



MODERN SLAVERY
INTELLIGENCE
NETWORK (MSIN)

UK Food Supply Chain Serious Incident Escalation and Management Protocol

Version 2 Issued April 2026. This document is reviewed annually. Any suggested amends forward to admin@foodnetworkforethicaltrade.com as FNET are the responsible party for managing updates. Where information is provided to an organisation using this protocol it is treated as confidential on a strict “need-to-know” basis and inline with legal GDPR principles. Where data is shared it is without identifying details (i.e.. names, location specific details or unique personal circumstances (e.g. medical conditions, immigration status) and only where it is essential for investigation purposes. Where any third parties are involved they are required to respect the security of the whistleblowers personal data and to treat it in line with Data Protection legislation.

Introduction

This Serious Incident Escalation and Management Protocol:

- Outlines the **recommended process for suppliers to report** to their retailer customers potential cases of modern slavery, such as forced labour, human trafficking, debt bondage and other forms of serious worker exploitation in their UK operations and supply chains (serious incidents)
- And **how retailers will handle such cases** received from suppliers in order to drive consistent application of good practice.

Where a serious incident occurs within the supply chain of multiple retailers and/or suppliers, organisations are encouraged to collaborate to reduce duplication of activity and unnecessary burden for all parties; promote good practice and efficiency in the resolution of issues; and provide confidence and assurance to all stakeholders that the matter is being managed in the best interests of those impacted. In cases where a retailer/brand becomes aware of a potential serious incident that has not yet been disclosed by the supplier, additional care should be taken to determine whether it is appropriate to share information with the supplier. This includes consideration of risks to impacted persons, if internal channels are compromised (e.g., management is potentially involved in wrongdoing), or if the whistleblower has expressed no confidence in internal resolution, or if the issue involves serious criminal activity.

Scope¹

The “food supply chain” includes retail, foodservice and hospitality businesses that sell directly to an end consumer (collectively referred to as retailers), brands and goods for resale and not for resale suppliers, farms, factories, logistics and distribution companies, service providers, contractors and labour providers (collectively referred to as suppliers).

We define a serious incident as a severe labour or human rights breach in a direct or indirect supply chain, which presents a serious risk to workers and/or surrounding communities. A non-exhaustive list of serious incidents that may be covered by this protocol is listed below with a link to the reporting channel to the appropriate UK public body. This includes all business-critical issue titles listed on SMETA and the Collaborative Action Required issue titles below.

Issues and where to report them

- Forced labour/child labour/ modern slavery indicators e.g. *appear to be under the control of others, don't have ID documents etc*, see link for more examples – [Modern Slavery Helpline](#)
- Serious or organised crime – [National Crime Agency organised crime](#)
- Money laundering [suspicious activity](#) – [National Crime Agency](#) – *money laundering*
- National Minimum Wage gross and coordinated underpayment of wages – [National Minimum Wage](#)
- Unsustainable labour provider charge rates – [Fair Work Agency](#)

¹ The status of this document is advisory. Document management is coordinated by the Food Network for Ethical Trade (FNET). No competition law issues are foreseen with this Protocol, however it is the responsibility of each individual company to determine its own legal risk. We encourage companies to consult their legal teams, who should have full knowledge of the company's contractual relationships across the value chain and are best placed to determine the applicability of relevant laws to their operations. In navigating human rights due diligence legislation, our advice is to continue to act in line with the UNGPs, the OECD guidelines, and the ETI Base Code.

- Tax evasion or tax avoidance with a serious negative impact on workers – [Fair Work Agency](#)
- Gross and coordinated payment of work-finding fees – [National Minimum Wage](#)
- Gross and coordinated holiday pay theft – [National Minimum Wage](#)
- Coordinated evasion of [pension auto-enrolment](#) obligations – [Pensions regulator](#)
- Gross physical and/or mental mistreatment of workers – [EASS helpline](#)
- Gross and coordinated immigration status crime – [Immigration crime](#)
- Significant risk to the health and safety of workers e.g., *severe building structural damage, failure to appropriately manage fire, chemicals or machinery etc* – [Health and Safety Executive](#)
- An employment agency exploiting the welfare and rights of workers, as listed above – [Pay and work rights complaints](#)
- A labour provider exploiting the welfare and rights of workers, as listed above – [Fair Work Agency](#)
- The following SMETA Collaborative Action Required (CAR) issue titles:
 - Recruitment fees and/or costs have been paid, contrary to law, and there is no plan in place to fully reimburse workers
 - Where child labour has been found it has not been remediated in line with ILO guidance or local legal requirements where applicable (e.g. workers dismissed without remediation)

End-to-end process



Stage 1:
Serious issue identification

Reports/notification of a serious issue can be received via multiple channels;

- **Audits:** Business critical audit finding alerts, Collaborative Action Required (CAR) issue titles
- **Enforcement or Intelligence bodies**
- **Grievance mechanisms**
- **Whistleblowing**
- **Major accident or disaster**
- **Media or investigative journalism**
- **NGO, Trade Union or academic reporting**
- **Site visits:** serious incidents witnessed during routine site visit

Once a report/notification of a potential serious issue is received, a prompt response is vital to protect the reporting person, any impacted individual(s), impacts to other workers who have not raised a grievance but may be in a similar situation should also be considered. As a guideline, aim for a 24 hour timeframe for informing customers particularly for a SMETA business critical or any media allegation. In any event within 72 hours.

The recipient (supplier or retailer) of the initial incident information, should promptly assign a case manager to lead on the following steps. If a number of retailers or suppliers are contacted at once e.g., via the media or an NGO, where possible they should identify a lead company to act as case manager. The assigned case manager should have appropriate safeguarding, human rights, and trauma-informed practice training. Organisations should ensure they follow internal escalation pathways to engage relevant senior stakeholders.

Stage 2:
Address any immediate welfare needs and ensure safe space for the reporting party and any identified impacted individual(s)

The safety and protection of the reporting party and impacted individuals is the priority. This includes safeguarding and ensuring:

- The safety and security of any impacted individual(s), witnesses, or whistle-blowers. If there is an imminent risk to the safety of an associated party, the case manager must notify the relevant authorities immediately. Where one impacted individual(s) has been identified, there may be others, so consider the wider implication of reporting on those who might not have come forward yet. Contact [Modern Slavery Helpline](#) or other (see below and appendix)*, if unsure.
- The wishes (self-determination) and best interests of any impacted individual(s), witnesses, or whistle-blowers are central to action.
- All impacted individuals, witnesses or whistle-blowers are treated with dignity and respect, listened to carefully and taken seriously
- A timely response is provided at each stage
- All impacted individuals, witnesses, or whistle-blowers have access to appropriate, accessible, and quality services, support and information.

Consider the risk to the individual throughout. This first account of a potential serious issue should be based on the disclosures as made by the reporting party. Where appropriate, clarification should be sought quickly to enable the recipient/case manager to effectively risk assess and triage the information shared.

*[Victim support](#), [Rape Crisis](#), [National Domestic Abuse Helpline](#), [Women's Aid](#), [Men's Advice Line](#), [Refuge](#), [Immigration advice: Worker Support Centre](#) or [Joint Council for the Welfare of Immigrants](#).

Stage 3:
Risk assess and notify relevant stakeholders

The case manager should review the information available and carry out an initial risk assessment to identify the severity of the potential issue, considering the risk to workers, local communities and brand reputation.

Recipients of a potential serious issue are encouraged to raise concerns with relevant supply chain stakeholders at the earliest opportunity. The case manager should first assess whether it is appropriate and safe to involve additional stakeholders. The specific details of each case must be kept confidential, and details shared on a strictly 'need to know' basis. This should be explained so each party has clarity on what the expectation is. Place the safety, welfare, and confidentiality of any at-risk persons as the primary and paramount factor, recognising that any impacted individual(s) may be in an extremely vulnerable situation and in a highly traumatised state.

Consider the following:

- Is this issue likely to impact other businesses/supply chain actors?
- Do we have the authority/permission to notify other stakeholders of this incident? E.g., are the authorities and/or reporting party comfortable with the information being shared?
- Can other retailers/suppliers be involved in an investigation? E.g., If there is a risk of potential exploiters at the supplying site/labour provider, the supplying site should not be engaged.
 - If deemed not appropriate to involve others, the case manager should still consider engaging an independent third party to provide guidance.
- If involving the ETI, can they make NGO and trade union members aware?
- Does the retailer/supplier have the level of objectivity required to respond to the potential issue? E.g., if this is happening in your own operations, would there be a benefit to an independent individual/organisation objectively viewing the situation

The case manager will determine how they wish to communicate the matter to their retailer customers/suppliers/other supply chain partners. A supplier of multiple crop types will need to consider alerting other marketing desks, as may be appropriate.

Stage 3:
Risk assess
and notify
relevant
stakeholders

This may vary depending on the facts of the case, but the recommended approach is a single email to all parties to ensure consistency of message and timing.

This email should include a summary of facts with the timeline of events to the best of the case manager's knowledge, in as much detail as may be appropriately released. Information provided in confidence will be treated as such by all parties and will not be shared beyond the relevant retailers, suppliers, other supply chain partners, appointed facilitating third-party, specialist, or auditor, without the explicit approval of the original recipient. At every stage, information must be recorded responsibly and accurately, ensuring clear timelines, notes of decisions made, and a rationale for actions taken. Personal identifiers, detailed personal circumstances, or sensitive information must not be included unless essential for safeguarding. Where possible, anonymised summaries should be used. Comprehensive record-keeping is imperative to support businesses in keeping clear records and to support better outcomes for people impacted.

Retailers are all well-equipped to keep cases confidential and often have direct links. Alternatively, case managers can share the serious incident information with one of the following who may be able to help support facilitation of multi-stakeholder engagement:

- For serious issues in global (non UK) supply chains and/or issues involving freedom of association **Ethical Trading Initiative (ETI)**: collectiveaction@eti.org.uk
- For serious incidents in FNET members UK or overseas production sites **Food Network for Ethical Trade (FNET)**: technicallead@foodnetworkforethicaltrade.com
- For serious incidents that concern the recruitment and employment of UK seasonal horticultural or poultry workers, **UK Seasonal Worker Scheme Taskforce**: SWTaskforce@stronger2gether.org.
- For serious incidents involving labour providers **Association of Labour Providers** <https://www.labourproviders.org.uk/>
- For reports of exploitation, email **Unseen**: business@unseenuk.org

Retailer commitments:

- Following receipt of a notification of a serious incident, relevant retailers will aim to collaborate in their response rather than pursuing individually and duplicating activity. 'Relevant' retailers, as referred, are those retailers supplied directly or through other levels of the supply chain by the particular supplier.
- Retailers are all well equipped to keep cases confidential and often have direct links into enforcement bodies and other stakeholders which can help ensure better outcomes, especially when consulted at an early stage
- Where an enforcement body has already been notified, retailers accept that for suppliers to better protect the safety of individuals and not prejudice inquiries and potential prosecutions, their supply chain will maintain confidentiality over all information relating to the incident until advised they can share this information by the involved authorities.
- Retailers will coordinate internally to ensure consistency of message and action between all departments such as ethical trade, procurement/buying, legal, PR etc.

Media: In certain circumstances, associated supply chain parties may be asked/required to provide a response to media. This should be determined on a case-by-case basis. The BRC will coordinate any media release on behalf of and in agreement with, associated retailers, collaborating with enforcement bodies, suppliers, retailers, other supply chain parties and appointed third parties as may be relevant. Where a supplier leads on media communications, retailers will offer their support.

Stage 3:
Continued

BRC will appropriately reflect the positive contribution made by suppliers who have identified issues within their business and/or supply chains, and have engaged appropriately with enforcement authorities. Collaborating organisations may also provide separate responses to the media if contacted directly.

The case manager must ensure a fair and transparent investigation is conducted, taking an impacted individual(s) centred-approach to always make sure that the individuals feel supported, protected and that they have trust in the process.

To inform what type of investigation, consider the following:

- Is there sufficient information available to investigate?
- Is there an ongoing investigation by an authority body? No actions should be taken without explicit permission from the authorities first/an understanding of the status of the case and the involvement of the individuals impacted, seek confirmation if unclear.
- Do we have the expertise internally to investigate this potential issue?
- Is a collaborative investigation with other retailers/suppliers appropriate?
- Is the retailer/supplier sufficiently experienced/competent to handle the investigation?
- Whose input or account of the situation is needed?
- Are the available grievance mechanisms effective?
- Is there a recognised trade union on site that could support resolution?
- Has a similar issue been raised at this retailer/supplier/supply chain actor before?
- Has there been a recent visit, audit or third-party social audit carried out? Were there any concerns raised?

Stage 4:
Investigate
the issue

Decision: The case is not suitable for a collaborative response

Follow the organisation's own internal investigation protocol.

The specific details of each case must be kept secure with very limited numbers of trained personnel knowing the full details of any one case. Consider hiring an external expert. See *Stronger Together UK Businesses Toolkit*, e.g., *incident management template*.

Decision: Collaborative investigation required

1. Consider appointing a third-party facilitator to coordinate the investigation. A conversation with a customer or ETI/FNET/ SWS taskforce/ALP may help with evaluating if a third party is required, or identifying which organisation may be best placed to act as the third party facilitator and support with drafting an outline plan for investigation. Third-party facilitators can play a critical role in coordinating collaborative investigations. To protect them from legal, reputational, and operational risks, the following safeguards should be in place:

a) Clear Terms of Reference

- Define the facilitator's scope, responsibilities, and limitations.
- Clarify that the facilitator is *'not liable for commercial decisions or legal outcomes'*.
- Include a clause stating they are *'not empowered to make binding decisions'* for supply chain parties

b) Signed Collaboration Agreement

- All participating companies should sign an agreement that:
- Confirms shared responsibility.
- Outlines funding arrangements. Costs should be shared appropriate to means.
- Clarifies data sharing protocols and confidentiality
- States that the facilitator acts in a neutral, coordinating role

c) Data Protection Compliance

- Ensure GDPR compliance. Whistleblower identities should be protected, and access to reports should be restricted. Individuals involved should be informed about how their data is processed, unless it jeopardises an investigation.

Stage 4:
Continued

- Use secure channels for communication.
- Limit access to sensitive data. Strong technical and organisational safeguards must be in place to prevent unauthorised access or leaks.
- Apply data minimisation and retention policies. Only collect and process necessary personal data related to the report. Reports should not be stored longer than necessary, especially if no investigation follows.

d) Conflict of Interest Declaration

- Require all parties (including the facilitator) to declare any conflicts of interest.
- Rotate facilitators or investigators if impartiality is compromised.

e) Insurance and Legal Review

- Facilitators should consider ****professional indemnity insurance****.
- Have legal counsel review contracts and protocols to ensure protection.

Agreement on how the third-party facilitator will be funded should be agreed upon during, or immediately after, the first collaborative call.

2. Agree a plan for the investigation

The facilitator (internal or a third party) will coordinate:

- An initial collaborative call with all relevant supply chain parties to present the known facts and identify next steps. The case manager from the original recipient party will attend the call to present the outcomes of initial notification and data gathering. In some cases, additional retailer-only/supplier-only/individual party calls may be required, depending on the nature of the potential serious issue.
- Confirmation of the 'investigation lead'. This should be the original recipient of the report/notification, unless a clear conflict of interest is identified. Where this occurs, all engaged stakeholders will be consulted to vote for an alternative 'lead'.
- Clarify whether companies involved have the necessary contractual rights to send in third-party auditors unannounced.
- Actions and information required from relevant supply chain parties, including timeframes
- Organise, including confirmation of funding and appointment of a specialist/auditor, or an independent assessment (such assessments should not occur whilst a criminal investigation phase is active and only after the enforcement authority has advised that it is appropriate to do so)
- Clarify who signs contracts with third-party investigators. If the third party facilitator is contracting and paying the investigator. Funding for the investigation will be needed to be collected from companies involved ahead of the investigation commencing.
- Agreement on following actions, including media engagement where necessary
- Meeting minutes, actions and progress tracker
- Post incident review to highlight gaps in process, root cause and corrective action required by relevant parties

3. Conduct investigation:

An investigation will be carried out to determine:

- The evidence that the reported claims are substantiated or unsubstantiated.
- Identification of the root cause of the issue
- Re-assessment of the severity/risk: scale, likelihood, brand reputation risk

Note: An appointed Third Party is not empowered to make binding decisions that create commercial impacts for supply chain parties.

Once the investigation is complete

The facilitator will coordinate with the 'investigation lead':

- Receipt and dissemination of investigation reports

Stage 4: Continued

- Provision of support, as may be deemed necessary or helpful to relevant supply chain parties
- Discussion of remediation

Evaluation and review of lessons learned to refine and develop good practice and to establish similar processes in other country supply chains.

The 'investigation lead'/case manager is responsible for formalising a corrective action plan which includes:

- **A remediation plan to support any impacted individual(s)**; This can include working with local authorities or competent local organisations to provide assistance/support. The ETI [Access to Remedy](#) or FNET's Remediation Guidance (member only) provides helpful supporting guidance.
- **Preventative measures** to address the root cause of the issue and prevent reoccurrence.
- **Clear timescales** to close corrective actions.

Remediation is the resolution of issues. According to the [United Nations Guiding Principle 22](#), remediation can come in many forms, including apologies, restitution, rehabilitation, restoration, financial or non-financial compensation, punitive sanctions, injunctions, and guarantees of non-repetition. Depending on how a retailer/supplier/other supply chain actor is linked to the human rights violations, will determine the role in remedying issues and ensuring that future violations are prevented.

Stage 5: Instigate the corrective action plan

The 'investigation lead'/case manager will regularly review progress made against the corrective action plan. All stakeholders will agree on how the corrective action plan will be closed off. This will be determined on a case-by-case basis. For example, this might be a follow-up on site assessment by the same third-party used for the investigation, to ensure all actions have been effectively implemented. The 'investigation lead'/case manager will escalate to relevant stakeholders if no agreement /remediation has been reached within the agreed timelines or a reasonable period.

Retailers commit that there will be no standard policy to immediately delist or suspend trade with that supplier because of that specific reason where the supplier has:

- alerted their customers;
- is cooperating with authorities;
- is actively implementing corrective actions
- and is not found to be controlling, or complicit in, the offence.

If a supplier has not, or is not cooperating with authorities, is failing to implement required corrective actions, or is found to be controlling, or complicit in, the offence, retailers may then individually decide to take appropriate commercial actions, including suspending trade or delisting the supplier. All commercial decisions made by affected retailers must be based on their own due diligence and review of available evidence.

Any reduction in orders or delisting must be done in a responsible manner and in accordance with [Groceries Supply Code of Practice](#).

Any feedback or complaint by a supplier on the application of this protocol may be made to the lead retailer, appointed facilitating third party or to the BRC or Food Network for Ethical Trade (FNET), as the supplier deems appropriate. A formal response will be provided where one is requested. The aim is to revise this protocol based on further feedback, as we learn together how to best collaborate on the escalation and management of these serious issues.

Appendix 1: Guidance to help inform which collaborative organisation could help support facilitate collaborative investigation

Which organisation is right to approach?

Is there alignment with strategy and priorities?

CRITERIA

- Relevance to the organisation
- Relevance for members' salient risks and supply chains, priorities and expertise.
- Indicative of broader structural issues in the sector e.g., higher prevalence of child labour or recruitment fees.
- Affected workers are in highly vulnerable situation(s).

Approaching organisation:

Is there an opportunity to develop collective action?

CRITERIA

- Relevance for a sufficient number of members (tbc) and/or strategic work (case studies, experience)
- Involvement of external stakeholders (e.g., NGOs, trade unions, media, legal)
- Clarity of action needed to be taken by members.

Approaching organisation:

Are they best placed to do the work?

CRITERIA

- Relevance of existing internal expertise, capacity (budget, resource) & strategic work
- Will the work complement (not duplicate) that of other organisations.
- Ability to collaborate with relevant expert and in-country stakeholders.
- Leverage within membership to enable progress.

WHO?

- **British Retail Consortium (BRC):** retailer-only issues, media & government related
- **Ethical Trading Initiative (ETI):** For serious issues in global (non UK) supply chains and/or issues involving freedom of association
- **Food Network for Ethical Trade (FNET):** For serious incidents in FNET members UK or overseas production sites
- **UK Seasonal Worker Scheme Taskforce:** For serious incidents that concern the recruitment and employment of UK seasonal horticultural or poultry workers,
- **Association of Labour Providers:** For serious incidents involving labour providers
- **Unseen UK:** for reports of exploitation



**MODERN SLAVERY
INTELLIGENCE
NETWORK (MSIN)**

Appendix 2: Example of how the RACI might work where the issue is identified via the supplier. We recognise that issues may arise direct to retailer, via a third party, Just Good Work, SWS grievance mechanism or via a supplier and that responsibilities will differ depending on the route.

Stage	Supplier	Retailer	Third Party Organisations
Stage 1: Serious issue identification	<ul style="list-style-type: none"> On receiving a report/ notification of a potential serious issue assign a <u>case manager</u> to lead the investigation 		
Stage 2: Address any immediate welfare needs and ensure safe space for any impacted individual(s)	<ul style="list-style-type: none"> The safety and protection of the reporting party and impacted individuals is the immediate priority. If there is an imminent risk to the safety of an associated party, the case manager must notify the relevant authorities immediately. A safe space may include: conducting conversations in private rooms; using independent interpreters; ensuring individuals are not approached in view of potential exploiters; and creating an environment that reduces fear or coercion. 	Retailers accept that notification of a case may not be immediate, depending on the circumstances of the investigation.	
Stage 3: Risk assess and notify relevant stakeholders	<ul style="list-style-type: none"> The case manager should review the information available and carry out an initial risk assessment to identify the severity of the potential issue, considering the risk to workers, local communities and brand reputation. Where a red flag has been raised of a potential internal modern slavery incident, suppliers should complete an investigation and only contact a customer once they have concluded the issue is serious and have reported to the authorities, as sometimes flags have innocent root causes. Case managers should consider individuals' support needs from the outset, such as accommodation, medical support, legal advice, and immediate safety planning. Signposting to the MSEH should be considered where modern slavery indicators are present. At this stage, it is possible that the identity of affected persons is unknown. Where this is the case, safety checks will be limited to information available until further details emerge Organisations should endeavour to be transparent with the impacted individuals and make them aware about how the case is being handled and update them of all relevant timelines. Organisations should reflect not only on whether they have internal expertise, but whether they are best placed to directly 	<ul style="list-style-type: none"> If the supplier may be implicated or engagement could create risk to affected individuals, retailers should consider independent investigation before contacting the supplier. Where an enforcement body has already been notified, retailers accept that for suppliers to better protect the safety of individuals and not prejudice inquiries and potential prosecutions, their supply chain will maintain confidentiality over all information relating to the incident until advised they can share this information by the involved authorities. Retailers will coordinate internally to ensure consistency of message and action between all departments, such as ethical 	<p>The BRC, on behalf of retailers, will coordinate a response appropriately reflecting the positive contribution made by suppliers who have identified issues within their business and/or supply chains, and have engaged appropriately with enforcement authorities.</p> <p>The case manager could choose to share the serious incident information with one of the following who could support facilitation of multi-stakeholder engagement:</p> <ul style="list-style-type: none"> For serious issues in global (non-UK) supply chains and/or issues involving freedom of association, Ethical Trading Initiative (ETI): collectiveaction@eti.org.uk For serious incidents in members' UK or overseas production sites, Food Network for Ethical Trade (FNET): technicallead@foodnetworkforethicaltrade.com For serious incidents that concern the recruitment and employment of UK seasonal



**MODERN SLAVERY
INTELLIGENCE
NETWORK (MSIN)**

Stage	Supplier	Retailer	Third Party Organisations		
	<p>engage impacted persons. Independent NGOs or specialists may be more appropriate where trust needs to be established. This choice should be made in collaboration with the impacted individuals.</p> <ul style="list-style-type: none"> • The case manager should notify relevant retailer customers at the earliest appropriate opportunity. For media related inquiry/allegation or any supply chain issue, suppliers should inform the customer prior to conducting an investigation. As a guideline aim for a 24 hour timeframe for informing customers particularly for a SMETA business-critical or any media allegation. In any event within 72 hours. • The format may vary depending on the facts of the case, but the recommended approach is a single email to all clients to ensure consistency of message and timing. • The email should include a summary of facts with the timeline of events. • If the issue has media involved the case manager may want to notify additional third parties who can support with media enquires such as relevant trade association that the supplier is a member of. 	<p>trade, procurement/buying, legal, PR etc.</p> <ul style="list-style-type: none"> • Retailers can offer support to supplier in engaging stakeholders which can help ensure better outcomes, especially when consulted at an early stage 	<p><i>horticultural or poultry workers</i>, UK Seasonal Worker Scheme Taskforce: SWStaskforce@stronger2gether.org.</p> <ul style="list-style-type: none"> • For serious incidents involving labour providers Association of Labour Providers https://www.labourproviders.org.uk/ • For reports of exploitation, email: business@unseenuk.org 		
<p>Stage 4: Investigate the issue</p>	<p>Case manager to determine type of investigation; 1)Not suitable for collaborative response or 2) Collaborative investigation required.</p> <table border="1" data-bbox="264 975 1090 1465"> <tr> <td data-bbox="264 975 674 1465"> <p>If 1) Not suitable for collaborative response, use an incident management approach such as Stronger Together UK Businesses Toolkit.</p> <p>During the investigation, provide regular updates on progress to relevant stakeholders (labour provider, retailer, marketing agencies and the Fair Work Agency). Such calls should include:</p> </td> <td data-bbox="674 975 1090 1465"> <p>If 2) Collaborative investigation required.</p> <p>Consider appointing a separate organisation to act as a third-party facilitator to co-ordinate investigation. A customer or conversation with ETI/FNET/Sea Alliance/SWS taskforce/Unseen (MSEH) may help with identifying which organisation may be best placed to act as the third-party facilitator and help draft an outline plan for investigation. Agreement on how the third-party facilitator will be</p> </td> </tr> </table>	<p>If 1) Not suitable for collaborative response, use an incident management approach such as Stronger Together UK Businesses Toolkit.</p> <p>During the investigation, provide regular updates on progress to relevant stakeholders (labour provider, retailer, marketing agencies and the Fair Work Agency). Such calls should include:</p>	<p>If 2) Collaborative investigation required.</p> <p>Consider appointing a separate organisation to act as a third-party facilitator to co-ordinate investigation. A customer or conversation with ETI/FNET/Sea Alliance/SWS taskforce/Unseen (MSEH) may help with identifying which organisation may be best placed to act as the third-party facilitator and help draft an outline plan for investigation. Agreement on how the third-party facilitator will be</p>	<ul style="list-style-type: none"> • Following receipt of a notification of a serious incident, relevantⁱ retailers will aim to collaborate in their response rather than pursuing individually and duplicating activity. 	<p>If 2) Collaborative investigation required.</p> <p>1. Agree a plan for the investigation. The third-party facilitator will coordinate with the case manager:</p> <ul style="list-style-type: none"> • An initial collaborative call with all relevant supply chain parties to present the known facts and identify next steps. • Actions and information required from relevant supply chain parties, including timeframes • Organise, including confirmation of funding and appointment of a specialist/auditor, or an independent assessment (such assessments should not occur whilst a
<p>If 1) Not suitable for collaborative response, use an incident management approach such as Stronger Together UK Businesses Toolkit.</p> <p>During the investigation, provide regular updates on progress to relevant stakeholders (labour provider, retailer, marketing agencies and the Fair Work Agency). Such calls should include:</p>	<p>If 2) Collaborative investigation required.</p> <p>Consider appointing a separate organisation to act as a third-party facilitator to co-ordinate investigation. A customer or conversation with ETI/FNET/Sea Alliance/SWS taskforce/Unseen (MSEH) may help with identifying which organisation may be best placed to act as the third-party facilitator and help draft an outline plan for investigation. Agreement on how the third-party facilitator will be</p>				



**MODERN SLAVERY
INTELLIGENCE
NETWORK (MSIN)**

Stage	Supplier	Retailer	Third Party Organisations
	<ul style="list-style-type: none"> • Recount of facts and timeline • Supporting facts from Fair Work Agency • Questions and discussion • Agreement on next actions, including media engagement where necessary • On closure of call, email from supplier to confirm above and to contain initial Action Plan or post incident review which highlights gaps in process, root cause and corrective action required by the supplier, labour provider etc. 		<p>criminal investigation phase is active and only after the enforcement authority has advised that it is appropriate to do so)</p> <ul style="list-style-type: none"> • Agreement on next step actions, including media engagement where necessary • Meeting minutes, actions and progress tracker <p>2. Conduct investigation: An investigation will be carried out to determine:</p> <ul style="list-style-type: none"> • Evidence that the reported claims are substantiated or unsubstantiated • Identification of the root cause of the issue • Re-assessment of the severity/risk: scale, likelihood, brand reputation risk <p>Note: An appointed Third Party is not empowered to make binding decisions that create commercial impacts for supply chain parties.</p>
<p>Stage 5: Instigate the corrective action plan</p>	<p>The case manager is responsible for formalising a corrective action plan, which includes:</p> <ul style="list-style-type: none"> • A remediation plan to support any impacted individual(s); This can include working with local authorities or competent local organisations to provide assistance/support. The ETI Access to Remedy or FNET's Remediation Guidance (member only) provides helpful supporting guidance. • Preventative measures to address the root cause of the issue and prevent recurrence. • Clear timescales to close corrective actions • Seeking agreement with stakeholders on how the corrective plan will be closed off. <p>Individuals impacted should be involved in the design of remediation plans, with their wishes and consent guiding decisions. Clear, accessible information on potential remedies should be provided. Trauma-informed practice should underpin remediation, recognising that trauma may affect memory, communication, trust,</p>	<ul style="list-style-type: none"> • Retailers commit that there will be no standard policy to immediately delist or suspend trade with that supplier because of that specific reason where the supplier has: <ul style="list-style-type: none"> ○ alerted their customers; ○ is cooperating with authorities; ○ is actively implementing corrective actions ○ and is not found to be controlling, or complicit in, the offence. • If a supplier has not, or is not cooperating with authorities, is failing to implement required corrective actions, or is found to be controlling, or complicit in, the offence, retailers may then 	<p>If 2) Collaborative investigation required. Once the investigation is complete</p> <p>The third-party facilitator will coordinate with the case manager:</p> <ul style="list-style-type: none"> • Receipt and dissemination of investigation reports • Provision of support, as may be deemed necessary or helpful to relevant supply chain parties • Discussion of remediation • Evaluation and lessons learned to refine and develop good practice and to establish similar processes in other countries' supply chains



MODERN SLAVERY INTELLIGENCE NETWORK (MSIN)

Stage	Supplier	Retailer	Third Party Organisations
	<p>and emotional responses. Staff managing remediation should have safeguarding training</p> <p>The case manager will regularly review progress made against the corrective action plan.</p> <p>The case manager will escalate to relevant stakeholders if no agreement/remediation has been reached within the agreed timelines or a reasonable period.</p>	<p>individually decide to take appropriate commercial actions, including suspending trade, disengaging from the supply relations in a responsible manner consistent with UNGPs</p> <ul style="list-style-type: none"> To support continuous improvement, all cases will be anonymised and linked to a structured data tracker that records severity, number of workers affected, remedy applied, and survivor satisfaction 	

Appendix 3: Directory of Support Services for Impacted Individuals (e.g. MSEH, local NGOs, legal aid providers) abuse.

Consider also best-practice in relation to person-centred care, prioritising trust building and adopting a trauma-informed approach. [See more from the South West Anti-Slavery Partnership.](#)

General support: Victim Support - <https://www.victimsupport.org.uk/>

Sexual violence:

- Rape Crisis - <https://rapecrisis.org.uk/>
- Revenge Porn HL - <https://revengepornhelpline.org.uk/>
- The Revenge Porn Helpline supports all adult victims of intimate image abuse living in the UK. You can get in touch for free, confidential help and support.

Domestic abuse:

- National DA HL - <https://www.nationaldahelpline.org.uk/> (Managed by Refuge)
- Refuge - <https://refuge.org.uk/> Empowering women to live without violence & fear. Refuge is the largest domestic abuse organisation in the UK. Supporting thousands of women & their children overcome the physical, emotional, and financial impacts of abuse
- Women's Aid - <https://womensaid.org.uk/>
- Men's Advice Line - <https://mensadvice.org.uk/>

- ManKind Initiative - <https://mankind.org.uk/>

Victim support

- Victim Support is the independent charity dedicated to supporting victims of crime and traumatic incidents in England and Wales. <https://www.victimsupport.org.uk/>
- Rape Crisis England & Wales. Rape Crisis England & Wales is the feminist charity working to end child sexual abuse, rape, sexual assault, sexual harassment and all other forms of sexual violence. <https://rapecrisis.org.uk/>