

# UNISON Slavery and Human Trafficking Statement 2022



## Introduction

This statement is made under section 54 of the Modern Slavery Act 2015 and constitutes UNISON's slavery and human trafficking statement for the financial year beginning 1st January 2022 and ending 31st December 2022.

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 approximately 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 among 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. There are 29 regional offices and premises, 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 Council (NEC). The NEC and its sub-committees guide our strategic direction and provide approval for 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 has its 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 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 97% and is working towards reducing the use of agencies by appointing staff directly on Fixed Term Contracts. 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 continuing to focus resources on categories where we have identified that the 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 statement applies to the calendar year January 1st – December 31st. It is reviewed and published annually each April. UNISON has 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). The key purpose of this working group is to set key performance indicators and assess progress made against these, to drive and monitor continuous improvement in the union's practices in this area. This statement has therefore been developed in consultation with the union's modern slavery advisory group.

UNISON's Finance and Resource Management Committee (FRMC) is tasked with reviewing annual progress and agreeing new KPIs. The International Committee is also informally consulted on progress. 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 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 leverage with brands.

To help us focus on the most salient modern slavery risks within our supply chains, we have developed a Supplier Due Diligence Framework to guide our work to assess the

risks associated with a particular service or product and then undertake appropriate and effective supplier due diligence and seek supply chain transparency.

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 meet or work towards, 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 practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

### Procurement Policy

UNISON's internal Procurement Policy contains modern slavery commitments to meet the requirements of the Modern Slavery Act. Our Procurement Policy and Supplier Code of Conduct are reviewed on an annual basis. For contracts at high risk of modern slavery, our suppliers' human resource policies and practices are assessed throughout the procurement process by a supplier questionnaire and 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.

UK Public Services procure around £280 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: solar panels, 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 practical research report for local government, a local government guide to sourcing solar panels not made by Uyghur forced labour, a world-leading guide for UNISON members on Pride committees on LGBT+ rights in global supply chains 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 Business, Human Rights and Environment Act, a human rights due diligence regulation to hold businesses and the public sector accountable should they cause harm. UNISON is developing policy for how the public sector should be treated within the Act.
- The union is supporting calls for an ILO convention on decent work in supply chains and is at the heart of a coalition calling for a new Business, Human Rights and Environment Act in the UK, a mandatory human rights due diligence law which would capture UNISON in scope.

### Policies applying to UNISON recruitment and internal operations

UNISON employs solely within the UK. Our recruitment procedures ensure 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.

An elected Staff Negotiations Committee is in place for its own operations, which follows a Terms of Reference and Constitution for negotiation, consultation and information purposes around pay, terms and conditions and health and safety.

UNISON recognises 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 real Living Wage Employer. Our real Living Wage Foundation 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 due diligence 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 and budget holders to identify and assess any potential risks. We continually review our vetting procedures and information provided by our suppliers. We have developed a Supplier Due Diligence Framework to ensure focus is on suppliers from high-risk categories and industries.

#### Risk assessment procedures

We seek Key suppliers that share similar 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.

When relevant, we call upon various civil society partners for advice.

## 5. Training and capacity building on Slavery and Human Trafficking

The procurement team are all required to undertake and pass the CIPS Ethical Procurement and Supply e-learning and online test on an annual basis.

Modern slavery awareness is included within our staff induction booklet as well as staff induction training, to engage with all new staff on modern slavery issues from the outset of their employment at UNISON.

We recognise the importance of a joined-up approach to addressing modern slavery issues across the union. The establishment of the internal modern slavery advisory group has assisted with the coordination of issues. The group strives to ensure continuous improvement and collectively agrees this statement.

Our Human Resources department has participated in awareness training so that we can focus on building modern slavery into our HR policies and procedures. We are continuing to look at mapping what agency staff have been used to decide on action that can be taken.

This year modern slavery and ethical procurement training was targeted at regional staff involved in buying decisions and managing facilities management suppliers. 5 webinar training sessions were held with 47 staff. This training has helped to increase staff understanding of the issues, covered our risk-based Supplier Due Diligence Framework, the importance of supplier management, and information on where staff can obtain further guidance and support.

## 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. 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 based only on price but include other relevant evaluation criteria.

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

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 2023.



## UNISON's Modern Slavery KPI Tracker

Risk	KPI 2022	Action taken 2022	KPI 2023
<b>1. UNISON's:</b> A) procurement policy B) supplier code of conduct and C) supplier questionnaires become out of date.	Procurement Policy to remain up to date – annual review process.	Bi-annual review completed January 2022 with some changes.  Policies, codes and questionnaires placed in prominent position on Pearl, the new staff intranet.	1. Plans made for annual review of a) policy b) supplier code of conduct and C) biennial review of supplier due diligence questionnaires – to be next reviewed in 2024.
<b>2. UNISON contract terms and conditions fail to update modern slavery obligations.</b>	None required - biennial review carried out in 2021.	New standardised template for Facilities Management contracts implemented as contracts come up for renewal.	a) Biennial review process for contract terms template.  b) As contracts come up for renewal, ensure that they include UNISON terms concerning Modern Slavery obligations.
<b>3. UNISON's Due diligence framework and process does not pick up issues and/or no remediation action is taken.</b>	Embed risk-based supplier due diligence framework into practice with all contracts managed by the procurement team.	For contracts managed by procurement, the 2022 Full Supplier Questionnaire and 2022 Supplier Code of Conduct was issued.  MS training covered the due diligence framework carried out with 47 staff across all regions with responsibility for buying.	a) Consider which on and offline tools could be used to improve data management.  b) Potential missed issues from 2022 supplier questionnaires to be reviewed by the MS Advisory Group for effectiveness and any issues are begun to be remediated.

## UNISON's Modern Slavery KPI Tracker

Risk	KPI 2022	Action taken 2022	KPI 2023
<b>4.</b> Procurement staff do not have the skills and knowledge of Modern Slavery indicators to carry out due diligence.	Procurement team to continue to possess up to date knowledge and skills by carrying out annual CIPS ethical procurement training and also understanding of UNISON's strategy and procedures. Refresher training to be carried out.	Procurement team members undertook CIPS Ethical Procurement and Supply eLearning and Test.  Refresher training not undertaken.	Procurement team to continue to possess up to date knowledge and skills by carrying out annual CIPS ethical procurement training.  Plan for improving systems for implementing framework effectively and efficiently further developed.
<b>5.</b> HR unaware of risk of modern slavery and/or does not have the resources to track practices across the organisation.	MS mainstreamed into HR practice - HR staff to engage with regions and departments to seek a list of indirectly contracted staff to check the terms and conditions of agency workers.	No action taken.	a) HR to review the possibility of how to reduce the use of agency workers across the organisation.  b) Explore writing a protocol that staff/HR must follow when the union engages agency workers.  c) Explore reviewing job descriptions to ensure MS responsibilities are communicated well in the overall document when newly created or existing roles are advertised and filled.

## UNISON's Modern Slavery KPI Tracker

Risk	KPI 2022	Action taken 2022	KPI 2023
<b>6.</b> Non-procurement staff who are contract owners don't have MS training or enough knowledge of UNISON's supplier performance management procedures. And therefore, are unable to follow procedures or have impactful leverage to influence the unions top (spend and risk) seven suppliers.	Build supplier modern slavery awareness into contract management procedures.	Modern Slavery Awareness has been built into supplier performance management procedures. Staff with responsibility for FM contracts have received MS training.	Staff are aware of their contract management responsibilities. A plan to enable them to implement the framework effectively and efficiently is developed, including training and systems.
<b>7.</b> Unable to use opportunity that affiliation to Electronics Watch offers to contribute to elimination and remediation of forced labour practices.	Continue to gain transparency of UNISON's supply chain from brands.	No action taken.	Review of purchasing trends and discussion with Electronics Watch leads to development of new plan.

## UNISON's Modern Slavery KPI Tracker

Risk	KPI 2022	Action taken 2022	KPI 2023
<p><b>8.</b> Whole union approach and response to modern slavery is not taken.</p> <p>Additionally, staff turnover means they are unaware of UNISON's and their responsibilities and/or meaningful follow up work does not take place.</p>	<p>Review of the capacity of the Modern Slavery Advisory Group and resources available to lead action plan to increase progress.</p>		<p>a. Consider awareness raising initiatives to support and enable colleagues understanding of what Modern Slavery is and what they can do to help UNISON fulfil our obligation to reduce the risk of Modern Slavery</p> <p>b. Benchmarking UNISON's progress against other similar organisations drives the development of an organisational development pilot project with the aim of increasing impact.</p>

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



**Daniel Sartin**, Chair of Finance and Resource Management Committee (NEC member)



## Appendix A

### UNISON'S supplier code of conduct (v.2022)

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 – including prevention and discipline processes for discrimination against marginalised groups, such as LGBT+ workers and Black workers.
- 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 – including block listing of trade unionists, 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.

# 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 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.....

..... Postcode.....

Telephone Number.....

Date.....

Please return this declaration to:  
Procurement Team, UNISON Centre, 130 Euston Road, London, NW1 2AY.

Email: **procurement@unison.co.uk**