

## Modern Slavery Intelligence Network

### What is the Modern Slavery Intelligence Network?

The Modern Slavery Intelligence Network (MSIN) is a pioneering non-profit collaboration in the UK food and agriculture sector created in response to the findings of Operation Fort, the UK's largest ever modern slavery investigation.

Coming together in 2020, 14 member companies have been engaged in a pilot to develop an innovative and proactive intelligence-sharing mechanism to enhance their effectiveness in disrupting modern slavery and labour exploitation within the UK.

### What does the MSIN hope to achieve?

The aim is that information generated by the network will be used to detect, prevent, and disrupt modern slavery and labour exploitation activity, protecting workers and improving outcomes for those directly impacted.

### What support has the network received?

MSIN benefits from strong support from the office of the former Independent Anti-Slavery Commissioner, GLAA and the Information Commissioners Office.

### Which companies were founding members of MSIN?

- 2SFG
- Bakkavor
- Fresca Group
- G's Fresh
- Greencore
- Sainsbury's
- Marks and Spencer
- NWF Ltd
- Pilgrims Foods Ltd
- Samworth Brothers
- Tesco
- The Co-operative Group
- Waitrose
- Morrisons

## FAQ on prospective membership

### Why join MSIN? What are the member benefits?

- Work collaboratively with likeminded businesses from across the industry in tackling modern slavery and labour exploitation, with a victim-centered approach.
- Share details of incidents or suspected incidents of modern slavery or worker exploitation through the online platform. Reasons to share are to:
  - Validate information against other sources
  - Request checks from other members on specific names, places or organisations
  - Build potential actionable cases collaboratively
  - Understand whether other members are seeing similar incidents, patterns or issues
  - Find effective ways to collaborate that disrupt, prevent or remediate labour exploitation
  - Learn from past cases and from peers in order to improve member understanding of ways to address different labour scenarios
  - Contribute to a broader picture of trends that could provide opportunities to disrupt or prevent labour exploitation
  - Help identify new forms of exploitation not previously recognised or understood

- Opportunities to share learnings and best practice, to help develop standards across the industry
- Regular insights and touchpoints to meet and discuss with members
  - Monthly newsletter
  - Monthly TAG meetings with all members
  - Quarterly in person Review and Learning Days with all members
  - Annual conference (?)
- The opportunity to be part of the ongoing development of this pioneering, proactive and innovative network.

### **How does it work?**

- Members share data through a fully secure online database, which is managed by Stop the Traffik (NGO and independent international charity). The data entered into this secure area is only accessible by the Stop the Traffik (STT) analysts and the member who has submitted the data.
- STT analyse and enrich the data using dedicated tools and resources. This enables the MSIN to build a robust evidence base that can be shared with its members.
- All members have access to a shared database, which contains anonymised and redacted information taken from the secure database. Information to be shared is determined by the member who enters the data, supported by the STT analyst
- STT provides members with expert analysis and guidance on modern slavery prevention and remediation.
- There is an alert system for issues or concerns, allowing real time data sharing e.g. email alerts can be classified as time sensitive for members to respond
- Monthly newsletter reports provide updates on information that has been shared and a deeper insight into current issues and trends.

### **How is data shared and stored?**

Stop the Traffik provides a secure platform for information and intelligence sharing, along with expert analysis and guidance on modern slavery prevention and remediation. Members share details of incidents or suspected incidents of modern slavery or worker exploitation through the online platform with Stop the Traffik, who will then analyse and enrich the data using dedicated tools and resources. This enables the MSIN to build a robust evidence base that can be shared with members and, in appropriate circumstances, with law enforcement.

### **What control measures are in place to support data security?**

- There are a wide range of control measures in place to protect the information held in the MSIN system and ensure that it is not misused.
- Stop the Traffik has gone through extensive IT security checks and improvements to ensure the system is secure.
- The database itself requires a login; 2 factor authentication can be put in place for access.
- MSIN members have to sign a Membership & Confidentiality Agreement and a Data Sharing Agreement, which sets out their obligations with regard to the information they access through MSIN membership.
- There is a requirement that no member takes action on information without first going through their usual due diligence processes.

## Structure of MSIN (Board, SAG and TAG):

### MSIN Board

- Responsible for the overall direction, supervision and management of the company.
- Consist of directors who are a representative of a MSIN members. Each MSIN member may only have 1 representative appointed to the Board at a time.

### SAG (Strategic Advisory Group)

- Responsible for offering strategic advice to the Board on the direction of MSIN and the best way to leverage the networks and resources of the MSIN members to achieve the objective of MSIN (to disrupt modern slavery and labour exploitation).
- Each MSIN member may only have 1 representative appointed to the SAG at a time.

### TAG (Technical Advisory Group)

- Responsible for offering technical advice and subject matter expertise to achieve the objective.
- Each MSIN member shall be entitled to a main TAG member, but can have other individuals present.

## What is expected from members?

- The Network is a community of trust and works on this basis.
- The success of MSIN depends on what members put in; all members are expected to contribute intelligence or information to the group.
- All members must be victim centric in their approach – that's a key guiding principle
- The Network is a safe haven and there are no commercial or other repercussions for businesses providing information.
- Information is used to drive the right behaviours and align with established protocols.
- The Network complies with GDPR and other legal provisions.
- Members must also pay their membership fees and participate in MSIN meetings and working groups where appropriate.
- There are legal documents to sign, including a Membership & Confidentiality Agreement and a Data Sharing Agreement, which sets out obligations.
- No member of the MSIN shall knowingly take any action directly or indirectly that would create a risk to the MSIN or any of its members based solely on information shared by another member of the MSIN without that first member carrying out its own due diligence on the Information.

## What is the criteria to become a member?

- Data compliance
  - Must be compliant with all relevant data protection regulations
- Financially capable
  - Must understand and be financially capable of discharging the requirements of the indemnity clause of the MSIN membership agreement and payment of fees.
- Modern Slavery Procedures

- Must have a published modern slavery statement fulfilling Home Office guidance, regardless of minimum turnover. Must have a written modern slavery procedure that manages cases in line with victim protection.
- Active Representation
  - Must have a nominated representative who can take leadership within MSIN and who can make decisions relating to potential modern slavery cases, such as attending monthly meetings.
- Active Intelligence Sharing
  - Expected to be an active contributor of intelligence

### **What is the indemnity clause?**

- New members are bound by confidentiality and competition- they should not act on information received without conducting their own due diligence.
- Each member has to sign a membership agreement, including the indemnity clause.
- The indemnity clause ensures the management of sensitive intelligence and data sharing on the MSIN database.
- Each member indemnifies the other members up to an amount not exceeding £5 million.
  - This is for protection against any breaches of the data sharing agreement.
  - This is unlikely to happen but members must be able to cover the clause.

### **Rationale of the indemnity clause:**

- This has been agreed upon after several rounds of discussions but if this is something you are unable to commit or would like more explanation we can put you in contact with our MSIN legal workstream to explain the rationale behind this clause further.

### **What is the membership fee?**

The membership fee is set by the board on an annual basis, and this is currently.

£500 Up to £5m turnover

£1,000 £5m to £10m turnover

£1,500 £10m to £25m turnover

£2,000 £25m to £40m turnover

£3,000 £40m+ turnover

Annual payment of these fees is in April.

### **What is the process of applying to be a member?**

- Completion of an MSIN Application Form
- Review/recommendation is made to the MSIN Board
- The application process is followed by an onboarding process for new members. The whole process from application to onboarding will take 2-3 months.
- Documents that members have to sign: Membership and Confidentiality Agreement, Data Sharing Agreement