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Leading retailers in the UK and modern slavery statements

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Abstract

Modern slavery is an insidious problem in many sectors of the global economy, and it is perceived to be an issue in the retail industry. However, modern slavery has received little attention in the academic retail literature and this paper looks to add to this literature by exploring one of the ways in which the leading retailers in the UK have publicly addressed the issue, by reviewing their modern slavery statements. The paper includes an outline of modern slavery, a literature review, a description of the frame of reference and method of enquiry, an exploratory review of the modern slavery statements adopted by the ten leading retailers in the UK, some reflections on these statements, and a conclusion which summarises the paper and outlines future research challenges and opportunities.

Keywords: Modern Slavery, Modern Slavery Statements, UK Retailers, Auditing, Research Challenges and Opportunities

Introduction

Modern Slavery, simply defined as ‘the severe exploitation of other people for personal or commercial gain’ (Anti-Slavery International 2021) is an insidious problem in many sectors of the global economy. Irving (2016) asserted his belief that ‘the consumer sectors are most at risk of exposure to modern slavery’, and more ‘specifically it is the food producers, retailers, apparel, tobacco and consumer electronics firms that are the most vulnerable.’ Steiner-Dicks (2019) claimed ‘despite genuine efforts by many companies to identify and mitigate risks, the UK supply chains of some of our largest retailers continue to be infiltrated by traffickers, the mafia and gangs, who take advantage of weak human rights due diligence and recruitment in second tier suppliers.’ At the same time, in outlining ‘how we have influenced the issues that matter to the industry’, the British Retail Consortium’s (2021) banner headline was ‘Retailers at the Forefront of Tackling Modern Slavery.’ However, the issue of modern slavery has received limited attention in the academic retail literature. With these thoughts in mind, this paper looks explore one of the ways in which leading retailers in the UK have publicly addressed this issue by reviewing their modern slavery statements. As such, the paper looks to add to the current literature on modern slavery within retailing. The paper includes an outline of modern slavery, a literature review, a description of the frame of reference and method of enquiry, an exploratory review of the modern slavery statements adopted by the ten leading retailers in the UK, some reflections on these statements, and a conclusion which summarises the paper and outlines future research challenges and opportunities.

Modern slavery

The history of slavery is conventionally traced back some 11,000 years to the origins of sedentary agriculture, but defining slavery, and modern slavery, is complex. The first formal international definition of slavery, namely, ‘slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised’ (United Nations Office of the High Commissioner Human Rights 2021) was signed in 1926. That said, Allain and Bales (2012) argued ‘the very term slavery and its contours are contested’ but suggested that ‘the primary indicator of slavery is that of control—control that diminishes the agency of the slave, normally demonstrated by the physical control of the slave that prevents escape from enslavement and forces him or her to work.’

Perhaps more practically, Unseen (2021a), a charity working ‘towards a world without slavery’, described modern slavery as an umbrella term for the ‘activities involved when one person obtains or holds another person in compelled service.’ Modern slavery activities are generally seen to include human trafficking, forced labour, debt bonded labour, descent based slavery, slavery of children, and forced or early marriage. Each of these activities has its own defining characteristics. Human trafficking, for example, involves the use of violence, threats, or coercion to transport, recruit, or harbour people, for labour, forced prostitution or marriage. Debt bonded labour, perhaps the most widespread form of modern slavery, occurs where people trapped in poverty borrow money, and are forced into work to pay off the debt, and in so doing, lose control over their employment conditions, and the original debt.

In many ways modern slavery often effectively goes unseen in that many of the people working in slavery are in companies’ supply chains, while those in customer facing operations might look very much the same as many of their fellow workers. That said, Unseen (2021b), identified some indicative signs of modern slavery and human trafficking. Namely, individuals who show signs of physical or psychological abuse, look malnourished, unkempt, anxious or agitated, or appear withdrawn or neglected. Their living conditions might be dirty, cramped and overcrowded and they might always wear the same clothes, have few personal possessions, and no identification documents. Further, they might be

dropped off at, and collected from, their place of work, early in the morning and late at night, and they may be reluctant to seek help from fellow workers and be very wary of law enforcement officers and agencies.

Literature review

To date, modern slavery in the retail industry has attracted little attention in the academic literature. In part, this may reflect a reluctance amongst retailers, and the companies in their supply chains, to permit researchers access to documentation and decision makers to allow them to pursue research investigations into modern slavery. Denying access for such research may reflect commercial sensitivities, and/or concerns about essentially publicly unspoken corporate concerns about employee recruitment and labour practices within supply chains, and attendant fears of damaging publicity, and possibly criminal prosecution, if modern slavery practices are explicitly revealed. In part the lack of published research on modern slavery within the retail industry may also reflect researchers' fears for their personal safety if looking to undertake research, in settings where illegal, and criminal activity may be commonplace, and then publish their research findings.

The limited research published on modern slavery to date tends to have a value chain, rather than a specifically, retail focus. Monciardini et al.'s (2021) review of compliance with the UK's modern slavery legislation, in the food and tobacco sector, focussed on 10 large companies, including four retailers. In summarising their work, the authors suggested that 'our study underlines the risks of the managerialization of modern slavery law, whereby symbolic structures come to be associated with legal compliance, even when they are ineffective at tackling modern slavery' (Monciardini et al. 2019). Benstead et al. (2018) focused on 'how horizontal collaboration aids organisations in responding to modern slavery' in an investigation of the 'evolving modern slavery-related practices' of a large company in the textiles and fashion industry, and 'its horizontal collaboration with 35 brands/retailers.' The authors emphasised that modern slavery was central to purchasing practices within supply chains and that 'modern slavery awareness therefore needs to be filtered throughout the organisation, which can be achieved by training all levels and departments' (Benstead et al. 2018).

In their examination of how firms were responding to modern slavery in their supply chains, Flynn and Walker (2020), drew attention to 'high profile modern slavery cases involving the supply chains of retailers', and that 'firms in industries such as wholesale/retail have made noticeable changes across their structures, policies and practices', but there was no detailed focus on retailing or on specific retailers. Christ et al.'s (2019) research on supply chain disclosures about modern slavery in Australia, revealed that many companies in the banking and finance, mining and retail industries were to the fore in disclosing their positions on modern slavery, but here again neither the retail industry nor individual retailers were the subject of detailed investigation. Stevenson and Cole (2018) looked to examine how retail and consumer durable and apparel organisations reported on the detection and remediation of modern slavery in their operations and supply chain. The authors concluded that while some companies provided very little information on their approach to modern slavery, others were more fulsome, even to the point of appearing to see their modern slavery statement 'as an opportunity to compete on being ethical' (Stevenson and Cole 2018). At the same time, Stevenson and Cole (2018) also argued 'modern slavery is somewhat distinct from other social issues in supply chains', namely that 'its hidden, criminal dimension; its involvement of third party labour agencies; and the legislative requirement to provide end-to-end transparency make many standard practices insufficient or inappropriate.'

At the international level, in looking to examine 'why slavery thrives in multinational corporations' global value chains', Stringer and Michailova (2018) emphasised the role of these value chains in linking supplier firms, labour contractors, and global retailers, and suggested 'it is not surprising slavery is prevalent in both developed and developing countries.' More parochially, Ras and Gregoriou (2019) examined the modern slavery statements of three UK high street retailers and concluded that the statements failed to acknowledge the agency of those workers affected by modern slavery and labour exploitation, and they concluded that 'more needs to be done to account for the causes of modern slavery so that retailers can prevent, rather than react to, it.'

On the conceptual side, although Caruana et al. (2020) argued that existing theories were limited in their ability to conceptualise modern slavery, three sets of approaches, namely, institutional theory, contingency theory, and stakeholder theory, merit attention. Flynn and Walker (2020) employed institutional theory, to explore how large firms were responding to modern slavery risks in their supply chains, arguing that the transparency provision in the 2015 legislation represented institutional, rather than market, pressure on companies. Gold et al. (2015) argued that research questions about modern slavery could be fruitfully framed by contingency theory in that it was seen to help to achieve a deeper appreciation of the importance of culture, geography, legislation and regulation. Stevenson and Cole (2018) argued that stakeholder theory was valuable in that while the primary audiences for modern slavery statements were external stakeholders, it was important for companies to consider what their modern slavery statements revealed to their suppliers.

This literature review of modern slavery in the retail industry suggests that the field is currently fragmented, and at a best, embryonic. While the review provides a sense of academic context, and some basic reference points for the paper, it does not identify modern slavery in the retail industry as distinct field of research, not least in that it lacks an agreed

framework, a body of empirical research, and a robust theoretical foundation. Perhaps more importantly in the light of the aims of this paper, the current literature review reveals little research on how large retailers have addressed modern slavery. As such, this highlights a gap in the retail literature, that merits attention.

Frame of reference and method of enquiry

The authors chose a simple method of enquiry to investigate how the leading retailers in the UK addressed modern slavery. Firstly, the top ten retailers in the UK, by turnover (Statista 2021), namely Tesco, J. Sainsbury, Asda, Morrisons, the John Lewis Partnership, Aldi, Marks and Spencer, Co-op, Amazon, and the Walgreen Boots Alliance, were selected for study. As the leading players in the UK's retail economy, the selected retailers might be expected to reflect good practice in publicly addressing modern slavery. The authors undertook a series of Internet searches, using modern slavery statement and the name of each of the selected retailers, as key terms, on Google in April 2021. These searches revealed that all of the selected retailers had published a modern slavery statement.

The most recent modern slavery statements from the selected retailers provided the empirical material for this paper. As these statements are in the public domain on the retailers' corporate websites, the authors took the view that they did not need to seek permission to use them. The modern slavery statements were relatively brief, clearly structured and well signposted, and the authors felt that any form of content analysis would not be necessary. Rather, the authors undertook a close reading of the statements and drew out the important issues and themes, and the aim was to explore how the leading retailers publicly expressed, and evidenced, their approaches to tackling modern slavery. The paper draws extensively on selected quotations drawn from the selected retailers' websites. Here, the authors were of the opinion that an important way of capturing the retailers' approach to modern slavery was to cite the retailers' own words, not least in that such citations could convey corporate authenticity and offer greater depth of understanding. That said the focus on the paper is on providing a general review, rather than a comparative analysis, of how the leading retailers in the UK were addressing modern slavery.

The three largest retail companies in the UK, namely, Tesco, J. Sainsbury and Asda are often referred to as food retailers, though in part, this is a misnomer in that while they were all initially established as grocery retailers, they now all sell a wider range of consumer goods. Tesco, founded in 1919, has some 3,400 stores within the UK and it trades from hypermarket, superstore, and convenience store formats and online. Sainsbury's founded in 1869, trades from over 600 supermarkets, some 800 convenience stores, as well as 800 stores operating under the banner of Argos, throughout the UK. Asda, was founded in Yorkshire in 1949, and though originally based in the north of England, the company now trades from over 600 supermarkets and superstores throughout the UK and includes the George chain of clothing stores. Morrisons, founded in 1899 in Bradford, Yorkshire, trades from some 500 stores across England, Wales and Scotland. The John Lewis Partnership, founded in 1929 operates a chain of over 30 department stores and some 300 Waitrose food stores and supermarkets.

Aldi, founded in 1946, is a German owned discount supermarket chain which trades from some 900 outlets within the UK. Marks and Spencer, founded in 1884 in Leeds, specialises in the sale of clothing, home products and food products, and trades from some 1,000 stores within the UK. The Co-op founded in 1844, is a consumer cooperative with a diverse range of retail operations, principally food retailing, but which also includes electrical retailing, travel agencies and funeral services, and has some 4,000 outlets in the UK. Amazon, founded in 1994, is a US technology company, which offers a wide range of products, including books, consumer electronics, groceries, beauty product, sporting goods toys, and games for sale online. The Walgreen Boots Alliance, founded in 1849, is a health and beauty and pharmacy retailer and has some 2,500 outlets across the UK.

Findings

The modern slavery statements posted by the leading retailers in the UK varied in style, and content, but rather than looking to describe each statement in detail, the authors looked to identify, and draw out, a number of general themes. More specifically, the authors identified eight interlinked themes, namely, corporate commitment: policies: risk assessment and management: due diligence; audit; awareness raising, capacity building, and training: collaborative activities; and performance measures; which effectively captured the spirit, if not always the full detail, of the selected retailers' approach to modern slavery statements.

The retailers' corporate commitments were expressed in a variety of ways. Simon Roberts, Chief Executive at J. Sainsbury, acknowledged 'modern slavery and human trafficking are abhorrent practices that still exists in many parts of the world. Including the UK', and asserted 'we are proud to continue our commitment and duty to respect human rights, identify vulnerable workers and we will not tolerate any form of slavery or servitude in our own operations or supply chains' (J. Sainsbury 2020). In a similar vein, Marks and Spencer (2020) recognised that 'modern slavery is a growing global issue, and we understand our responsibility to prevent, mitigate and remediate where necessary, the risks of human trafficking, forced, bonded, and child labour, and to respect human rights in our operation and our supply chain.' Tesco (2020) emphasised that the company was 'fully committed to playing our part in eradicating modern slavery', and it

‘firmly supported transparency and collaboration to eliminate the risks of modern slavery.’ Amazon (2020) reported ‘modern slavery is one of the most complex and important human rights challenges of our time’ and emphasised ‘we do not tolerate modern slavery.’ The Walgreen Boots Alliance (2020) recognised ‘its responsibility to address and mitigate the risk of modern slavery and human trafficking in its operation and supply chain’, and affirmed its commitment to ensure ‘that every worker should have freedom of movement and that no worker should be indebted or coerced to work or to pay for a job.’ John Murrells, Chief Executive of the Co-op reported that despite the upheavals caused by the Covid-19 pandemic, ‘our focus and commitment to tackle modern slavery remains unwavering’ (Co-op 2020).

The selected retailers outlined their policies designed to tackle modern slavery. Tesco (2020), for example, cited the company’s adherence to the United Nations Declaration of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the Base Code of the Ethical Trading Initiative and claimed, ‘we take any breach of our policies or allegations of labour abuse very seriously.’ In a similar vein, J. Sainsbury (2020) reported having ‘well-developed policies and processes in place to avoid causing or contributing to adverse human rights impacts through our activities, including any form of slavery, and we are committed to addressing such impacts if they occur.’

In addition to reporting on its adherence to a range of appropriate external policies, Morrisons (2020) provided details of its internal policy on Preventing Labour Exploitation in Manufacturing and Logistics, which included information for labour providers on the prohibition of recruitment fees and support for employees to report concerns and suspicions of modern slavery practices. Asda (2020) emphasised that its policies on modern slavery covered ‘how we source our products, employ people appropriately, and how we operate and interact with modern slavery legislation in our business and with suppliers’, and that ‘all Asda colleagues, contractors and third-party workers were expected to adhere’ to its policies. Aldi (2020) claimed an ‘integrated strategy for tackling modern slavery’, and that its policies set out ‘the minimum standards we expect from our suppliers.’ These standards include a ban on forced or bonded labour and on child labour, the payment of legal minimum wages, maximum length of the working week, and freedom from discrimination in the workplace, and ‘all suppliers are required to apply these standards across their own supply chain and to any approved sub-contractors’ (Aldi 2020). Lidl (2020) emphasised that the company pursued ‘a range of buying policies to protect the workers in our supply chains from the risks of modern slavery.’

Risk assessments offered some insights into the selected retailers’ perceptions of the sources of modern slavery. Marks and Spencer (2020) acknowledged that as ‘the manifestations of modern slavery are complex and hidden’, and the company’s approach to risk assessment includes the detailed mapping of supply chains and operations, supplier engagement, and supplier surveys, that all to help prioritise activities to tackle the problem. Marks and Spencer (2020) also reported on working with its logistics partner to better understand vulnerability to modern slavery risks amongst its warehousing and logistics providers. The Co-op (2020) reported taking the decision to restrict sourcing from countries in which the company believes there is a high risk of poor labour practices.

J. Sainsbury identified, and mapped out, higher risk products and countries within its supply chains. In focusing on food and grocery, for example, high risk products included sugar, tea, coffee, bananas, cocoa, nuts and fish, and for coffee, for example, Columbia, Indonesia, Ethiopia and Kenya were seen to pose high risks. Within the company’s footwear and clothing supply chains, nine countries, including Bangladesh, India, Sri Lanka, Vietnam and Morocco were listed as posing high risks. The Co-op (2020) identified significant labour rights risks, including modern slavery, in its supply chain, across a number of fresh and packaged products, including fish and seafood, canned tomatoes, cocoa, sugar, and bananas, from 17 sourcing countries, including the UK, Spain, Morocco, Kenya and the Dominican Republic.

Due diligence processes are reported as an important theme in the selected retailers’ modern slavery statements. In recognising that the ‘risks of modern slavery are dynamic’, Tesco (2020), for example, reported that it followed ‘a robust due diligence process’, and that the information gathered from a wide range of stakeholders as part of this process, enabled the company to ‘continually reassess and respond to potential and actual risks.’ J. Sainsbury (2020) reported conducting ‘due diligence across our business and supply chain, monitoring for indicators of any forms of slavery or human trafficking and checking there are sufficient controls in place.’ Within its food business, for example, J. Sainsbury (2020) reported helping its suppliers to ‘build their people management and systems capabilities’, and here the focus is on supporting new suppliers on the standards expected of them, listening to workers to understand what is important to them, and identifying improvement opportunities.

Marks and Spencer (2020) argued that ‘having established risk, we conduct due diligence within our supply chains and operations to understand whether there is evidence of modern slavery issues, and whether there are enough controls in place.’ Morrisons (2020) differentiated between the due diligence processes in its own operations and those in its supply chain. The company argued that within its own business, the primary risks were in its vertically integrated manufacturing and logistics operations, which ‘require temporary, agency provided and migrant labour to manage seasonal increases in capacity’ (Morrisons 2020). More specifically Morrisons (2020) reported on the establishment of a Modern Slavery Steering Group, which focuses upon regulatory compliance, operations, training, incident management, and remediation. In addressing modern slavery risks in its supply chain, Morrisons (2020), emphasised that its international technical managers played an important role in capturing information on working conditions, labour rights and modern slavery risk during their regular site visits.

Independent auditing, designed to monitor suppliers' commitments to eradicating modern slavery, was often seen to be an integral part of the due diligence process. Morrisons (2020), for example, emphasised that 'third party audit remains the primary due diligence activity in our own-brand supply chain', and that 'audits provide the independent verification of the labour standards at our suppliers' sites.' In a similar vein, Lidl (2020) reported that suppliers identified as having a high risk to modern slavery were required to undertake an independent social audit, which is monitored 'to ensure that corrective actions are closed off within the agreed timescales.' Tesco (2020) reported 'we require all direct supplier sites in high risk countries to have an annual human rights audit before they start supplying Tesco, and then on an annual basis.' The John Lewis Partnership (2020) reported that the company required 'sites to have an independent audit every two years' for its general merchandise supply chains, and that if a supplier 'is unwilling or unable to meet the necessary improvements within the agreed timescales, they are no longer able to supply the Partnership.'

Aldi (2020) acknowledged that 'third party audits may not always provide a true picture of working conditions at a supplier site' and reported carrying out its own ethical audits and site visits as part of the company's 'social assessment programme.' Aldi (2020) further reported that such assessments, undertaken by a team of ethical auditors based in Bangladesh and Hong Kong, focus on whether suppliers are meeting the company's ethical standards and on 'building co-operation and gaining increased transparency from suppliers so that we can work with them to improve conditions for workers in all sites that produce our products.'

The selected retailers also acknowledged the importance of awareness raising, capacity building, and training in looking to tackle modern slavery. Asda (2020), for example, emphasised 'we are equipping Asda colleagues with the skills they need to engage with the complexities of modern slavery', and that 'an educated and informed colleague is vigilant to these issues and can respond accordingly.' More specifically, Asda (2020) reported that line managers with supplier facing or sourcing roles received modern slavery training via a series of e-learning modules. This training 'defines modern slavery, and indicators to look out for, provides information on UK legislation, case studies, best practices and what to do if a colleague has concerns for someone's safety.' In a similar vein Tesco (2020) emphasised 'raising awareness of modern day slavery, both within our business and our supply chains, is an important part of our strategy' and reported that the company required 'all Tesco suppliers, including service providers such as labour agencies, based in the UK', to attend training activities.

In addressing 'training, awareness and capacity building', Morrisons (2020) reported 'we continue to work to ensure that colleagues at all levels who need to understand modern slavery risk have access to relevant information.' At the same time, Morrisons (2020) reported offering free training to all labour providers and suppliers within the UK. Marks and Spencer (2020) emphasised that 'training on modern slavery and trafficking' was a 'key focus for the business and our extended supply chain', and that the company's food business had supported several events and conferences on modern slavery.

J. Sainsbury (2020) reported providing training 'for our property colleagues and key suppliers so they can better understand slavery indicators to look for in the construction industry.'

Some of the selected retailers emphasised playing their part in a number of collaborative activities designed to drive change on modern slavery. Morrisons (2020), for example, acknowledged that 'modern slavery issues in global food supply chains are often complex and challenging', and recognised that 'we cannot deliver meaningful impact on our own and remain committed to working with others in an open and collaborative manner to leverage change.' More specifically Morrisons outlined its work with a variety of organisations including the Hope for Justice and Slave-Free Alliance, the Ethical Trading Initiative, the Gangmasters and Labour Abuse Authority and the Responsible Car Wash Scheme. Lidl (2020) also recognised that 'we cannot tackle modern slavery alone and are therefore collaborating with our network of partners and stakeholders to leverage meaningful change by improving working conditions and tackling modern slavery across the food sector.'

A number of the selected retailers suggested that they were moving towards reporting on their performance, and on identifying key performance indicators in meeting their commitments to tackling modern slavery. Tesco (2020), for example, reported monitoring annual progress against thirteen corporate commitments to tackling modern slavery, and outlined the company's future plans to further strengthen its approach to managing the risk on modern day slavery within its business and its supply chains. In addressing its 'key performance indicators',

J. Sainsbury (2020) argued that 'monitoring the effectiveness of actions to identify and prevent slavery and human trafficking is a challenge for our entire industry' and reported on key performance indicators focused on training and sustainable sourcing. The Co-op (2020) outlined its progress against thirteen targets the company set for itself for 2020. Here, the Co-op (2020) reported being behind schedule in improving the lives of workers by carrying out and publishing human rights impact assessments in three high risk food supply chains but reported achieving its targets in working with its suppliers to manage the risks of modern slavery.

Reflections

The leading retailers' modern slavery statements captured their public approach to what is a complex and challenging issue, but some wider issues merit reflection and discussion. The findings reported above suggested that while the selected retailers emphasised their opposition to modern slavery, some of their current commitments were both aspirational and expectational and can be seen as a work in progress. Aspirational, in that they expressed a desire to tackle modern slavery problems within the retail industry, and expectational in that the retailers, expected their suppliers to comply with standards and requirements established in response to UK government legislation.

In emphasising their opposition to modern slavery, and in reporting on their introduction of measures to monitor and tackle the problem, the selected retailers face a number of challenges. Identifying, monitoring and tackling modern slavery within supply chains and in recruiting labour, arguably presents two of the biggest challenge for the retailers. That said, many of the selected retailers claimed their approach to tackling modern slavery in their supply chains was effectively underwritten by independent auditing. However, general concerns have been expressed about the efficacy of the audit process in safeguarding against modern slavery.

The pressure group Anti-Slavery International (2021), for example, argued that such approaches have their limitations, not least in that 'the quality and scope of auditing may be questionable, or there may be practical difficulties such as auditors being unable to speak with workers in their own language.' LeBaron et al. (2017) argued 'the growing adoption of auditing as a governance tool is a puzzling trend, given two decades of evidence that audit programs generally fail to detect or correct labor and environmental problems in global supply chains.' More specifically, LeBaron et al. (2017) argued that 'retail and brand companies shape the audit regime in ways that legitimate and protect their business model' and 'preserves the retail business model that hinges on rewards from cheap labor, cheap goods, low prices, and short-term purchase contracts.' More positively, Benstead et al. (2020) argued that 'a targeted audit', which investigates 'the end-to-end recruitment process by using a parallel structure of management and worker interviews and documentation review', is 'more likely to reveal key indicators of modern slavery.'

The concept of the modern slavery statement has attracted a number of criticisms. New and Hsin (2021), for example, argued that while modern slavery statements 'present interesting information about the management of working conditions in the firms' supply chains, they do little to address the problems of modern slavery per se.' Simic and Blitz (2019) argued that modern slavery statements are 'often perfunctory and are used to satisfy international agendas and country commitments, or to enhance the perception of the country and its position in the global outsourcing business.' Simic and Blitz (2019) also argued that the capacity of modern slavery statements 'is often limited, especially as it regards remedying risks', and that 'the quality, scope, depth, and regularity of reports are frequently compromised, especially since there are no meaningful sanctions for non-compliance.'

There have also been issues about the ambivalent role of the media in publicising modern slavery statements. Simic and Blitz (2019, p. 11), for example, argued that on the one hand 'companies' over-reliance on media exposure of transparency statements has been instrumentalised by the state which has paid lip service to proper law enforcement mechanisms.' On the other hand, Simic and Blitz (2019, p. 11) also suggested that 'the possibility of unsolicited media publicity may often act as a deterrent for businesses and could push them in the opposite direction: it can enhance non-compliance or highly restrained compliance.'

More generally, the findings have some implications for the three theoretical approaches mentioned earlier. The selected retailers have responded positively to UK government legislation and pressure to introduce modern slavery statements, and as such their approach can be seen to be consistent with institutional theory. At the same time, the findings suggested that while the leading retailers in the UK emphasised their commitment to tackle modern slavery and outlined their approach, to due diligence, and to raising awareness, building capacity and training, their largely uncritical enthusiasm for independent auditing, and for identifying and reporting on performance measures was more limited. This, in turn suggests that institutional theory does not tell the full story in conceptualising corporate approaches to modern slavery.

In highlighting the role and importance of a number of stakeholders, including suppliers and employees, in identifying and developing awareness of modern slavery, stakeholder theory might be seen to be useful in informing how the selected retailers have developed their modern slavery statements. However, stakeholder theory is generally seen to be based on, and around, open relationships, trust and shared goals, and these qualities are certainly not common to all the stakeholders involved in modern slavery. Contingency theory helps to shed some light on how the leading retailers in the UK have approached modern slavery, but perhaps only in so far as it signals that many of the characteristics of the retail industry seem to make it susceptible to modern slavery.

Conclusions

This paper has provided an exploratory review of how the leading retailers in the UK have addressed modern slavery via an examination of their modern slavery statements. As such, the paper adds to the limited literature on modern slavery within the retail industry. Eight themes captured the spirit of the selected retailers' modern slavery statements,

namely, corporate commitment; policies: risk assessment and management: due diligence; audit; awareness raising, capacity building, and training: collaborative activities; and performance measures. Further, the authors suggested that in some ways the selected retailers' approaches to modern slavery were aspirational and expectational and they raised concerns about the nature of the auditing processes employed by the retailers.

The paper has a number of limitations. The empirical material for the review is drawn exclusively from the corporate websites of the selected retailers, at a set point in time, and does not include any primary information supplied by the retailers' executives, managers or employees, or any information obtained from the retailers' suppliers or from employment agencies. However, the authors believe this approach is appropriate in what is an explanatory review paper, and that the paper makes a small contribution to an area that has received limited attention to date in the academic retail literature, and that it may provide a platform for future research into modern slavery in the industry.

However, while modern slavery within the retail industry, offers a potentially rich variety of research opportunities, it is important to recognise that it a very challenging research arena. Slavery is illegal in the vast majority of jurisdictions, but it can also be a lucrative economic activity, and those individuals and organisations involved in modern slavery, human trafficking and bonded labour, will generally do all they can to hide, and maintain the secrecy of, their activities. Researchers who look to conduct primary research into modern slavery activities may be placing themselves, possibly their research colleagues, and those who participate in such research, in serious personal danger. Problems, and tactics designed to minimise such problems, are rarely addressed in the research literature but, they may curtail many potentially promising modern slavery research agendas. At the same time, researchers may face a range of ethical issues, not least researchers' responsibility to those who participate in their research. More generally, there are some guidelines for social science researchers looking to pursue hidden activities (e.g., Ellard-Gray et al. (2015)), but researching modern slavery within the retail industry seems fraught with difficulties and dangers.

That said, a number of potential research opportunities into corporate approaches to modern slavery within the retail industry can be identified. Here, the ways in which a wider variety of retailers address the issue of modern slavery merits attention, and could include large scale questionnaire surveys of, as well as personal interviews and focus groups with, senior retail executives to learn how retailers have developed, and continually look to strengthen, their policies on modern slavery. Such research agendas may also explore if, and how, employees, customers, suppliers, governments, and law enforcement agencies are involved in the policy development process. In addition, such research into modern slavery within the retail industry may help to both test, and illuminate, theoretical approaches to modern slavery, and perhaps more importantly, help to answer the call by Gold et al. (2015) for new theory development to facilitate the understanding of modern slavery.

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