



UK MSA Indicators 2020

Development International e.V.

To statements pursuant to the UK MSA we apply 67 binary yes/no indicators, weighted equally.

These indicators cover three research dimensions:

1. **Legal disclosure compliance:** 9 indicators concerning items that, as per the law, are *mandatory* to disclose. These indicators are based solely on the law's verbatim. To be awarded full marks on this dimension, the organisation does not need to have an active anti-slavery/anti-human trafficking programme in place.

2. **Disclosure conformance:** 14 indicators, also as per the law's verbatim, assessing the organisation's adherence to the disclosure topics recommended by the law in Article 5 of its Section 54. These are 6 topics which an organisation "should aim to include information about" (UK Home Office, 2017: 12), namely:
 - a. *the organisation's structure, its business and its supply chains;*
 - b. *its policies in relation to slavery and human trafficking;*
 - c. *its due diligence processes in relation to slavery and human trafficking in its business and supply chains;*
 - d. *the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;*
 - e. *its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate;*
 - f. *the training about slavery and human trafficking available to its staff.*

3. **AS/AHT good practice:** 44 indicators, premised on the law, which benchmark "operational elements that comprise a given organisation's Anti-Slavery/Anti-Human Trafficking program" (Bayer, Hudson et al, 2018: 16). These indicators are based on a review and identification of relevant practices reported in MSA statements in the past, thus encompassing AS/AHT measures that various organisations have already deployed on the field.

rubric	indicator	indicator type	indicator #	answer	
legal compliance	Included a link to the slavery and human trafficking statement on website's homepage?	compliance	1	Y/N	
	Signed by director (corp), designated member (LLP), or partner (partnerships)?	compliance	2	Y/N	
	Approved by the board of directors or equivalent management body [except LLPs]?	compliance	3	Y/N	
	Explanation of steps organisation has or has not taken to ensure slavery and human trafficking is not taking place:	a) in any of its supply chains?	compliance	4	Y/N
		b) in any part of its own business?	compliance	5	Y/N
	Does the statement:	include a defined fiscal year period , which the contents of the statement are meant to cover?	compliance	6	Y/N
		comply with the annual publication requirement of the MSA?	compliance	7	Y/N
		identify which individual company(ies) is/are covered under the statement?	compliance	8	Y/N
		make clear it is pursuant to the MSA?	compliance	9	Y/N



Disclosure conformance, AS/AHT good practice	basics	(a) information the organisation's structure , its business and its supply chains ;	Does the organisation provide information about its: STRUCTURE ?	conformance	10	Y/N
			Does the organisation provide information about its: BUSINESS ?	conformance	11	Y/N
			Does the organisation provide information about its: (1) supply/service chains ? <i>or</i> (2) goods/services it procures directly for its operations (e.g. equipment, vehicles, etc.)?	conformance	12	Y/N
			Supply/ service chains mapped down to level of raw materials or sub-contracting – and provided examples in statement?	good practice	13	Y/N
			Included visual diagram (e.g. charts/ maps) of: supply/ service chain <i>or</i> business activities ?	good practice	14	Y/N
			1. Does the organisation have a distinct ANTI-SLAVERY policy for their business ? <i>or</i> 2. Has the organisation incorporated ANTI-SLAVERY-specific principles into their existing policies (e.g. in supplier code of conduct)?	conformance	15	Y/N
	policy	(b) information about its policies in relation to slavery and human trafficking;	Policy implementation, in particular by incorporating ANTI-SLAVERY-relevant policies into supplier/service provider contract clauses ?	good practice	16	Y/N
			Policy enforcement, including consequences for non-performance including suspension or termination of offending suppliers / providers?	good practice	17	Y/N
			Does the organisation require enforcement of " employer pays " principle?	good practice	18	Y/N
			Is the organisation certified by the Living Wage Foundation?	good practice	19	Y/N
			Do the organisation's policies support freedom of association and collective bargaining rights in its value chains?	good practice	20	Y/N
	Due diligence	(c) information about its due diligence	Does the organisation provide information about its due diligence processes in relation to Modern Slavery in its: BUSINESS ?	conformance	21	Y/N



	processes in relation to slavery and human trafficking in its business and supply chains:	Does the organisation provide information about its due diligence processes in relation to Modern Slavery in its: SUPPLY/SERVICE CHAINS (including clients, procurement)?	conformance	22	Y/N
		Due diligence standard referenced?	good practice	23	Y/N
		Prospective business activities (e.g. hiring employees) evaluated based on ANTI-SLAVERY criteria?	good practice	24	Y/N
		Prospective suppliers/providers evaluated/screened based on ANTI-SLAVERY criteria?	good practice	25	Y/N
modern slavery risk: parts, assessment, and management	(d) Information about the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and	Does the organisation provide information about the parts of its BUSINESS where there is a risk of Modern Slavery taking place?	conformance	26	Y/N
		Does the organisation provide information about the parts of its SUPPLY/SERVICE CHAINS (e.g. procurement) where there is a risk of Modern Slavery taking place?	conformance	27	Y/N
		Modern Slavery risks in business described?	good practice	28	Y/N
		Modern Slavery risks in supply/ service chains described?	good practice	29	Y/N
		Does the organisation describe steps it has taken to ASSESS the risk of Modern Slavery in its BUSINESS ?	conformance	30	Y/N
		Does the organisation describe steps it has taken to MANAGE the risk of Modern Slavery in its BUSINESS ?	conformance	31	Y/N
		Does the organisation describe steps it has taken to ASSESS the risk of Modern Slavery in its SUPPLY/ SERVICE CHAINS (e.g. procurement)?	conformance	32	Y/N
		Does the organisation describe steps it has taken to MANAGE the risk of Modern Slavery in its SUPPLY/ SERVICE CHAINS (e.g. procurement)?	conformance	33	Y/N
	Metrics (KPIs) for business risk assessment discussed (e.g. frequency of risk assessment, % assessed)?	good practice	34	Y/N	



audits	manage that risk;	Metrics (KPIs) for <u>supplier/provider</u> risk assessment discussed (e.g. frequency of risk assessment, % of suppliers assessed)?	good practice	35	Y/N
		Did the organisation specify that its risk assessment covered at least 80% of its total spend in its value chains?	good practice	36	Y/N
		Did the organisation participate in pre-competitive, collective working groups (e.g. industry working groups, joint initiatives) on relevant issues (e.g. audit non-conformances, wages and working hours, joint remediation, worker voice, forced labour, etc.)?	good practice	37	Y/N
		Has the organisation taken measures to support freedom of association and collective bargaining rights in its value chains?	good practice	38	Y/N
	Audits of its own <u>business activities</u> performed?	good practice	39	Y/N	
	Were the audits of its own business activities performed by a third party ?	good practice	40	Y/N	
	Metrics (KPIs) for <u>business</u> audits discussed (e.g. frequency of audits)?	good practice	41	Y/N	
	Were audits of suppliers/providers performed?	good practice	42	Y/N	
	Did the audits check whether workers are properly paid for all labour hours ?	good practice	43	Y/N	
	Did the audits check whether all labour is voluntary ?	good practice	44	Y/N	
	Did the audits check whether suppliers comply with all employment age laws and standards?	good practice	45	Y/N	
	Did the audits check whether suppliers comply with ILO rules/ETI Base code ?	good practice	46	Y/N	
	Did the audits check whether working hours are not excessive and are consistent with local laws and standards?	good practice	47	Y/N	
	Did the audits check whether production conditions meet health and safety standards ?	good practice	48	Y/N	
	Were the audits of suppliers/ providers performed by a third party ?	good practice	49	Y/N	
	Metrics (KPIs) for <u>supplier/ provider</u> audits discussed (e.g. frequency of audits)?	good practice	50	Y/N	
	Company publicly reports the findings of its supplier/provider audits , including the nature of non-conformances?	good practice	51	Y/N	
Site visits and/or spot checks at <u>supplier/provider sites</u> further down the supply/ service chains?	good practice	52	Y/N		



grievance mechanism / ethics		Does the organisation maintain a whistleblower/grievance mechanism or ethics hotline within its own business ?	good practice	53	Y/N
		Existence of third party-managed whistleblowing/grievance mechanism ?	good practice	54	Y/N
		Does the organisation maintain a worker-level incident detection and reporting system or whistleblower/grievance mechanism for its supply/service chains (e.g. operational-level)?	good practice	55	Y/N
		Is there a third party managed worker-level grievance or whistleblower mechanism for its supply/service chains ?	good practice	56	Y/N
		Were modern slavery-relevant cases (incidents) reported through the third party managed worker-level grievance or whistleblower mechanism?	good practice	57	Y/N
		Did the company have a “non-retaliation” policy in place to protect whistleblowers?	good practice	58	Y/N
effectiveness	(e) Information about its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against performance indicators	Does the organisation provide information about its effectiveness in eliminating Modern Slavery from its business or supply chains, measured against such performance indicators as it considers appropriate?	conformance	59	Y/N
		Year-over-year improvement/change measured based on the selected KPIs?	good practice	60	Y/N
		Remediation of specific incidents/cases discussed?	good practice	61	Y/N
		Were Corrective Action Plans (CAPs) relating to labour practices instituted and monitored?	good practice	62	Y/N
		Does the organisation use a standard minute costing system with its suppliers (which creates transparency in the company's product cost for materials, labour and overhead)?	good practice	63	Y/N



training	(f) Information about the training about slavery and human trafficking available to its staff.	1. Does the organisation have a distinct MODERN SLAVERY training programme for their business? <i>or</i> 2. Has the organisation incorporated MODERN SLAVERY-specific training into their existing training programme?	conformance	64		Y/N
		Appropriate training delivered to the relevant parties within the company (e.g. procurement, management, legal, etc.)?	good practice	65		Y/N
		Company also offered training to high-spend or high-risk tier 1 suppliers/providers ?	good practice	66		Y/N
		Anti-Slavery / Anti-Human Trafficking training done by 3rd party?	good practice	67		Y/N

