

# **Modern Slavery Audit Checklist**

## Tools and Tips for a Healthy Workplace

A **Modern Slavery Audit** is a crucial tool for ensuring that organizations and their supply chains are free from practices related to modern slavery and human trafficking. Here's a comprehensive checklist designed to help auditors assess compliance, identify risks, and implement best practices regarding modern slavery.

## 1. Policy and Commitment

- ✓ **Modern Slavery Policy**: Confirm the existence of a clear, publicly accessible modern slavery policy.
- ✓ Board Approval: Verify that the policy is approved by senior management or the board.
- ✓ **Employee Awareness**: Ensure employees are aware of and understand the policy.

## 2. Risk Assessment and Due Diligence

- ✓ **Risk Identification**: Identify areas of the organization and supply chain at high risk of modern slavery.
- ✓ **Supplier Assessment**: Assess and document the due diligence processes for new and existing suppliers.
- √ Risk Mitigation: Evaluate measures taken to mitigate identified risks (e.g., contract clauses, supplier audits).

## 3. Supply Chain Management

- ✓ **Supplier Code of Conduct**: Check if suppliers are required to adhere to a code of conduct that includes modern slavery provisions.
- ✓ Contract Clauses: Verify that contracts with suppliers include clauses related to modern slavery prevention.
- ✓ **Supplier Monitoring**: Review the processes for ongoing monitoring and assessment of suppliers regarding modern slavery.

## 4. Training and Awareness

- ✓ **Employee Training**: Confirm that employees receive regular training on modern slavery, particularly those involved in procurement and supply chain management.
- ✓ **Supplier Training**: Check if suppliers receive training or are provided with resources on modern slavery awareness and compliance.
- ✓ Awareness Programs: Evaluate the effectiveness of awareness programs for employees and suppliers.

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### 5. Reporting Mechanisms

- ✓ **Whistleblowing Policy**: Verify the existence of a whistleblowing policy that encourages reporting of modern slavery concerns.
- ✓ Reporting Channels: Ensure there are confidential and accessible channels for reporting modern slavery concerns.
- ✓ **Investigation Process**: Review the process for investigating reports of modern slavery and the actions taken.

## 6. Documentation and Record-Keeping

- ✓ **Policy Documentation**: Check the documentation of the modern slavery policy and related procedures.
- ✓ **Risk Assessments**: Ensure risk assessments are documented and regularly updated.
- ✓ Audit Records: Verify that records of supplier audits and due diligence processes are maintained and reviewed.

#### 7. Remediation and Corrective Actions

- ✓ Remediation Plans: Confirm that there are procedures for addressing and remedying instances of modern slavery.
- ✓ **Corrective Actions**: Evaluate the effectiveness of corrective actions taken in response to identified issues.
- ✓ Continuous Improvement: Assess processes for reviewing and improving modern slavery prevention measures.

## 8. Compliance with Legal and Regulatory Requirements

- ✓ **Legal Compliance**: Ensure compliance with relevant laws and regulations regarding modern slavery (e.g., UK Modern Slavery Act, California Transparency in Supply Chains Act).
- ✓ Regulatory Reporting: Verify that any required reports or statements (e.g., Modern Slavery Statements) are accurately completed and submitted.
- ✓ **Updates on Legal Changes**: Check if the organization stays updated on changes in modern slavery laws and regulations.

## 9. Stakeholder Engagement

- ✓ Internal Stakeholders: Confirm engagement with internal stakeholders (e.g., employees, management) on modern slavery issues.
- ✓ External Stakeholders: Evaluate the organization's engagement with external stakeholders (e.g., suppliers, NGOs) on modern slavery initiatives.
- √ Collaboration: Assess participation in industry initiatives or collaborations aimed at combating modern slavery.

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#### 10. Audit and Review

- ✓ **Regular Audits**: Verify that regular internal and external audits are conducted to assess compliance with modern slavery policies and practices.
- ✓ Audit Findings: Review findings from audits and ensure that any issues are addressed promptly.
- ✓ **Continuous Monitoring**: Evaluate the processes for continuous monitoring and review of modern slavery risks and compliance.

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