

UNISON Slavery and Human Trafficking Statement 2018

1. Introduction

This is UNISON's third statement, made under section 54 of the Modern Slavery Act 2015 for the financial year ending 31st December 2018. It sets out the steps UNISON has taken to ensure that slavery and human trafficking are not taking place in either our core operations or our supply chains.

UNISON recognises the transparency in supply chains (TISC) requirement as a positive step in identifying and addressing the issues of modern slavery and human trafficking. To drive improvements and change we seek to collaborate and learn from others in this area.

This statement is an update on progress made since the union's last statement and sets out our future plans for continuous improvement.

2. UNISON's Structure, Business and Supply Chains

UNISON is the UK's biggest trade union representing and acting for 1.3 million fee paying members who work to provide a wide range of public services and utilities, whether they're employed by private companies, public authorities or in the community and voluntary sector. We represent members, negotiate and bargain on their behalf, campaign for better working conditions and pay, for public services and amongst other things, advocate for responsible business conduct in law and practice at home and abroad.

UNISON has over 1,200 employees and an annual turnover in excess of £36m. The union is organised nationally, regionally and at branch level. UNISON's head office is in London and there are 32 regional offices and over 800 branches. UNISON is a complex organisation with a wide range of third party suppliers.

Business operations

UNISON is governed by lay members who are elected annually by the membership to sit on the National Executive Committee (NEC). The NEC and its sub-committees guide our strategic direction and provide approval for strategic, business and annual work plans and large scale projects based on the policy motions set annually by our representative members at our National Delegate Conference. Each Service area (local government, health, higher education, police & justice, energy, education, water, environment & transport, community & voluntary) also have their own elected lay Service Group members who oversee their service group's work plan which set by the policy motions agreed by elected members to their annual service group conferences.

Supply chains

The union's third party supply chains include goods and services, mainly from providers based within the UK or EU, for the effective running of the organisation as well as the provision of affiliated services for our members. UNISON purchases a wide range of goods and services that include

legal services, IT hardware, services and software, furniture, stationery, electronics, travel services, printing, mailing, conference services, property and facilities services and catering. We recognise that modern slavery is usually hidden and that there are high risks of slavery linked to the global supply chains of the goods and services we procure.

3. UNISON Slavery and Human Trafficking Policies

UNISON is committed to ensuring there is no slavery or human trafficking within any part of its business or its supply chains. The union strives to achieve this through its recruitment policies and procedures and supplier due diligence processes. For our third party suppliers we aim to focus on high risk industries in this area and collaborate with others to concentrate our resources and increase our leverage with brands.

We are starting to use the Ethical Trade Initiative's (ETI) Due Diligence Framework to guide and influence our work in this area. UNISON has a Supplier Code of Conduct (updated in 2016) which sets out the Ethical Trade Initiative (ETI) Base Code as the minimum labour standards it expects from its suppliers as well as requiring compliance with the Modern Slavery Act.

ETI Base Code

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Policies

UNISON's international policy is determined by the National Delegate Conference (NDC) which supports workers in the global south to access their rights and campaign in support of public services and corporate accountability. UNISON works with international human rights and labour rights' groups, and offers support to international partners to challenge labour and human rights' violations in countries identified as priority countries through the union's policy.

UNISON is also affiliated to a number of relevant organisations including Electronics Watch, Anti-Slavery International, Banana Link, War on Want and Labour Behind the Label (part of the Clean Clothes Campaign).

UNISON naturally recognises that trade unions are essential to global efforts to tackle modern slavery by representing members and campaigning for decent work. The union provides

immigration advice to its members in the UK and organises migrant workers to provide support, assistance and create a network for members that may be more vulnerable to exploitation.

Public Services procure around £255 billion a year, a buying power starkly in contrast to our own. As the largest union, including the largest public service union in the UK, UNISON has started to work with our members to reform public service procurement policy and practice within their workplaces, to eradicate extreme exploitation and modern slavery:

- UNISON has recently developed a four year ethical procurement of public service goods strategy which takes a social partnership approach, that includes curriculum based learning and doing, to encourage its public services employers e.g. local authorities, NHS, education etc. to improve how they procure. Four high risk supply chains will be focused on; food, work wear, electronics and construction. Within these, based on the priorities of the Global Union Federations that represent workers making those goods, specific products will be targeted. We will encourage and support public service authorities to undertake specific supply chain due diligence and remedial action that goes beyond audit, on these products.
- UNISON has developed guidance and training to assist branch international officers to campaign for public service providers to develop ethical procurement policies, including through a best practice research report for local government. And is currently developing an activists learning resource on ethical procurement of public service goods that is complementary to the strategy.
- The union is supporting calls for the Transparency in Supply Chains requirement of the Modern Slavery Act to be extended to public services. And is taking part in the formation of a campaign calling for binding human rights due diligence national legislation.
- The union is supporting calls for an ILO convention on decent work in supply chains and Chairs/ coordinates the UK Civil Society Working Group in support of the United Nations binding treaty on transnational corporations.

Policies applying to UNISON recruitment and internal operations

UNISON employs solely within the UK. Our recruitment procedures ensure that all prospective employees are legally entitled to work in the UK. All successful applicants must produce on their first day, one of the following: their passport, their driving licence or their birth certificate (original documents only, no photocopies). In addition, in order to comply with the Asylum and Immigration Act 1996 requirements, evidence of the right to reside and work in the UK, including work permits and visas, is sought from all successful applicants and checked by HR. If UNISON is in the process of applying for a work permit for a prospective member of staff they cannot legally start work until it has been received.

UNISON recognizes and collectively bargains its staff wages and terms and conditions – including most policies, with three unions, UNITE, NUJ and its independent staff union the Society of Union Employees (SUE). UNISON is an accredited Living Wage Employer. Our Living Wage accreditation ensures all direct and indirect employees are paid at least the Living Wage. UNISON carries out reasonable and practical due diligence in the sourcing of goods and services.

4. UNISON due diligence procedures in relation to Slavery and Human Trafficking in its business and supply chains

UNISON understands that its largest exposure to modern slavery and human trafficking will come from its third party supply chains.

The union's supplier vetting process requests information from potential suppliers to assess their suitability as a supplier and provide evidence of their compliance of labour standards, the Modern Slavery Act and the Asylum and Immigration Act, as well as covering other areas of company information, policies and procedures. This enables the procurement team to identify and assess any potential risks. We are beginning to use the Ethical Trade Initiatives Due Diligence Framework to inform our processes.

Risk assessment procedures

Key suppliers are expected to share the same values as UNISON and declare their compliance with UNISON's Supplier Code of Conduct, which includes the Ethical Trade Initiative (ETI) Base Code as minimum labour standards.

UNISON does not permit its key suppliers to subcontract work except where prior permission has been obtained.

As contracts are renewed with key suppliers we ensure that Modern Slavery Act requirements are included within the terms and conditions of contract.

UNISON's terms and conditions of purchase include a clause confirming UNISON's commitment to ensuring slavery and human trafficking is not taking place. UNISON reserves the right to terminate its contracts if the supplier breaches the clause and slavery or human trafficking is found.

5. Key risks and steps taken

UNISON is committed to better understanding its third party supply chains. We have written to our key suppliers and requested that they complete a supply chain questionnaire to provide transparency and greater understanding in this area. This is assisting our work in reviewing our existing suppliers for any risks and profiling our top 100 suppliers (by annual spend), by reviewing their industry sector, location and labour practices. Whilst we recognise the flaws of self-assessments, they go some way to help us ensure that procurement resources can be focused on higher risk suppliers/categories to drive improvements in these sectors.

Since affiliation in 2017, UNISON remains the only trade union and only private organisation to affiliate to Electronics Watch, a monitoring and advocacy body for public authorities that buy

electronic equipment. UNISON recognises the electronics industry as a high risk area for labour and human rights abuses and by affiliating to Electronics Watch the union will work alongside public sector buyers to increase leverage on manufacturers and brands to drive improvements.

6. Training and capacity building about Slavery and Human Trafficking

UNISON's central procurement team have all been trained in procurement ethics, including the issues of modern slavery and human trafficking and briefed on the requirements of the Modern Slavery Act.

Information has been circulated to all staff to raise general organisational awareness.

All Procurement staff will take the CIPS Ethical Procurement and Supply e-learning and online test annually.

7. Effectiveness in ensuring that slavery and human trafficking is not taking place in the business or supply chains, measured against appropriate KPIs: UNISON's action plan

Like many organisations UNISON's third party supply chains are complex. Our priority and focus continues to be on understanding our supply chains, identifying areas of greater risk and vulnerability of workers and influencing where possible. We have high aspirations but limited resources and so our aim is to focus where we are able to make a difference. We will continue to engage with our third party suppliers, continue advocacy and campaign work for improvements and seek to collaborate and learn from others.

We aim to continue to develop and build performance measurements that will support continuous improvement. After the first three years, previous KPIs have been revisited and updated and new KPIs included. The table below tracks the past KPIs and actions and looks forward to our commitments in 2019.

Risk	KPI	Action	Timeframe
Procurement staff are unaware of risks of modern slavery	All Procurement team to be trained in ethics and Modern Slavery risks	Procurement team ethical procurement training. Annual refresher training including UNISON's wider strategy. All MCIPS professionals complete CIPS Ethical Procurement training annually.	Completed 2015/2016 Refresher 2019
UNISON's procurement policy is out of date and unable to provide relevant direction	Policy to be reviewed in line with new legislation and reviewed regularly to ensure up-to-date.	Procurement policy reviewed and updated	Completed 2016 Review 2019
Supplier Code of Conduct is out of date and not mainstreamed into procedures	Revised Supplier Code of Conduct in place	Supplier Code of Conduct reviewed, updated and better embedded in procurement processes	Completed 2016 Review 2019
Supplier questionnaire does not include due diligence questions on modern slavery and risks cannot be identified	Questionnaire reviewed and revised and operational in new procurements.	Supplier Questionnaire updated to include Modern Slavery due diligence	Completed 2016 Review 2019
Staff are unaware of UNISON's and their responsibilities	Information circulated to staff to raise awareness	Information circulated to staff	Completed 2016 Repeat 2019
UNISON contract terms and conditions fail to incorporate modern slavery obligations	Terms reviewed, updated and incorporated into new contracts and as contracts reviewed.	UNISON terms and conditions updated to incorporate clause regarding Modern Slavery Act Compliance	Completed 2016 Review 2019

Risk	KPI	Action	Timeframe
NGOs trying to advocate for better due diligence legislation do not gain enough support		UNISON signed Anti-Slavery Charter	2017
Electronics industry is a powerful high risk industry infamous for modern slavery from mining to factories and more	Electronics Watch requirements incorporated into new contracts for IT hardware. Knowledge and capacity of suppliers increases.	UNISON affiliation to Electronics Watch. UNISON builds supportive relationships with suppliers	Affiliated 2017 2019 operational
Suppliers are unaware of UNISON's and their obligations on modern slavery	Information sent to suppliers. Issues and risks discussed with current and new suppliers.	Key suppliers written to regarding Modern Slavery Act, UNISON's Supplier Code of Conduct and supply chain questionnaire requested to be completed. Dialogue with suppliers on issues and risks.	2017 Ongoing
UNISON is unaware of similar activities by other trade unions		Attended exploratory meetings with the TUC and other trade unions to share best practice, learning and possible areas for future collaboration	2017 Ongoing
Top suppliers not risk assessed, so no ability to identify or prioritise most at risk suppliers	Assessment complete and increased knowledge and focus of resources on key risk areas. Completed assessment will drive decision making on high risk areas.	Risk profile top 100 Suppliers. Use ETI framework to guide risk profiling	Started 2017 and will continue in 2018/ 2019

Risk	KPI	Action	Timeframe
No framework to follow for due diligence process	Due Diligence framework in place to monitor suppliers	Use ETI Due Diligence Framework to manage labour rights risks within third party supply chains.	Started 2018 and will be continual process.
HR unaware of risk of modern slavery	HR staff aware and plan of action in place	Staff provided with briefing information and new staff informed.	2019
Whole union approach and response to modern slavery is not taken	Modern Slavery Advisory Group established	Advisory group including representatives from Procurement, International, HR, trade union rep (agreed by joint national trade union body) and other stakeholders as relevant, established to discuss progress, share relevant information and agree next steps.	2019

Review and approval

UNISON's Slavery and human trafficking statement is reviewed and published annually. This statement has been developed in consultation with internal representatives from different departments and informal consultation with a senior UNISON internal trade union rep.

This statement has been approved by the union's Finance and Resource Management Committee.



Josie Bird, Chair of Finance and Resource Management Committee (NEC member)