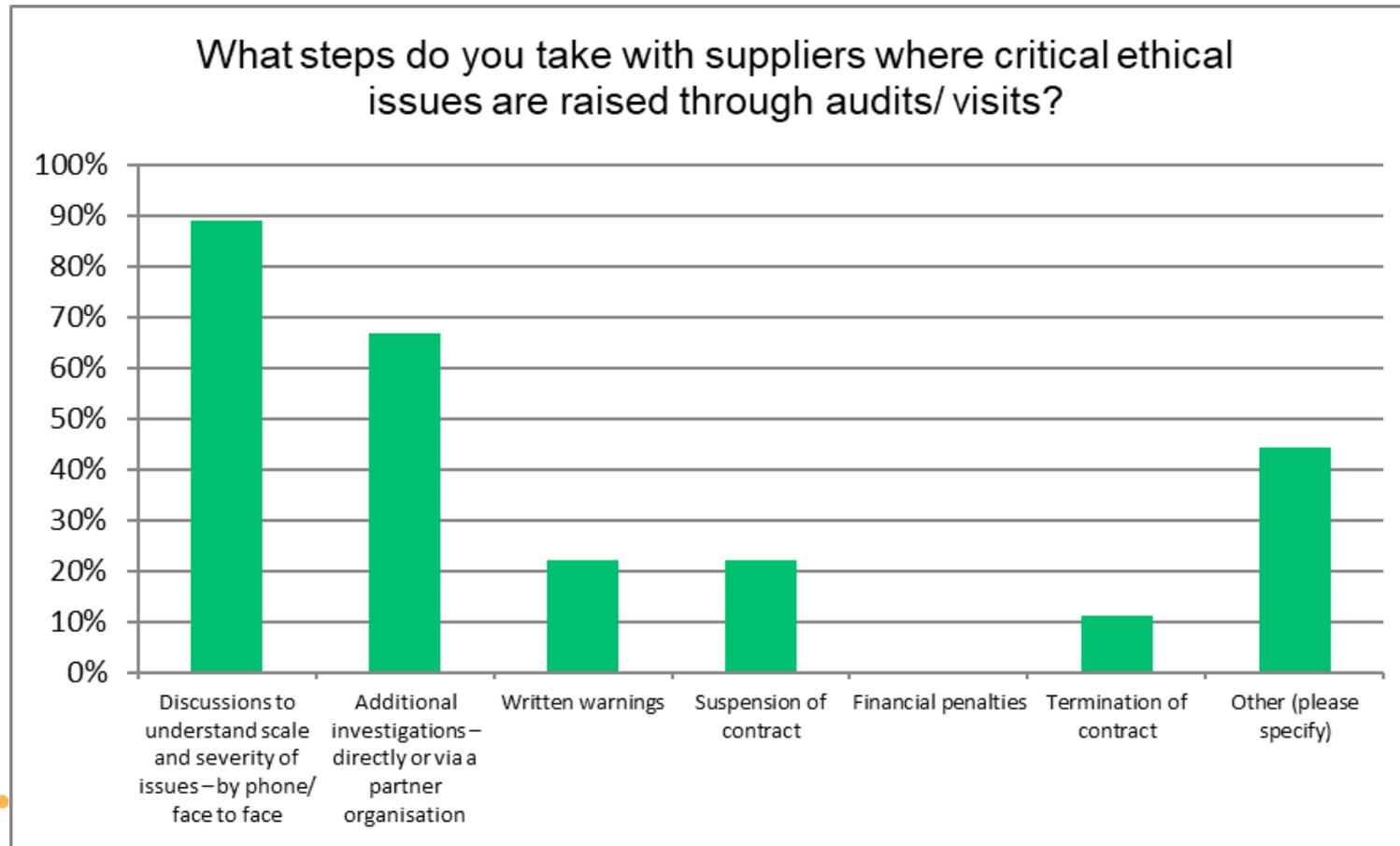
Responsibilities and determining severity



Other:

- Combination of Sedex & Internal Grading. E.g. additional, internal guidance relating to max working hours and the actions required.
- Severity determined by looking at how many people affected and to what degree. Do not use Sedex or third parties
- Sedex, customer determination, third party grading

Steps to resolve critical issues



Other:

- Work with supplier to develop improvement action plan
- We would always start with collaborative discussion and support suppliers to resolve issues. Warnings, suspensions and termination of contract are all potential outcomes if meaningful corrective action is not undertaken.
- Work to resolve issues
- Possible suspension depending on situation

Consequences for suppliers who fail to resolve critical ethical issues...

What consequences are there for suppliers who fail to resolve critical ethical issues e.g. child or forced labour- for example by failing to implement the corrective action plan steps pertaining to them within the time agreed or to provide adequate inform



Other:

- Nothing in policy but Procurement Director would make this decision
- The above are all options but no policy in place to support them in writing
- Case-by-case approach

At what point, would you make a decision to cease supply with a supplier on ethical trade/ human rights grounds?

- Based on the **severity** of the issue and a **continued lack of engagement** on the issue
- **Depends on severity** eg severe injury or death may lead to immediate suspension. Also **if the supplier refuses to correct** the NC over a designated period of time
- Only after they have been offered help to improve and that **help has been ignored**
- We reserve the right to terminate our relationship in accordance with our contractual terms. Our standard Ts & Cs include a clause requiring suppliers to comply with Ethical Trading Code, **wilful non-compliance** would constitute breach of contract.
- **Never**. This would cause more problems for supplier employees.
- An ethical issue in which the **supplier is not engaging** or **retailer requirements override** this
- After the supplier has **consistently failed remediation**
- If there was **no engagement** or **effort** to try to change issues.
- **Case-by-case** approach. Course of action agreed while working with buyer/commercial team. May depend on point in contract.

Who makes the decision to cease supply and how do they make those decisions?

- **Managing Director** based on insight and guidance of the Responsible Sourcing Manager
- **Procurement Director**, subjective decision, not entirely sure what other factors would be included in that decision
- **Commercial Director** supported by internal Human Rights Working Group (includes representation from Ethical Trading, Legal, Technical, Commercial & Supply Chain)
- **It would not happen**
- In collaboration with our **retailer partner** once all of the relating evidence has been collated and assessed
- **Director** level decision
- A quorum of **technical, ethical, legal & buying**
- **Human Rights team** and **procurement**
- Unsure.

Recording and monitoring

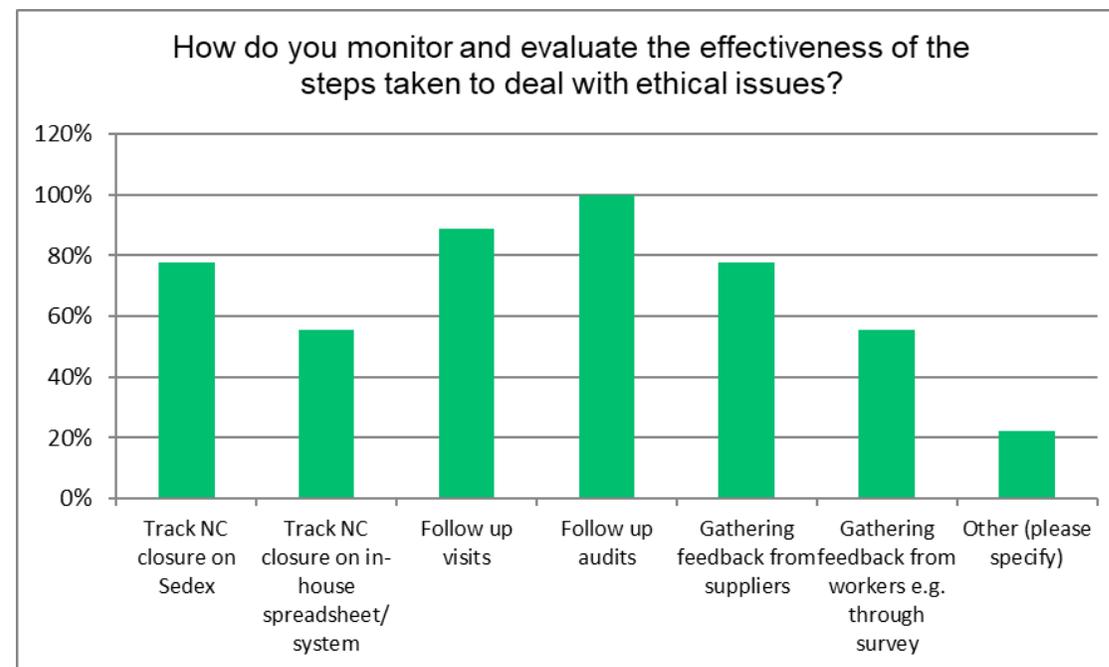
How do you record ethical breaches and how they have been dealt with?

- Internal ethical trade committee
- Derogations allowing longer term to close out issue, follow up with suppliers
- Sedex + ad hoc reporting
- In second party audit documents. The auditor works with the supplier to resolve the issue.
- On an internal ethical issue log
- Ethical tracker
- Through internal records
- Database



Internal issue tracker. Written briefings.

How do you monitor and evaluate the effectiveness of the steps taken to deal with ethical issues?



Other -

- Talk to the people affected
- All apply - depends on the specific nature of the case

What lessons have you learnt from your approach?

- Need a **more aligned approach** across ethical, commercial and procurement when critical issues arise.
- Need a **set procedure** for what happens when key ethical issues are not met. Would help suppliers understand process and formalise it for them and us. Keeping process more informal has worked for now but # of suppliers are increasing
- That **one process does not fit all issues. Sustained partnership approach overtime with buyer involvement** is critical.
- It is **challenging when the supplier does not address root causes** and instead focuses on closing out non-compliances from an audit
- Depends on severity of issue and integrity of reporting. Audits rarely highlight justified Business Critical issues beyond the very occasional extreme working hours issue so most potential critical breaches are reported via whistle-blower channels or via media & NGO reporting. In these cases **hardest step is often simply to establish facts and understand true severity** - which is often made more difficult by issues being historic. What typically works well is when **multiple retailers collaborate on investigations** but this process is facilitated by an impartial third party e.g. BRC, ETI and even better if this is a specialist body e.g. Centre for Child Rights. Often challenging to apply a one size fits all approach.
- **Treat your suppliers well, pay them fairly and on time and they will not be motivated to cut costs and breach ethical requirements** to stay in business. **Work with them to solve ethical issues.** Do not engineer a separation between commercial and ethical aspects of a supply relationship.
- Develop a **Governance procedure** around this topic and **review with suppliers**
- **Engagement and understanding is key** - many retailers still do not engage and will 'write off' a source over working with them
- **Can be difficult to engage with certain suppliers.**



Getting leverage

Discussion points: member comments

Discussion points:

- How often are these issues raised by audits versus whistle-blowers?
- To what extent are policies important as the starting point for managing non-engagement? If important, why do members not currently have them in place? **Ad hoc but technical and quality teams do this all the time/ use the quality/ Food safety template – ACTION: templates**
- **How do you decide on when to take action and when to leave the supplier to resolve? Is criticality of issue the key determinant? If you don't have a system for grading issues how do you decide this?**
 - Continued lack of engagement in the issue/ no real progress being made/ portfolio of supplier
 - Definition is important – worker safety/ consumer safety/ human rights violations/ if the issue is systemic – does supplier have robust systems to tackle issues/ if issue is creating some sort of problem to certification/ brand reputation/
 - Investigation process in order to understand root causes
- How do you get suppliers to focus on root causes?
- Can good purchasing practices remove the need for this process/ policy?
- **Who should own final decision – should be a Committee**
- A guide to what steps you should take in each case – could be a generic guide which each company could have their own tolerance- used to have zero tolerance list – business critical issues – SEDEX – 2018 – **ACTION: Sedex - are they working on this? ACTION: Remediation template – refers to policies Stronger Together ACTION: BRC Protocol on tackling modern slavery ACTION: ISO**
- **How are companies dealing with zero tolerance?** Even with zero tolerance companies are trying to do something to work with supplier but if media pressure grows this may be challenging/
- **ETI – has always discouraged buyers to walk away**
- **Audit data – unannounced audits would be reasonably common practice**

Next steps

Agreed actions:

- **Definition of issues** - share link for Sedex criticality ratings - <http://www.sipascr-peru.com/wp-content/uploads/2018/09/Sedex-Members-Non-Compliance-Guidance-v.2-2018.pdf>
- Members to share templates used in **food quality/ food safety** – can these be applied to human rights? - Members to share with Louise to see if we could use one of these templates to develop a process
- **Sedex** – are they working on this issue and is any guidance planned? – Louise to follow up with Sedex
- **Member guidance** – can we scope out providing guidance for members on what steps you should take in each case/ including investigation to understand root causes/ should it be sanction/ contract termination/ reduction in volume – Louise to explore further with members
- **Documents** which could input into this –
 - BRC Protocol on tackling modern slavery - <https://www.brc.org.uk/media/371745/retailer-protocol-handling-modern-slavery-in-the-uk-supply-chain.pdf>
 - ISO – are there any documents which could feed in – Louise to follow up with Baruch
 - **FNET document – mitigation guidance** - Remediation guidance for members working to close their own non-compliances and/ or working with suppliers to close of ethical non-compliances. Initial guidance to start with top 10 ethical audit issues <https://foodnetworkforethicaltrade.com/mdocs-posts/resolution-of-ethical-audit-issues-guidance-8th-october-2019/>

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Remediation: member comments

What is it?

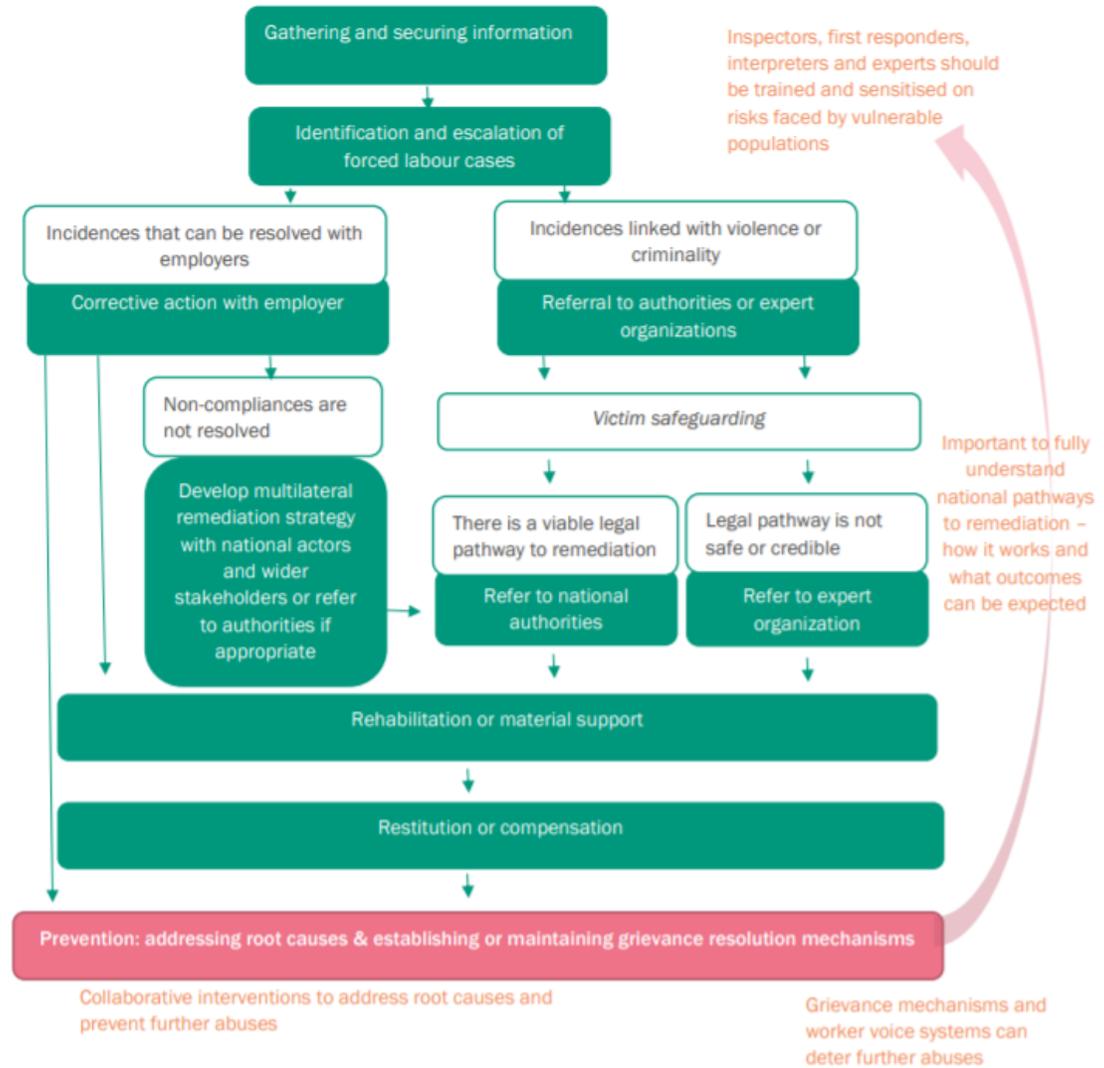
- Establishing a process for responding to violations or reported complaints in your operations/ supply chain
- Implementing remedy to repair harms done to **people – workers, supervisors, management, communities, human rights**
- Does this just cover severe human rights issues? **No but focus is on severe issues at moment**
- How does it overlap with consequence management?

Discussion points:

- Which definition do you agree with? **Consequence management related to critical issues and remediation more broad/ Remediation forms part of consequence management strategy**
- **Two very separate processes but tied together. Need two separate people working on them but constantly in touch with each other**
- **Depending on the situation – you have to apply consequences with suppliers and in some cases you need to apply remedy – if the issue is severe you can implement both**
- **Consequence management is a continuum and remediation loops in there – Plan, Do, Check, Act**
- **What are you struggling with in remediation? Wanting to implement a remediation policy – want to get something in black and white about if you do this, then what happens – have lots of different templates/ like the idea of quality systems and linking in to this**

Remediation principles

The flow chart below outlines how the different components of forced labour remediation could apply in sequence as a response pathway for different types of forced labour situations.



ST Purchasing Practices Toolkit – remediation steps

“Establish a process for responding to complaints or reported violations in the supply chain which includes:

1. **Reporting** incidents or allegations to relevant authorities
2. Conducting an **investigation** to understand the exploitation and the actions required to remedy it
3. Ascertaining if **suppliers** are directly **implicated** in the violation
4. **Protecting** and **supporting at risk individuals** and protecting their identities, as appropriate
5. Capturing **evidence** about the violations under the lead of a competent trusted manager, as appropriate
6. Gathering **information** from victims or intermediaries on what it would take to remedy the wrongs (see remedy resources in Appendices)
7. **Working with local governments and/or competent local organisations** to verify progress
8. Reviewing **efficacy** of remedial steps taken over a suitable time period by gathering anonymous victim feedback
9. Providing **feedback** to suppliers on the remediation process (where appropriate) and steps required to stop violations re-occurring”

[S2G-Toolkit-Tackling-Modern-Slavery-through-Purchasing-Practices-March-2019-1 \(3\).pdf](#)

ST Remediation policy

S2G-Toolkit-Tackling-Modern-Slavery-through-Purchasing-Practices-March-2019-1 (3).pdf



TEMPLATE-REMEDATION-POLICY

N.B.: This is a template, to be modified as required for inclusion within a wider Sustainability or Corporate Responsibility policy. It should be designed with those likely to be impacted by the policy, i.e. managers and workers.

POLICY STATEMENT

[Company] recognises the responsibility that they share with their suppliers to provide remedy to victims of slavery. Successful remediation is not easy to achieve and requires a victim-led, consultative and multi-stakeholder approach. The policy below is drawn from best practice guidance on remediation and builds on the requirements of ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration on Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights. The policy is intended to provide a practical framework for businesses to apply remedy should they encounter victims of slavery in their business or in their supply chains.

Coverage

[To which supply chain(s) does this policy apply?]

Responsibility

[Who has overall responsibility for this policy?]

[Who (which jobholders) has specific responsibilities for various aspects of this policy?]

Basic Principles

These principles apply to all workers regardless of their employment status or length of service. This includes permanent, temporary or casual labour, whether directly or indirectly employed. The response to a situation of forced labour will depend upon the scale of the issue identified.

Remediation Procedures

If modern slavery is found, it is vital to act quickly and to protect the victim.

Step One: Definition of a complaint

[Company] defines a complaint as a report of violation against [Company's] Code of Conduct that has occurred in [Company's] supply chain and has a direct adverse human rights impact. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

Step Two: Designing a remediation procedure

[Company] recognises that it is important to identify and establish a remediation team in order to develop the business's remediation procedure. This should be made up of representatives from the workforce, managers, trade unions (if active in the workplace) and local NGOs with expertise in modern slavery and forced labour where available. If there is an existing government or civil society-backed organisation, process or project providing remedy for victims of modern slavery, these should be identified and involved in the development of the remediation procedure.

Protecting the victim of slavery must be the first priority of the remediation programme. The remediation team must understand the specific needs, circumstances and aspirations of each victim and what it was that pushed them into modern slavery.

[Company] will take the following steps in designing its remediation procedure:

1. Identify a remediation team, including local experts where available
2. Define the roles and responsibilities of each party
3. Decide who will be funding the remediation programme
4. Document what would constitute a grievance and what information the complainant should be able to provide to demonstrate the relevance and seriousness of the complaint
5. Document what channels are available to workers and relevant third parties for raising grievances
6. Ensure that workers and relevant third parties are aware of all of these channels
7. Document how the Company will carry out an investigation, should an incident of modern slavery be identified
8. Identify and document what remedy the business will offer to victims of modern slavery, including restitution (restoring victim to original situation before abuses occurred), compensation (financial or otherwise), rehabilitation (medical, physiological or psychological care) and satisfaction and guarantee of non-repetition
9. Identify and document relevant government and/or civil society-backed support mechanisms that victims of slavery can access
10. Ensure that the procedure acknowledges that victims have the right to pursue other forms of remedial action at any stage beyond internal remedy mechanisms
11. Decide and document how the business will contribute to programmes to assist victims of modern slavery, e.g. through vocational training or other appropriate measures
12. Decide and document how the outcomes of any investigation will be communicated, bearing in mind the need to protect victims

13. Establish a review procedure to ensure that the remediation policy is effective and to review the root causes of any incidents of modern slavery

14. Share the remediation procedure with all workers on site.

Step Three: Dealing with a case of modern slavery

Protecting victims of slavery is the most fundamental principle of any remediation policy. [Company] acknowledges that, once an allegation of modern slavery is made, victims should be:

- Taken to a place of safety, out of view
- Supported by a colleague or trade union representative if possible
- Provided with reassurance and welfare (food, drink, medical assistance)

TEMP REMEDIATION POLICY

business's remediation procedure and the support that is

- Asked what remediation they are looking for, e.g. financial, psychological support
- Given access to relevant government or third-party remediation services

At all stages, [Company] will take steps to protect confidentiality and collect evidence including:

- Ensuring that suitable managers are responsible for running the investigation without links to the allegations
- Recording what the victim says and making full notes of all the circumstances
- Keeping multiple victims separate, speaking to them individually and noting signs of suspects trying to make contact
- Having an independent telephone interpreting service ready to use

The [Company] process for responding to violations will be to:

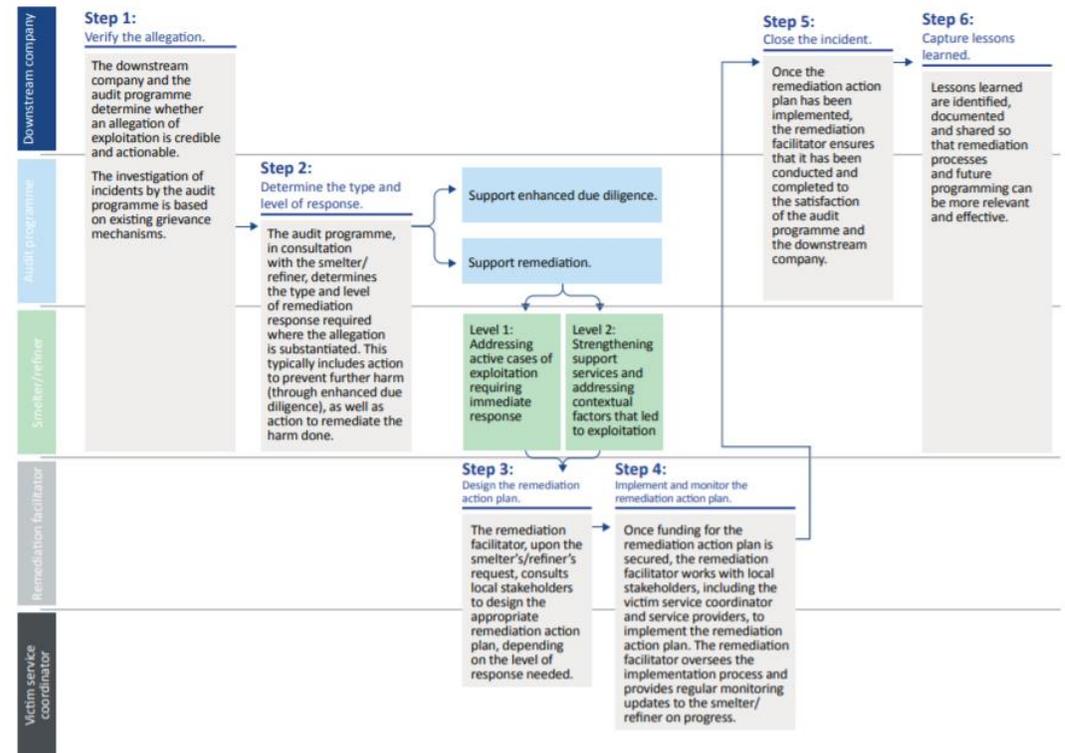
1. Conduct an initial assessment of the allegations to ensure that there is sufficient information to understand the exploitation discovered and remedy it
2. Ascertain if a supplier or labour provider is implicated
3. Report the allegations to relevant authorities
4. Capture evidence about the violations, using an independent third party if necessary
5. Gather information from those affected
6. Take steps to correct the situation for the worker
7. Contribute to programmes and projects to assist the victims of slavery
8. Work with local authorities and competent local organisations to provide assistance

Company/ best practice examples/ research

- [GI Group - modern slavery and forced labour remediation procedure](#)
- [Impactt Child Labour Remediation guidelines \(2008\)](#)
- [Severn Trent – escalation and remediation policy for modern slavery](#)
- [ETI guidance on remedy](#)
- [Ergon remediation guidance for ISEAL](#)
- [IOM Remediation Guidelines for victims of human trafficking \(Section 3 – see diagram right\)](#)



Remediation Guidelines for Victims of Human Trafficking in Mineral Supply Chains



The six-step operational remediation process

Member discussion: member comments

Member comments

- Where are you in developing a remediation policy/ procedure?
- What tools/ templates/ guidance have helped?
- What are the main challenging areas?
- Any next steps together? E.g. small working group for those developing policies

Discussion points:

- 3 members on call have a remediation policy developed/ in progress
- About to launch a new child labour remediation policy and a victim and survivor remediation policy – used Impactt tool (see previous slide) and spoke to [Centre for Child Rights and Business](#) – make sure that roles are defined and who is responsible for funding – be very clear with internal and suppliers about who will do what and when and who will fund what
- Want to cover off any critical non-conformance broadly and then specify out into child labour, forced labour etc.
- **Good example** - <https://pentlandbrands.com/wp-content/uploads/2018/11/Pentland-Brands-Child-Labour-and-Young-Worker-Policy.pdf>
- **ACTION:** Louise to follow up with the Responsible Business Alliance
- **ACTION:** Louise to follow up with Mekong Club – they have a remediation toolkit – any openness to sharing that?
- **ACTION:** Working group – members to let know if of interest to speak to others – Louise to link people up.

Agenda

- 1. Introductions, reminder of our last call and outstanding actions – 5 mins**
- 2. Purchasing practices discussion – 30 minutes**
 - Impact of price rises on workers & implications for commercial teams
 - Review of Sustainable Procurement Pledge
 - Gap analysis of ST Purchasing Practices Toolkit – member input
 - Update on Better Buying Initiative
- 3. Consequence management – 40 minutes**
 - Results of member survey
 - Member discussion/ case studies – policies/ procedures for consequence management

- 4. Remediation policies – 40 minutes**
 - Existing templates and tools for remediation
 - Member discussion/ case studies – policies/ procedures for remediation
 - What are the challenges/ opportunities?
- 5. Next steps for the group – 5 minutes**
- 6. Close and AOB**

SUMMARY: ACTIONS FROM MEETING

Purchasing Practices –

- **ACTION:** Issue survey to all members/ Allow for free text – survey to out by end of October/ to be discussed at all member meeting in November
- **Next meeting** – rollover agenda items on ST Toolkit, Sustainability Procurement Pledge and Better Buying – to Q1 2022

Consequence Management –

Links shared for

- Sedex criticality ratings - <http://www.sipascr-peru.com/wp-content/uploads/2018/09/Sedex-Members-Non-Compliance-Guidance-v.2-2018.pdf>
- BRC Protocol on tackling modern slavery - <https://www.brc.org.uk/media/371745/retailer-protocol-handling-modern-slavery-in-the-uk-supply-chain.pdf>
- ISO – are there any documents which could feed in – Louise to follow up with Baruch
- **FNET document – mitigation guidance** - <https://foodnetworkforethicaltrade.com/mdocs-posts/resolution-of-ethical-audit-issues-guidance-8th-october-2019/>
- Members to share templates used in **food quality/ food safety** – can these be applied to human rights? - Members to share with Louise to see if we could use one of these templates to develop a process – by end of October
- **Sedex** – are they working on this issue and is any guidance planned? – Louise to follow up with Sedex by mid-November
- **Member guidance** – can we scope out providing guidance for members on what steps you should take in each case/ including investigation to understand root causes/ should it be sanction/ contract termination/ reduction in volume – Louise to explore further with members by end of November

Remediation –

- Louise to follow up with the Responsible Business Alliance by end of November
- Louise to follow up with Mekong Club – they have a remediation toolkit – any openness to sharing that? – by end of November
- Working group who are developing remediation policies – members to let know if of interest to speak to others – Louise to link people up - DONE



Next steps – agreed agenda/ goals for 2022

Next meeting to take place in Q1 2022

Measuring impact -

- Retailer's approaches to measuring impact – feed into balanced scorecard
- Supplier input on impact is being measured
- Member input on social impact projects e.g. diversity and inclusion
- How to communicate monetary indicators to buyers

Other actions

- Human rights impact assessments – what is being learnt from them/ how is it influencing ideas about indicators/ types of indicators – FNET to arrange separate meeting to discuss

Goals for 2022?

- **Agreeing recommended human rights KPIs for members**
- Recommendations on **consequence management/ remediation?**
- **Webinar to share experience of implementing human rights impact assessments**
- ~~Recommendations on procurement practices?~~
- UN Declaration of Human Rights and social compliance – how to change language and adopt - Louise to pick up with Stephan