

# Sky guidance on addressing modern slavery risks in production

## Introduction

This guidance document is designed to assist producers with understanding and addressing risks of slavery and human trafficking in their organisation and supply chain and to put in place good practices.

## What is modern slavery?

- Slavery is defined as occurring where there is both exploitation of a person and coercion to prevent them from leaving
- Human trafficking is when an individual arranges or facilitates the travel of another person with a view to that person being exploited
- Coercion can be physical, sexual, financial, cultural or involve threats of violence (to individuals or families) or psychological manipulation

Slavery and human trafficking occurs all over the world, including the UK

- There are estimated to be between 21m and 46m slaves worldwide
- Approximately 90% of these are thought to be in the private sector
- Slavery is highly profitable, worth c.£150bn annually
- In the UK, it is estimated that there are c.11,700 people in slavery

*Figures from the Global Slavery Index*

## Risk areas for a production

Production usually involves subcontracting services such as catering, security, cleaning and maintenance. These are roles which are often filled by temporary and/or migrant workers who are inherently more vulnerable to poor recruitment practices and working conditions. Production also involves sourcing equipment, clothing and other goods which may have been manufactured by forced or child labour.

## Examples of ways in which it can manifest

- **Debt bondage** – when a person is forced to work to pay off a loan, often at high rates of interest for an indeterminate length of time
- **Wage abuse** – when wages are withheld from workers (e.g. through compulsory savings schemes that are then used to ‘cover costs’ or unexpected deductions)
- **Recruitment fraud** – when a person is recruited expecting a certain salary and working conditions only to find afterwards that the salary is much lower and/or the working conditions are not as expected but the person is at that point unable to leave
- **Removal of identity documents and travel papers** – when a person is recruited from overseas and then has their passport or other ID documents retained so that they are not able to leave
- **Compulsory overtime** – when a person is forced to work long hours for no additional pay and risk a penalty if they refuse
- **Child slavery** – when children are forced to work for example in agriculture, factories, construction, mines, bars, restaurants or tourist environments; or in domestic servitude where they may suffer abuse
- **Forced prison labour** – when prisoners are required to work involuntarily for little or no pay
- **Sexual exploitation** – when people are forced to perform non-consensual or abusive sexual acts against their will for others to profit, e.g. prostitution escort work and pornography.

## What do we expect?

Sky expects you to comply with the Modern Slavery Act 2015 where this applies to your organisation. We also ask that you are alert to the risks, that you check the practices of your suppliers and subcontractors and that, where possible, you put in place actions to mitigate the risks of modern slavery in your operations and those of your supply chains.

Key questions to answer are ‘where within my operations and supply chains might there be one or more risk factors present?’ and ‘what can I do to mitigate the risks identified?’

Sky has outlined risk factors, recommended good practices and details of how to find out more information below:-

### Risk factors

People end up in slavery for a range of different reasons. However, there are inherent vulnerabilities that put some groups at higher risk than others. There are four main areas of risk to consider:

<p><b>Product or industry characteristics:</b></p> <ul style="list-style-type: none"> <li>A. Low-skilled labor, and dirty, dangerous, or difficult work</li> <li>B. Seasonal/contractual or short product lifecycles</li> <li>C. Highly competitive industries, with low barriers to entry</li> </ul> <p><b>Business processes in production / supply:</b></p> <ul style="list-style-type: none"> <li>A. Low cost country manufacturing</li> <li>B. Reliance on labour recruiters</li> <li>C. Long, complex or non-transparent supply chains</li> </ul> <p><b>Workforce characteristics:</b></p> <ul style="list-style-type: none"> <li>A. Poor, vulnerable, low-skilled workers</li> <li>B. Migrant workers</li> </ul>	<p><b>Geographical risk:</b></p> <ul style="list-style-type: none"> <li>A. Weak protection of civil liberties and workers’ rights</li> <li>B. Levels of poverty</li> <li>C. Corruption</li> <li>D. Crime and violence</li> <li>E. Political instability or conflict</li> <li>F. Gender inequality</li> <li>G. Weak protection of migrants</li> <li>H. Natural disasters</li> </ul> <p><i>Risk factors adapted from Verité’s materials on forced labour and human trafficking</i></p>
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### Recommended good practices

- A policy that includes an explicit reference to slavery and trafficking (it doesn’t need to be a separate policy, but could be an amended existing policy)
- A requirement that this policy commitment is also *actively* communicated to your suppliers (not just available on a website)
- Additional checks and a focus on recruitment agencies
- A review of the risk factors related to slavery and an assessment of which workers might fit into the vulnerability categories
- A set of mitigations that target the risks identified – e.g. using subcontractors that have permanent rather than temporary workforces; sourcing equipment from suppliers with shorter supply chains and good practices of their own in place
- A plan to review higher risk areas in more depth
- A way of making workers (both employees and those subcontracted to work) aware of their rights and of potential issues related to slavery and trafficking
- A way for workers (both employees and those subcontracted to work) to raise concerns about themselves or their colleagues that is anonymous, protects them from reprisal, is well known about and is trusted. This could be an external helpline.
- A response plan should an issue be found

### Where to go for further information / resources

- Verité’s materials on forced labour and human trafficking: <http://www.verite.org/forced-labor>
- The US Government database on supply chain/country risks for child labour and forced labour - <http://www.dol.gov/ilab/reports/child-labor/list-of-goods/>
- The US Government’s annual Trafficking in Persons report: <http://www.state.gov/j/tip/rls/tiprpt/>
- Global Slavery Index: <http://www.globalslaveryindex.org/>

- ILO database: [http://laborsta.ilo.org/MDTcountries\\_E.html](http://laborsta.ilo.org/MDTcountries_E.html)
- The Business & Human Rights Resource Centre collates new stories and incidents relate to human rights. Importantly, it asks those accused of human rights abuses to respond to the allegations and publishes these alongside news articles. This is a good place to find case studies of modern slavery and how companies have responded: <http://business-humanrights.org/>
- Guidance to spot the signs of modern slavery: <https://modernslavery.co.uk/spot-the-signs.html>