



Gangmasters &  
Labour Abuse Authority

**stronger  
together**  
tackling modern slavery in supply chains

## Retailer Protocol for Handling Reported Cases of Modern Slavery in the UK Supply Chain Advisory Document

### 1. Purpose and Use

- 1.1. This document establishes principles of good practice and a procedural protocol for retailers in responding to reported cases of forced labour, human trafficking, debt bondage and other forms of modern slavery in their UK supply chain.
- 1.2. The purpose of this protocol is to drive consistent application of good practice in the processes that retailers apply in handling reported cases of modern slavery that occur in their UK supply chain. It establishes a mechanism to incorporate lessons learnt from actual identified cases to develop this good practice and to establish similar processes in other country supply chains.
- 1.3. The status of this document is advisory. BRC recommends that its members and other brands and retailers adopt the principles. BRC invites retailer members to commit to adopting these principles.
- 1.4. The UK supply chain refers to goods for resale and not for resale suppliers, logistics and distribution companies, service providers, contractors, and labour providers at all levels of the supply chain (collectively referred to as 'suppliers'). Relevant retailers, as referred, are those retailers supplied by the particular supplier.
- 1.5. The [BRC](#), [Gangmasters and Labour Abuse Authority](#) (the GLAA) and [Stronger Together](#) have jointly prepared these principles and protocol in collaboration with retailer and supply chain representatives and welcome comment and input to further refine and improve this good practice guidance. BRC will review this guidance at least annually as part of the [BRC Better Retail Better World](#) programme and [GLAA Supplier/Retailer Protocol](#) engagement.

### 2. Principles

- 2.1. Retailers will recommend that their UK supply chain businesses attain an understanding of how modern slavery occurs in supply chains and an awareness of the indicators of forced labour<sup>1</sup>. Suppliers should also build internal capacity and implement good practice through a due diligence approach to detect, deter and deal with this hidden form of worker exploitation. Retailers will encourage their suppliers to utilise the resources of the GLAA, Ethical Trading Initiative, Stronger Together, trade associations and other training and awareness initiatives to comply with the requirements of the Modern Slavery Act and GLAA licensing standards
  - 2.2. Retailers recognise that those who become victims of modern slavery are made vulnerable to exploitation and abuse as a result of poor business practices or through criminal gangs. Individuals may also attempt to place victims into legitimate supply chains and businesses for the purposes of exploitation through forced labour, control of their bank accounts and/or withholding of personal documents.
  - 2.3. Retailers will promote to their UK supply chain that where indicators of modern slavery are identified within their business or elsewhere, suppliers should report this to the GLAA via
-



Gangmasters &  
Labour Abuse Authority

**stronger  
together**  
tackling modern slavery in supply chains

<http://www.gla.gov.uk/contact-us/> and/or [Modern Slavery Helpline](#) at the earliest possible stage, for advice on next steps.

- 2.4. Retailers recognise that the safety of the individuals is the first priority. Retailers accept that for suppliers to better protect the safety of individuals and not prejudice inquiries and potential prosecutions, their supply chain will maintain confidentiality over all information relating to the incident until advised by the appropriate authority.
- 2.5. Retailers will only expect their supply chain to inform them about a potential case of modern slavery within their business once authorised to do so by the appropriate UK authority such as the police or GLAA. Suppliers should actively seek approval from the relevant authority to inform their customers about a potential incident.
- 2.6. Where a supplier has alerted their customers; is cooperating with authorities; is actively implementing corrective actions and is not found to be complicit, retailers commit that there will be no standard policy to immediately delist or suspend trade with that supplier because of that specific reason. Instead investigation will take place alongside engagement with the supplier to assess next steps that need to be taken. Retailers will ensure internal coordination to ensure consistency of message and action between all departments such as ethical trade, procurement/buying, legal, PR etc.<sup>2</sup>
- 2.7. If a supplier has not, or is not cooperating with authorities, is failing to implement required corrective actions, or is found to be complicit in the offence, the GLAA will contact the retailers to advise them of the situation. The retailers may then individually decide to take appropriate commercial actions including suspending trade or delisting the supplier.
- 2.8. Suppliers will be encouraged to develop Standard Operating Procedures and Incident Control Procedures for reporting occurrences of modern slavery within their business<sup>3</sup>.
- 2.9. Retailers accept that the GLAA will not exceed its own legal powers or act unlawfully and that it will manage its communications in accordance with its [External Communications Policy](#) and the [GLAA Supplier/Retailer Protocol](#).

### 3. Procedural Protocol

- 3.1. The GLAA will, on request from the supplier within whose business the matter has occurred, issue to that business an email stating that it may now report that matter to its retailer and/or supplier clients. This will include a statement, where appropriate (i.e. unless the company is under investigation for the offence), that the supplier is cooperating fully with the appropriate authorities. If the supplier has been identified as uncooperative the action in 2.7 will be taken instead.
- 3.2. The supplier will determine how it wishes to communicate the matter to its retailer and/or supplier clients. This may vary depending on the facts of the case, but the recommended approach is a single email to all clients to ensure consistency of message and timing. This email should include a summary of facts with the timeline of events as may be released by the supplier.

---

<sup>2</sup> BRC foresees no competition law issues with this Protocol, however it is the responsibility of each individual company to determine its own legal risk.

<sup>3</sup> Further advice can be found in the Stronger Together [Tackling Modern Slavery in UK Businesses Toolkit](#)



Gangmasters &  
Labour Abuse Authority

**stronger  
together**  
tackling modern slavery in supply chains

- 3.3. Following receipt of this email, relevant retailers will aim to collaborate in their response rather than pursuing individual and duplicating activity. Such collaboration may be facilitated by an agreed third party. Alternatively, the relevant retailers will agree and appoint a 'lead retailer' to be the key coordinating point of contact with the supplier, assuming the supplier is willing to disclose its customers.
- 3.4. The objective of collaboration is to reduce duplication of activity and unnecessary burden for the supplier and retailers; promote good practice and efficiency in resolution of issues; provide confidence and assurance, or otherwise, to all relevant retailers that the supplier has the matter in hand.
- 3.5. The supplier should organise calls at the earliest convenience with its representatives, marketing agencies, labour provider (where appropriate), relevant retailers, and GLAA (subject to resources). The supplier may consider joint conference calls to ensure consistency of the information it provides to other organisations. Such calls to include:
  - 3.5.1. Recount of facts and timeline
  - 3.5.2. Supporting facts from GLAA
  - 3.5.3. Questions and discussion
  - 3.5.4. Appointment of 'lead' retailer if not done so already and deemed to be necessary
  - 3.5.5. Agreement on next actions, including media engagement where necessary
  - 3.5.6. On closure of call, email from supplier to confirm above and to contain initial Action Plan or post incident review which highlights gaps in process, root cause and corrective action required by the supplier, labour provider etc.
- 3.6. The 'lead' retailer will:
  - 3.6.1. Coordinate any retailer only conference calls and/or meetings on the matter, promoting appropriate confidentiality with regard to information shared;
  - 3.6.2. Coordinate conference calls and/or meetings on the matter with the supplier and other retailers. These calls would cover if deemed appropriate: actions and information expected from a supplier at what points; organise, including confirmation of funding, and appoint a specialist/auditor to coordinate a social compliance audit/investigation (such audits should not occur whilst the criminal investigation phase is active and only after the GLAA has advised that it is appropriate to do so without risk to the investigation) and to receive and disseminate subsequent reports; provision of support, as may be deemed necessary or helpful for the supplier; discussions on remediation and lessons learned. The lead retailer will not be empowered to make binding decisions creating commercial impacts. Information provided in confidence by the supplier will be treated as such by all parties and will not be shared beyond the relevant retailers, the BRC or the appointed social compliance specialist/auditor without the explicit approval of the supplier.
- 3.7. The BRC will coordinate any media release on behalf of, and in agreement with, the retailers, collaborating with the GLAA, the supplier, retailers and others as may be relevant. Where suppliers lead on media communications, retailers will offer support. BRC and GLAA will appropriately reflect the positive contribution made by suppliers who have identified issues within their business and engaged appropriately with the enforcing authorities.
- 3.8. Any feedback or complaint by a supplier on the application of this protocol may be made either to the lead retailer or to the BRC Sustainability Policy Adviser, as the supplier deems appropriate. A formal response will be provided where one is requested.