

MODERN SLAVERY INTELLIGENCE NETWORK

MSIN Conference Summary – 15 June 2022

Hosted by G's Fresh, Barway, Ely

Introduction

In January 2020, Dame Sara Thornton, then Independent Anti-Slavery Commissioner, challenged the UK food industry to establish a mechanism to share information and intelligence that would enable the early identification of victims and perpetrators.

The Modern Slavery Intelligence Network (MSIN) was formed by several retailers and food manufacturers, and began an 18-month pilot at the end of 2020 to develop a structured intelligence-sharing mechanism for the food sector. This conference represents the end of the pilot and a report back to stakeholders and the wider industry on MSIN's progress, emerging risks and potential next steps.

The conference comprised facilitated panel sessions, expert speaker presentations and an interactive session to examine the core themes of Prevention, Investigation and Remediation of modern slavery.

AGENDA

Time	
9.30am	Arrival
10.00am	Welcome
10.10am	Panel discussion: Emerging labour risks affecting the food and agricultural sectors
10.50am	Addressing labour risks in the Seasonal Workers Scheme
11.30am	Break
12.00pm	Review of the Modern Slavery Intelligence Network Pilot

Time	
12.45pm	Keynote speech: Professor Dame Sara Thornton DBE QPM
1.15pm	Lunch
2.15pm	Inspiring collaboration to address labour exploitation and modern slavery, now and in the future
3.00pm	Addressing systemic labour challenges
3.45pm	Wrap up and next steps
4.00pm	Conference ends

www.msin.org.uk

Link to [speaker information and biographies](#)

Panel Session: Emerging labour risks affecting the food and agricultural sectors

Ian Waterfield, Director of Operations, GLAA; **Vicky Dodman**, Human Rights Lead for Foods, M&S; **Derek Wilkinson**, MD, Sandfields Farms, part of the Shropshire Group; **Paul McNulty**, UK and Europe Programme Director, Hope for Justice – facilitated by **Steve Gibbons**, Ergon

Key changes since the 2020 conference:

- Increasing labour shortages across the industry.
- New recruitment challenges presented due to Brexit, Covid and global conflict.
- Workers arriving from new source countries with established recruitment fee issues, lower worker rights awareness and limited relationships with UK enforcement bodies.
- The Immigration & Borders Bill is creating new vulnerabilities and exacerbating the potential for migrants to enter conditions of modern slavery and exploitation.
- The Seasonal Worker Scheme (SWS) is not effectively managing risk to workers.

Current challenges

- More direct and honest conversations with government are required to address the issues.
- A focus is needed on early intervention and prevention at point of recruitment.
- A big issue is people paying for jobs and All businesses can be affected by recruitment fee exploitation, including smaller ones.
- It's about global supply chains, not only the UK – migrants are vulnerable no matter where they are in the world.
- The capability and capacity of enforcement bodies is increasingly limited.

Improvement priorities

- Access to remedy for victims.
- Prevention through awareness raising in sourcing countries.
- More effective Labour Provider licensing.
- Establishment of the Single Enforcement Body to coordinate action on these issues.

Expert Speakers: Finding ways forward to address labour risks in the Seasonal Workers Scheme

David Camp, Chief Executive, ALP

Context

- 40,000 SWS visas available for 2022: 38,000 in horticulture & 2,000 in poultry processing.
- 4 labour provider Scheme Operators sourcing seasonal workers for up to 6 months.
- Workers recruited from any country, traditionally Eastern Europe but increasingly Central Asia.
- £10.10 hr minimum wage, workers can legally pay for their visa and travel to the UK.

Issues reported by NGOs & workers

- High risk of unfree recruitment
- Incurring debt to cover visa and transport costs.
- No/poorly translated contracts
- Unsafe/dirty accommodation
- Unfair piece rates
- Unlawful accommodation and PPE costs
- Racism, discrimination, or mistreatment by managers

Root Causes:

- Scheme rules and Home Office actions
- Hidden third party exploitation during recruitment
- Recruitment practices & application of scheme rules by Scheme Operators
- Standards and treatment by farm
- Hidden third party exploitation on farm
- Application of Scheme rules by operators
- External – weather, crop failure, global events

More information can be found on the [ALP website](#)

Karen Goode, Head of Commercial Operations, Concordia

Scheme Operator Challenges

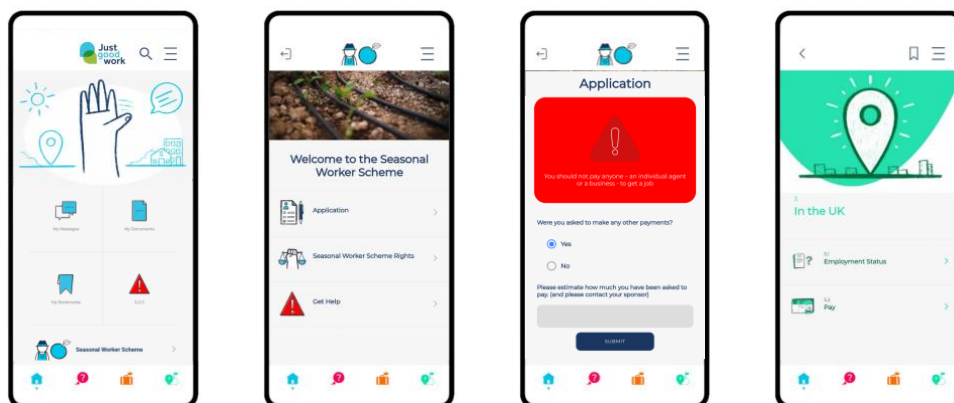
- Cultural norms around paying for work
- Undue influence of local people
- Unscrupulous operators & third parties
- Multiple opportunities for infiltration throughout the recruitment journey
- Language barriers
- Intimidation or coercion of potential victims
- Financial control of potential victims.
- Lack of resources & help for victims.

Potential Solutions

- Break down cultural assumptions in sourcing countries with “No Fee” campaigns
- Word of mouth by returning workers
- Stronger punishment for perpetrators
- Increased worker welfare checks
- Police support in all countries
- Building worker awareness of labour rights, living and working conditions
- Increased signposting of resources

Courtenay Forbes, Human Rights Manager, Tesco and **Quintin Lake**, Director, Fifty Eight

- Introduced the **Just Good Work** smartphone app for seasonal and migrant workers
- **UK supermarkets, SWS operators, Gangmasters and Labour Abuse Authority, Association of Labour Providers (ALP)** have collaborated to help workers to access quality and safe seasonal work in the UK.
- **The Just Good Work app provides clear advice and guidance for workers in their own language**, helping protect workers from hidden exploitation risks during recruitment and on farm, and make sure they have a positive experience when working in UK agriculture.



More information can be found at the [Just Good Work website](#)

Expert Speaker: A Review of the MSIN Pilot

Beverly Dixon, Group HR Director G's Fresh and Chair of MSIN's Technical Action Group
[Link to full presentation](#)

The MSIN brings together different stakeholders in the food supply chain to share information and intelligence on labour exploitation with their competitors and clients. The Network's vision is:

“Intelligence provided from the platform enables users to detect, prevent and disrupt modern slavery and improve people's lives”

- The MSIN worked with key partner, [STOP THE TRAFFIK](#) to develop the right platform with appropriate safeguards for intelligence sharing.
- The MSIN members also provided input from colleagues in Data Security, Cyber Security, Data Protection and Legal teams to test and improve the platform and agreements. The level of collaboration between member companies demonstrates the consistency in values among those dedicated to addressing labour exploitation.

- [Freshfields Bruckhaus Deringer LLP](#) provided pro bono legal support, enabling members to overcome the internal and external barriers to achieve a working system.
- The MSIN developed a detailed **theory of change** to demonstrate outcomes and impacts. This including the actions taken as a result of MSIN intelligence to **investigate, prevent, disrupt** or **remediate** labour exploitation, whilst maintaining a victim-centric approach.
- The MSIN is not just a technical platform, it's also a community of practitioners who are learning from each other, sharing insights and ideas.
- We are constantly facing new and evolving forms of labour exploitation and the Network is providing that safe haven for those addressing the risks to share their insights and challenges with peers.
- In the first 8 weeks since intelligence-sharing started, members shared 19 pieces of high-quality intelligence, 56% of which led to direct investigative action.

MSIN Member Feedback: *Mel Miles, Head of Human Rights, Greencore*

- We can see that exploitation is a reality in our business and supply chains
- We joined the MSIN to support our colleagues and disrupt labour exploitation
- If we find something in the supply chain, we now have a way of raising it in a safe space and sharing intelligence
- And we were curious about what others were finding
- The MSIN database is working really well for us

Keynote Speech

Professor Dame Sara Thornton DBE QPM, former Independent Anti-Slavery Commissioner

Having recently completed a 3-year term as the IASC, Dame Sara has now moved to the Rights Lab at the University of Nottingham to research the areas of prevention, business responses, supply chains and the financial sector's role in tackling modern slavery.

Key messages:

- The role of the IASC should focus on criminal justice AND a human rights-based approach
- There is no lack of potential victims in the UK – we can't eradicate slavery by focusing on harm after it has occurred
- We need to focus on prevention using a public health model:
 - Primary prevention – immunising the population by raising awareness
 - Secondary prevention – catching exploitation early and intervening to prevent long-term harm
 - Tertiary prevention – reducing the severity of the harm caused, helping survivors to recover and taking action to prevent re-exploitation
- The Home Office saw the SWS as a short-term solution with the long-term answer being a combination of mechanical and British workers – this is not realistic
- The food industry can work with DEFRA to help the Home Office improve the SWS scheme – “keep on lobbying”!
- Remediation is important – how to support workers who have paid recruitment fees
- Don't transfer all problems upstream to source countries – there are problems in the UK as well, eg unsanitary conditions and poor accommodation

Three issues to be aware of in the next 12 months:

- Modern Slavery Bill in the Queen's Speech
- New Home Office strategy on Modern Slavery which is likely to be heavy on prevention
- What's happening elsewhere in the world – the EU Corporate Sustainability Directive, US Import Bans, the German Supply Chain Due Diligence Act

The MSIN is a great initiative and now needs to be made sustainable:

- Build relationships with other stakeholders – there are different sorts of relationships needed with law enforcement and NGOs but it is important to bring others with you
- Measure success – are the actions taken new or would they have happened anyway? Consider independent evaluation
- Do you want to grow? If so how, when and have you consulted people?

Expert Speakers: Inspiring collaboration: investigation, remediation and prevention

Rob Richardson, Head of Modern Slavery & Human Trafficking Unit, National Crime Agency

Business has a key role to play in supporting evidence gathering and law enforcement activity:

- Developing good practices to prevent exploitation in supply chains
- Be the eyes and ears on the ground
- Enable two way sharing of intelligence products
- Law enforcement will not typically respond to single strands of information so MSIN is very valuable in corroborating intelligence

Opportunities for the MSIN and NCA to work together - how the relationship could evolve:

- Develop a shared understanding of the threats
- Collaborate to develop more effective prevention strategies
- Deliver strategic communications through supply chains
- Support collaborative engagement with NGOs and academia
- Local authority and wider public sector engagement
- MSIN has a significant reach and is able to get messages out to stakeholders that law enforcement cannot always reach
- Conversely, MSIN can work with the NCA to get messages to ministers through the NCA's regular briefings

Jane Bladon, Partner/Director, TylerBladon Practical Ethics (presenting slides from Unseen)

Case study from [Unseen](#)

- Case study presented relating to the potential exploitation of workers in a Distribution Centre, including issues around houses of multiple occupancy (HMOs)
- Example of how cases can rapidly evolve as more information becomes available
- Demonstrates the need for expert support in these cases
- Unseen supported the business to consider what mechanisms could be put in place to avoid future incidents.

Top remediation tips

- First and foremost- Protect the victims
- Treat each case individually, be flexible with your approach
- Reach out and get to know with the organisations that support survivors, get ahead and build the network *before* your first case
- Repay lost earnings, and offer to help with other essentials such as food, toiletries etc, assess their needs and act.
- Be transparent and report all incidences
- Pause, think, reflect, review, learn and share those key insights

Ruth Dearnley OBE, CEO, STOP THE TRAFFIK

- Through collaboration, we become more dangerous to networks doing the harm.
- It needs us all to contribute – you can't stop what you can't see.
- Transparency trumps everything.
- We will never prosecute or rescue our way out of modern slavery but we can disrupt.
- It's a difficult road but it's an open road.

Interactive Session: Addressing systemic labour challenges in the food and ag sector

1) Good Practice

Prevention	Investigation	Remediation
Rights awareness in country of origin – Just Good Work app	Stronger Together toolkit on investigation	Community Outreach support in Leicester
Grievance mechanisms		Bright Future
Ethical audits & site visits		Hope for Justice

2) Information Sharing

What to Share	Other Types of Collaboration
Policies and procedures	Local and regional MS partnerships
Good practice guidance	Mobile apps – Car Wash, Just Good Work
Cases – what works and what doesn't	Collective remediation opportunities
Technology based solutions	Translation of resources & guidance
How to engage senior stakeholders	Consistent and clear training
Insights and trends on MS and trafficking	Cross-sector groups – Construction, Care
Remediation examples	Regional package of support measures

3) Opportunities for the MSIN

Creation of escalation protocols	Collaboration with other MS networks
Creation of a formal case handling process	Facilitated regional forums
Consistent reporting on MS activity	Enriching the national intel picture
Providing a link between victims and law enforcement	Generating active examples of how remediation can be delivered effectively
Getting other sectors / industries involved	Government advocacy on MS
Engagement with victim centred organisations	Research on successful collaborations

4) Additional food sector requirements

Prevention	Investigation	Remediation
Verified access to labour providers and governing bodies	Revive the GLAA protocol to give clear roles and responsibilities	More practical examples of financial remediation
Greater visibility of MS prosecutions	Careful use of audit – accommodation, social audit, responsible recruitment	Maintaining connections with victims after remediation/ NRM
Better training and development for site level modern slavery officers	Build capacity in enforcement to increase amount of investigation	Examples of successful remediation and restitution for survivors of MS

Insights from session post-it notes & flip charts

- Collaboration, connecting, communicating and sharing with like-minded organisations is key to improving transparency and information sharing.
- Insight into emerging risks and trends is vital – e.g. conflict in Ukraine, labour shortages, industry perception of the Seasonal Worker Scheme (SWS).
- Desire for greater understanding of MSIN activity and how to get involved.
- Support required to measure progress and judge success.
- Better understanding still required on to spot the signs of exploitation and manage issues.
- Don't assume modern slavery issues are only the responsibility of management.
- How can modern slavery initiatives be implemented in global supply chains where industry standards and legal requirements conflict with modern slavery protocols?
- There is a need for better enforcement outcomes and greater government ownership.
- There is still a fear of retribution from customers (retailers) if issues are reported.
- How can we engage those not here today?