# Sodexo UK&I Modern Slavery Strategy

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Let's Talk Sustainability

Collaborate Event

Hannah Cowley

Group Sustainable Procurement Lead

Oct25



#### Anti Slavery Week 2025: October 13<sup>th</sup> to October 19th



## Modern Slavery –is closer than you think: Our collaborative programme

Our Aim: Through partnering and practice sharing, we aim to recognise Anti-Slavery Week through raising awareness of Modern Slavery across our Supply Chain, aligned to key considerations within the UK Transparency in Supply Chains (TISC) Guidance.

Session	Theme	Lead	Date / Time	Joining Information
1	Learning from others  It is important that we aim to learn from practice and understand how this topic is addressed by other sectors / organisations.  In this session, Hannah will introduce Madeline Fitton from Sodexo (also the founder of the BSA Modern Slavery Council), who will talk about how a company in an adjacent sector is tackling the issue of Modern Slavery in their organisation, and supply chain.	QinetiQ	8 <sup>th</sup> October 2025 12:00 - 13:00	<u>Link</u> to register / join
2	The vital role of stakeholder engagement  Collaborating with customers, peers, suppliers, and other third parties (such as NGOs) is essential to collectively addressing modern slavery in supply chains. In this session, Karolina will share insights from work with Stronger Together and other stakeholders to develop a more robust due diligence processes around modern slavery. She will also introduce Phillip Clayton and a member of his team, a Lived Experience Consultant from Align Ltd, offering a truly unique opportunity to hear a powerful survivor's story firsthand.	Thales	16 <sup>th</sup> October 2025 11:00 - 12:00	<u>Link</u> to register / join
3	Due Diligence, Risk & Responsibility  Due diligence in supply chains is essential for identifying and mitigating risk related to modern slavery, it serves multiple purposes including: protecting vulnerable workers, reducing legal & reputational risks and aligning with international human rights standard.  In this session Claire will illustrate the importance of undertaking the appropriate due diligence, utilising case studies, lessons learned and how this has shaped modern slavery reporting within NATS	NATS	22 <sup>nd</sup> October 2025 14:00 – 15:00	Link to join (Teams) Meeting ID: 326 281 780 428 7 Passcode: wg2bY9QQ
4	Understanding Vulnerability Understanding the different lenses through which to view potential Modern Slavery Vulnerability is important in order to build context and determine priorities. In this session Neil will outline the 3 key lenses that are considered when looking at the Modern Slavery Vulnerability, together with some key aspects related to each of these.	BAE Systems	29 <sup>th</sup> October 2025 12:00 – 13:00	<u>Link</u> to join (Teams) Meeting ID: 316 547 026 572 2 Passcode: Go6Sr39J
5	The importance of data  The data collected through JOSCAR plays a critical role in understanding and addressing risks within supply chains, providing greater transparency on issues like modern slavery and human rights. This session will focus on the information gathered through the JOSCAR questionnaire and explore the key themes identified across the dataset. Hellios will be joined by Steve New Associate Professor, Saïd Business School, University of Oxford, and Non-Executive Director, Hellios, who will provide insight into these data trends and discuss the importance of accurate data.	Hellios	5 <sup>th</sup> November 2025 13:00 – 14:00	To be issued to JOSCAR members directly via Hellios











#### Madeline Fitton MCIPS Chartered Status

- 25 Years Procurement and Ethical Trading Experience:
- Hallmark, Atkins, Marshalls, NHS Supply Chain, OCS, Sodexo
- Founder and Chair BSA Modern Slavery Council
- Founder and Chair Ireland Modern Slavery Council
- Winner Unseen Business Awards Individual Impact 2023
- Shortlisted Unseen Business Awards –
   Partnership 2025
- CPO Strategy Sustainable Procurement Champion Index 2023 & 2024
- BSI Human Rights Due Diligence Committee Member
- Shortlisted for CIPS Excellence in Procurement Awards – Sustainable Procurement Champion

















# What is Modern Slavery?

- Modern slavery the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation
- 49.6 million victims worldwide
- 25 million in forced labour
- 175,000 living in modern slavery in the UK\*
- 8,000 living in modern slavery in ROI



\*Source: ILO and GSI

### ROOT CAUSES OF FORCED LABOUR

#### Supply side

- Poverty
- Discrimination against particular groups that deny them rights/ access to decent employment/ opportunities
- Limited labour protections
- State-imposed forced labour



#### **Demand side**

- Purchasing power and leverage of particular businesses
- Outsourcing, which fragments responsibility for labour standards and makes oversight and accountability very difficult
- Irresponsible sourcing practices
- Governance gaps



# Modern Slavery Why



175,000 people UK

49.6 million people GLOBAL

10 million UP in 5 years £40BN cost to UK

Taxpayer

3335 live police investigations in 2021



German Supply Chain Due Diligence Act Penalty 2% Average Annual Global Turnover



UK Procurement Act 2023

Exclusion from public tenders 5 years



Canada - Fighting Against Forced Labour and Child Labour in Supply Chains Act Penalty \$250k on failure to report



Norway Transparency Act
Penalty 4% company annual turnover or 25
million Kroner (the higher fee to be paid)



ESRS / CS3D / Forced Labour Directive

Must not be less than 5% of net worldwide turnover





Modern Slavery

How

#### **Educate others**

Use our knowledge to ensure as many as possible know exactly how to deal with the entire MS issue

#### Stop at source

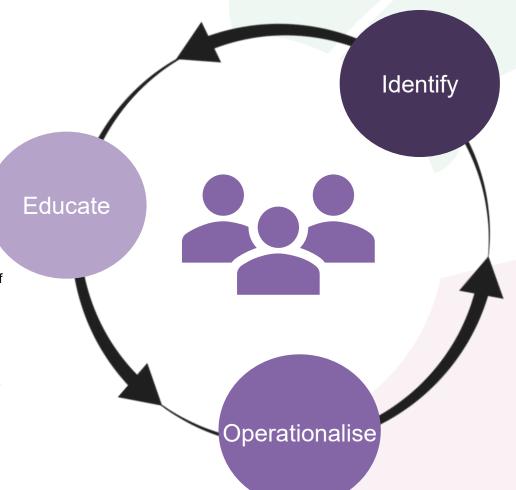
Educate and arm people worldwide with information about MS and ways to avoid entrapment

#### **Promote MS orgs**

Guide organisations to support and promote all of the anti slavery entities worldwide who can stop this from happening

#### **Next Generation**

Support children to know about MS, to actively reject MS and to know how to manage MS in any life path



#### Identify

Train everyone so that anyone in the organisation can see victims in plain sight

#### **Look Harder**

Do more checks, be more vigilant, keep looking, get independents to check. Due diligence on more tiers, suppliers doing more due diligence on more tiers

#### **Extract**

After identifying victims, remove and support to enable positive outcomes

#### Remediation

Employ survivors to prevent a return to MS and a failure to prosecute criminals

# Support those most at risk

Contribute to organisations creating different futures for those who would be vulnerable to being manipulated

#### Raise the Profile

Keep talking about MS with any organisation and company who will listen. Keep up the pressure on other corporates to follow suit and arm them with the information we have to enable this.

#### **Promote collaboration**

No one person or organisation or Government can do this alone. Actively bring together collaboration to expand the united front against slavery

#### **Remove Demand**

Pressure on suppliers, clients and networks to understand what MS is and how to make sure it doesn't occur in their organisations. Make supply chains actively reject the environments needed for MS to thrive

#### **Eliminating Modern Slavery**











#### Compliance

- → Supply base risk review
- --> Ecovadis risk management
- Modern slavery audit and compliance programme
- → Speak Up



#### Education

- Modern slavery risk training
- --> Responsible Business Conduct
- --> Frontline training



Leverage

- Strategic supplier forum
- → BSA Modern Slavery Council
- → Ireland Modern Slavery Council
- → Business Against Modern Slavery







# What steps can you take?

What should you have in place?



**BSA Modern Slavery Toolkit** 

BSA-Frontline-Workers-Modern-Slavery-Pack.pdf



# What is your plan?

What will you do when you find it?



**BSA Modern Slavery Toolkit** 

BSA-Frontline-Workers-Modern-Slavery-Pack.pdf

Victim Centred

Supportive

Fear

Risk

Route to Police

Outreach Workers



- 30+ members
- Over 2 billion employees globally across all members
- FM, Construction, IT, Services, Projects, Legal, NGO's, Charities
- Supported by the Home Office and Cabinet Office
- Aided by the Gangmasters and Labour Abuse Authority and the Independent Anti Slavery Commissioner
- Supported by Hope for Justice, Slave Free Alliance, Supply Chain Sustainability School, Scotland Against Modern Slavery, Unseen, Stronger Together, Alcumus, Modern Slavery Intelligence Network, Action Sustainability



- 76 members
- Across the entire Irish economy
- Non lobbying
- Enable businesses to tackle modern slavery
- FM, Retail, Property Management, Agri-food, An Garda Siochana, Semi States, Finance, Construction
- Supported by the Ireland Government, Irish Human Rights and Equalities Commission and Irish Coalition for Business & Human Rights
- Supported by Hope for Justice, Slave Free Alliance, Supply Chain Sustainability School, Unseen & Stronger Together