Modern Slavery
A Practical Perspective for Higher Education Institutions

Today’s Presenters

Sarah Carpenter
Assent Compliance
Senior Business & Human Rights Analyst

Kirill Boychenko
International Labor Rights Forum
Campaign Coordinator
Agenda

1. Emerging Risks in Your Supply Chain
2. Conducting Due Diligence
3. Best Practice & Practical Tools

Introduction
Assent Overview

- **40%** | Assent Works With 40% of S&P 500 Product Companies
- **300k** | 300,000 Supplier Companies
- | A Partner You Can Grow With
- | Global Footprint

International Labor Rights Forum Overview

**INTERNATIONAL LABOR RIGHTS FORUM**

**DIGNITY AND JUSTICE FOR WORKERS WORLDWIDE**
Human Trafficking: A Profitable Industry

INTERNATIONAL CRIME INDUSTRIES:

1. Illegal drugs
2. Arms trafficking
3. Human trafficking

$32 billion generated annually

$15.5 billion from industrialized countries

Data source: United Nations Office on Drugs and Crime
Modern Slavery Contextualized

Source: The Economist

Supply Chains: Fertile Ground for Modern Slavery

77% of companies believe there is a likelihood of modern slavery occurring at some stage in their supply chains.

Source: Ethical Trading Initiative
Slavery: A High-Profile Human Rights Issue

The Guardian

Georgetown students occupy president’s office as part of Nike protest

Student-led workers’ rights group demands John DeGioia deny Nike a new contract in 2017 over ‘deplorable’ conditions under operator of Vietnam factory
Slavery: A High-Profile Human Rights Issue

Educational institutions fail to respond to questions on migrant worker welfare in Qatar & UAE operations

A Legal Compliance Issue Too

- California Transparency in Supply Chains Act
- U.S. Federal Acquisition Regulation Final Rule on Combating Trafficking in Persons (92.222-50)
- UK Modern Slavery Act
- U.S. Trade Facilitation and Trade Enforcement Act, elimination of consumptive demand exception
- EU Non-Financial Reporting Directive

- September 2010
- January 2015
- March 2015
- February 2016
- January 2017

- French Corporate Duty of Vigilance Law
- Countering America's Adversaries Through Sanctions Act
- Australia Modern Slavery Act
- Dutch Child Labor Due Diligence Law
- Swiss Responsible Business Initiative

- February 2017
- August 2017
- Forthcoming
- Forthcoming
- Forthcoming
Notable findings:
- Some universities are voluntarily choosing to publicly report on their practices
- Managing risk in the supply chain is weak

"This demonstrates that a significant number of institutions are still not aware of the impact that their purchasing decisions may be having beyond their own gates and how the products they buy may be produced in conditions of abuse."
What Does This Mean For You?

1. Slavery persists in global and domestic supply chains.

1. Awareness is growing and students expect their educational institutions to take action.

1. Slavery in supply chains has become a legal compliance issue.

1. Organizations showing commitment and transparency are being publicly praised, even if their programs are not perfect.

Due Diligence: The Standard

The UN Guiding Principles on Business and Human Rights

- **Identify**
  - supply chain risk

- **Mitigate and Prevent**
  - supply chain risk

- **Account**
  - for how you're addressing supply chain risk
Code of Conduct & Contract Terms

- Addresses enabling factors and contributors to slavery and human trafficking.

Supply Chain Mapping

- Trace direct, indirect and labor supply chains.
Risk Assessment

Risk Screen (Part I): Informed by supply chain map findings and draws on data from:
- Government, NGOs, academic research.
- Grievance mechanism findings.
- Etc.

Formal Risk Assessment (Part II): Identifies risk at the individual supplier level and fosters constructive dialogue with suppliers.

Audits & Corrective Actions

- Deception and lies are a defining feature of modern slavery. Auditors need the right skills and experience to detect it.
- From police to partner.
Reporting

- Transparency is necessary, even when an instance of slavery is found.
- Reports must speak to a range of audiences.

Upward Trend

UK MSA Scores

Source: Development International (2018)
Practical Tool

Slavery & Trafficking Risk Template (STRT)

- Open-source template used to assess and prioritize supply chain risk.
- Includes 20 questions and requests for supporting documentation.
- Microsoft Excel format.
- Download at sraglobal.org.

Practical Tool

Checkpoints

- The app allows business managers and auditors to create interactive checklists that help them ensure an operation free of forced labor.
- There are 38 checkpoints in total. Each one provides best-practice recommendations for taking action.
Practical Tool

Comply Chain
8 steps to reduce child labor and forced labor in global supply chains.

Best Practice & Practical Tools

- The Fair Food Program in the United States
- The National Pact to Eradicate Slave Labor in Brazil
- Partnerships to prevent forced and child labor (e.g. Cotton Campaign)
Conclusion

Questions & Answers