

UNISON Slavery and Human Trafficking Statement 2019



Introduction

This is UNISON's fourth statement, made under section 54 of the Modern Slavery Act 2015 for the financial year ending 31st December 2019.

This statement provides an update on progress made since our last statement and sets out our planned actions to continue to ensure that slavery and human trafficking are not taking place in either our core operations or our supply chains.

1 UNISON's structure, business and supply chains

UNISON is the UK's largest 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. UNISON has over 1,200 employees and an annual turnover in excess of £36m.

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's Structure

The union is organised nationally, regionally and at branch level. Policy can be developed at national, regional or branch level, by service groups or by self-organised groups, each within their own 'sphere of influence', providing it complies with UNISON's rules. The union's head office is in London and there are 32 regional offices and over 800 branches. UNISON branches are made up of elected volunteers that represent members within that branch.

UNISON is governed by lay members who are elected every two years 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 group (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 is 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, IT 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.

UNISON's percentage of directly employed staff on permanent contracts is 91%. Due to the union's structure, there is a mixture of centralised and decentralised procurement. The responsibility for the majority of budgets and contracts is devolved to regional offices and departments but some are managed centrally. We are focussing resources on categories where risks are highest and working on improving the supplier data we collect centrally. We are also beginning to delve more deeply beyond Tier One within our electronics purchasing.

Review and approval

UNISON's Slavery and human trafficking statements apply to the calendar year January 1st – December 31st. It is reviewed and published annually each April. This year we established an internal modern slavery advisory group comprised of representatives from procurement, international, human resources and a staff trade union representative (agreed by joint national trade union body). This statement has therefore been developed in consultation with the modern slavery advisory group.

UNISON's Finance and Resource Management Committee (FRMC) is tasked with reviewing annual progress and agreeing new KPI's but apart from this year due to organisational disruptions caused by the Covid 19 pandemic, the International Committee is also normally informally consulted. The Chair of the FRMC signs UNISON's Modern Slavery Statement.

2. UNISON Slavery and Human Trafficking Policies

UNISON is committed to ensuring no slavery or human trafficking exists 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 our priority is to focus on high risk industries and categories and collaborate strategically with others to concentrate our resources and increase our leverage with brands.

To help us focus on the most salient modern slavery risks within our supply chains, we are using the Ethical Trade Initiative's (ETI) Due Diligence Framework to guide and influence our work.

UNISON has a Supplier Code of Conduct (Appendix A) which sets out the Ethical Trade Initiative (ETI) Base Code as the minimum labour standards expected for its suppliers to be meeting or working towards, as well as requiring compliance with the Modern Slavery Act. This year we reviewed and updated our Supplier Code of Conduct.

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

Procurement Policy

UNISON's internal Procurement Policy was reviewed and updated this year and contains additional modern slavery commitments to meet the requirements of the Modern Slavery Act. Our suppliers' human resource policies and practices are assessed throughout the procurement process by a supplier questionnaire and at times during tender interviews and supplier visits as appropriate.

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. This enables UNISON to work 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, or countries strategic to our international business and human rights strategy.

We are affiliated to a number of relevant organisations including Electronics Watch, Core Coalition, 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. We provide immigration advice to members in the UK and organise migrant workers to provide support, assistance and create a network for members that may be more vulnerable to exploitation.

Public Services procure around £260 billion a year, an enormous buying power contrasted to our own. As the largest union, including the largest public service union in the UK, UNISON is working with our members to reform public service procurement policy and practice within their workplaces, to eradicate extreme exploitation and modern slavery through:

- An ethical procurement of public service goods strategy that includes a learning by doing tripartite training programme, to encourage public services employers e.g. local authorities, NHS, education etc. to improve how they procure. Three high risk supply chains have been targeted for in depth work: food, work wear and electronics. Working to the priorities of the relevant global union federations, we will work to encourage and support public service authorities to undertake specific beyond audit supply chain due diligence action 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 this includes a practice research report for local government and there are plans to develop further branch learning resources.
- The union continues to support calls for the Transparency in Supply Chains requirement of the Modern Slavery Act to be extended to public services. And has taken part in the articulation of a new campaign for a corporate duty to prevent adverse human rights and environmental impacts. Unlike other such legal proposals around Europe, UNISON has successfully succeeded in ensuring the UK campaign proposal includes the public sector in its scope.
- 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 their right to work documentation in line with the Right to Work Checklist published by the Home Office. This is a condition of employment and staff are not contracted until this has been produced and subsequently checked and verified by HR. This includes work permits and visas. 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.

3. Risk assessment, prevention and mitigation

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 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 continually review our vetting procedures and information provided by our suppliers. We are using the Ethical Trade Initiatives Due Diligence Framework to inform our processes to ensure focus is on suppliers from high risk categories and industries.

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 working towards the Ethical Trading Initiative (ETI) Base Code. 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. The terms and conditions of purchase include a clause confirming UNISON's commitment to ensuring slavery and human trafficking is not taking place. The union reserves the right to terminate its contracts if the supplier breaches the clause and slavery or human trafficking is found.

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

As a trade union, UNISON takes all labour rights violations as defined by the International Labour Organisation seriously. Whilst this statement is written for the purposes of the Modern Slavery Act, our practices and policies apply to all workers, as slavery can only exist in and absence of other labour rights and in particular Freedom of Association and Collective Bargaining. How we plan to manage and mitigate priority risks is written in the point above.

UNISON periodically takes part in the ETI's modern slavery meetings and is a pro-active member of the CORE Coalition contributing towards defining a new law to prevent human rights and environmental abuses. When relevant, we call upon these groups, as well as Anti-Slavery International and Focus on Labour Exploitation for advice.

5. Training and capacity building on Slavery and Human Trafficking

All procurement staff are required to annually undertake and pass the CIPS Ethical Procurement and Supply e-learning and online test. For MCIPs Chartered staff this is a requirement to maintain their chartered status, but all procurement staff are required to complete this as a minimum.

We recognise the importance of a joined-up approach to addressing modern slavery issues across the union. The establishment of an internal modern slavery advisory group will assist with coordination and in the coming year we will work to consolidate and the strengthen group, which has collectively agreed this statement.

This year we took steps to increase awareness of modern slavery issues specifically for our Human Resources department by carrying out awareness training so that we can focus on building modern slavery into our HR policies and procedures. We are looking at mapping what agency staff have been used to decide on action that can be taken, holding a webinar for budget holders to highlight our modern slavery commitments and to provide additional advice and support for any concerns that might arise.

6. Effectiveness, measured against appropriate KPIs

UNISON's business model is designed to seek to represent all our members wherever they work and whatever they do and campaign for the services they provide. Full objectives can be found in Appendix B. Therefore, gaining value for money, including on price is, like with all organisations, an important factor in how we operate. However, in line with our Procurement Policy, contract award decisions are not just based on price but include other relevant evaluation criteria.

UNISON is committed to better understanding its third-party supply chains.

We are continuing our work to review our existing suppliers for any risks. This year we established an internal modern slavery advisory group. After an initial induction period, amongst other things, the group reviewed policies and agreed a framework for prioritising higher risk categories and suppliers. There has also been a continued focus on our top 100 suppliers (by annual spend), with the aim of driving improvements in these sectors.

Through affiliation to Electronics Watch, during our whole organisation electronic refresh procurement process, we inserted specific labour rights terms and conditions into our suppliers' contracts and have begun to work proactively with them to gain supply chain transparency as per those clauses. We intend to continuously utilise the Electronics Watch model to work with our suppliers and manufacturers to drive improvements.

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 can make a difference. We will continue to engage with our third-party suppliers and to advocate and campaign for the strengthening of the national regulatory environment and its resourcing and seek to collaborate and learn from others.

We aim to further develop our performance measurements to support continuous improvement.

The table below tracks the past KPIs and actions and looks forward to our commitments in 2020.

UNISON's Modern Slavery KPI Tracker

Risk	KPI 2019	Action taken 2019	Timeframe	KPI 2020
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 2019	Procurement policy remains up to date
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 2019	Supplier Code of Conduct is up to date
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 2019 Review 2020	Framework and guidance exists for assessing suppliers of low value but high risk services
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 2020	Ongoing
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	Improved processes and guidance in place and plan to roll out exists
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 Ongoing	A plan of action exists on high risk categories and assessment for where resources are best targeted is made.

UNISON's Modern Slavery KPI Tracker

Risk	KPI 2019	Action taken 2019	Timeframe	KPI 2020
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 on UNISON's wider strategy. All MCIPS professionals complete CIPS annual ethical procurement training	Completed initially in 2015/16 Further action 2019	Procurement team possesses up to date knowledge and skills and procedures are followed
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.	Completed 2019	MS mainstreamed into HR practice
Staff are unaware of UNISON's and their responsibilities	Information circulated to staff to raise awareness	Information circulated to staff	Completed 2016 Review 2020	A communication strategy exists and implementation is underway
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	
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	Maintained affiliation to Electronics Watch. Built supportive relationships with suppliers, especially mobile phone. Supported by UNISON mobile phone supplier did as much as reasonably possible to gain transparency of supply chain including joint discussions with brands. Partial transparency achieved for mobile phones.	Affiliated 2017 2019 operational 2020 ongoing	IT suppliers gain transparency of UNISON's supply chain from brands. Situation for workers in UNISON mobile phone or IT supply chain is improved or the process to gain improvement improves, should any evidence of abuse come to light through Electronics Watch monitoring partners.

UNISON's Modern Slavery KPI Tracker

Risk	KPI 2019	Action taken 2019	Timeframe	KPI 2020
Whole union approach and response to modern slavery is not taken	Modern Slavery Advisory Group established and agrees action plan and priorities for addressing salient risks.	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.	Group established 2019 2020	Review of the capacity of the Modern Slavery Advisory Group and resources available leads to action plan to increase progress
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	
NGOs trying to advocate for better due diligence legislation do not gain enough support		UNISON signed Anti-Slavery Charter	2017	

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



Alastair Long, Chair of Finance and Resource Management Committee (NEC member)

Appendix A UNISON's supplier code of conduct

UNISON actively promotes the adoption of good labour standards, worker rights, equal opportunities and considers occupational health and safety a priority. Products and services must be produced and supplied under safe working conditions that do not involve abuse or exploitation of persons and in a manner that promotes sustainable practices and protects the environment.

UNISON seeks to work with suppliers that share the same values and standards for workers. As a minimum, UNISON seeks to engage suppliers that comply with all relevant legislation, including adherence to the Modern Slavery Act and have sound employment and working practices, including health and safety and environmental record.

UNISON is an accredited Living Wage Employer and seeks to work with organisations that pay a minimum of the Living Wage. UNISON will not work with suppliers (or their sub-contractors) that unlawfully discriminate against employees, or suppliers that prevent or discourage employees from joining trade unions.

UNISON expects its Suppliers to actively work towards applying the labour standards set out under the Ethical Trade Initiative (ETI) Base Code. This should include any sub-contractors. Suppliers should also have ethical audits carried out to demonstrate their commitment and identify any risks in this area. Suppliers must be able to demonstrate any corrective action/measures taken in the event of any non-compliance.

Suppliers are expected to have or be working towards having policies or statements on the following:

- Health and safety
- Environmental management (or sustainable practices/corporate social responsibility)
- Quality
- Employee policy and procedures including (but not limited to) training and development, apprenticeships, disciplinary, grievance and appeal, bullying and harassment.
- Equal Opportunities
- Trade Union recognition and staff consultation
- Transparency in supply chains (TISC) statement (as required by the Modern Slavery Act 2015) or other policy/statements in this area if not covered by the Act
- Business Continuity Planning
- Anti-corruption and anti-bribery
- Ensuring as far as is practicable, the eradication of the use of conflict minerals
- Data protection and security standards (if applicable)

UNISON reserves the right to exclude any suppliers from procurement processes if it is found that the organisation:

1. Is bankrupt or is the subject of insolvency or winding-up proceedings
2. Is in breach of legislation, such as labour, health and safety, environmental, social or data protection

3. Is found to have overstated achievements under their Modern Slavery Transparency Statement or on other publicly available material
4. Has attempted to unduly influence the decision making process,
5. Has negligently provided misleading information, withheld information or is not able to submit supporting information
6. Has entered into agreements with other organisations aimed at distorting competition

As well as requesting details of such policies and statements UNISON will request information on employment practices and may wish to test the information provided. Depending on the contract this may involve UNISON personnel speaking to employees and other clients and visiting supplier/client premises to test and validate information provided.

UNISON's suppliers must declare any relationship with UNISON staff that could be a potential conflict of interest.

We expect suppliers to maintain ethical controls over their business activity which ensures no risk of bribery or corruption within their personnel and their supply chain.

Suppliers must protect all sensitive information, including confidential, proprietary and personal information. Information should not be used for any purposes beyond the scope of the business arrangement.

UNISON's suppliers are required to comply with this Code of Conduct.

Last Revised: January 2020

Declaration of Supplier's Acceptance of UNISON's Supplier Code of Conduct

Compliance to UNISON's Supplier Code of Conduct is an essential prerequisite to becoming a supplier to UNISON.

On behalf of the supplier I confirm that:

1. We have received and read UNISON's Supplier Code of Conduct (version 2020) and in addition to our obligations under any contract(s) with UNISON we confirm our full compliance with the principles and requirements of the Supplier Code of Conduct.
2. We will effectively communicate the requirements of the Supplier Code of Conduct with our employees, agents and subcontractors as appropriate to ensure all requirements are implemented.
3. UNISON may request information and carry out visits/inspections of our facilities to ensure that all requirements are implemented accordingly and may ask for reconfirmation of compliance with the Supplier Code of Conduct when entering into a contract with UNISON.

I hereby certify that I am an authorised representative (delegated or otherwise) of the supplier and I am permitted to make these undertakings on behalf of the supplier.

Signed:

Full name and position in Company:

on behalf of (Name of Company):

Address:

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Postcode

Telephone Number:

Date:

Please return this declaration to:
Procurement Team, UNISON Centre, 130 Euston Road, London, NW1 2AY.
Email: purchasing@unison.co.uk

Appendix B UNISON objectives 2019

UNISON, the biggest growing union's main priority for 2019 will be to campaign for additional funding across all public services, and to fight the challenges posed by the restrictions brought about by the Trade Union Act and the European Union exit negotiations.

Our key Objectives are to:

- Enhance our capability to meet the recruiting and retaining of members, along with the organisational and representational challenges the union is faced with. Ensuring the union is relevant to all members who provide public services – including those who work in the community and private sector. To identify and develop leadership from across the union membership particularly among young members. To enhance our democracy by increasing and widening participation amongst our activists and members.
- To deliver increased funding for public services to ensure we can protect and secure real terms increase to pay and terms and conditions and high quality employment and pensions for our UNISON members. Build confidence for industrial action when required and identify and support strategic industrial disputes at national and branch level and seek to co-ordinate such action wherever possible. Promote equal pay and equality and challenge all forms of discrimination and provide support to migrant workers. Promote UNISON's alternative economic strategy.
- Develop our public service campaigns in support of quality public services, in defence of the NHS, Education, Local Government, Social Care, Police, Probation and all public services, building our political influence, forging alliances with unions, appropriate campaigning and community groups to challenge the austerity programme, including challenging the attacks on the welfare state. To campaign for the election of governments in Westminster, and the devolved nations, and councils which value public services and working people, rejecting the arguments of the Tory government and all far right parties. To promote the new Political Fund arrangements. To promote the union's International work. To promote 2019 UNISON and TUC 'Year of the Young Worker'.
- Ensure that the union's structures including organisational, lay member, ICT infrastructure, digital and internal management systems and the distribution of our resources are accessible, efficient and effective to meet the changing needs of all sections of the union and its members.