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MODERN SLAVERY STATEMENTS AND UK RETAIL SUPPLY CHAINS

Peter Jones

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 in retail supply chains, has attracted little or no attention in the academic literature, and as such, this represents a gap in the current literature. This chapter looks to offer a small contribution to filling that gap by illustrating, and offering a commentary on, one of the ways in which the UK's leading retailers have publicly addressed modern slavery in their supply chains, by reviewing their modern slavery statements. The commentary includes an outline of modern slavery and modern slavery statements, a description of the frame of reference and method of enquiry, a literature review, an exploratory review of the modern slavery statements developed by the UK's ten leading retailers, a discussion of some of the academic and corporate implications raised by the review, and a conclusion which outlines some of the limitations of the work and suggestions for future research.

Keywords: modern slavery, modern slavery statements, UK retailers, supply chains, audit.

1. Introduction

Modern Slavery, simply defined as *'the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation'* (Such et al. 2018, webpage) is an insidious problem in many sectors of the global economy, and is often seen as an acute challenge for supply chain management (e.g. Gold 2015). Irving (2016, webpage) asserted his belief that *'the consumer sectors are most at risk of exposure to modern slavery'*, and that *'it is the food producers, retailers, apparel, tobacco, and consumer electronics firms that are the most vulnerable.'* More specifically, Steiner-Dicks (2019, webpage) 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.'* Given that the majority of the UK population visit the UK's leading retailers on a weekly basis, and in some cases on a daily basis, such visits might effectively be seen to represent their regular contact with modern slavery. However, modern slavery in retail supply chains, has attracted little or no attention in the academic literature, and as such, this represents a gap in the current literature.

This chapter looks to make a small contribution to filling that gap by illustrating, and offering a commentary on, one of the ways in which the leading retail companies in the UK have publicly addressed modern slavery in their supply chains, namely by reviewing their modern slavery statements. As such, the chapter follows Flynn and Walker's (2021) argument that modern slavery statements *'provide a unique window into corporate behaviour on modern slavery.'* The chapter includes an outline of modern slavery and modern slavery statements, a description of the frame of reference and method of enquiry, a short literature review, an exploratory review of the modern slavery statements published by the UK's

leading retailers, a discussion of some of the academic and corporate implications raised by the review, and some suggestions for future research agendas.

2. Modern Slavery and Modern Slavery Statements

Defining slavery, and modern slavery, is a complex issue, though the aim here is simply to appreciate, and illustrate, that complexity rather than to analyse it in detail. Allain and Bales (2012, p. 2) cited the first formal international definition of slavery adopted in 1926, 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, webpage), but argued that *'the very term slavery and its contours are contested.'*

Mende (2019, p. 233) argued that there was no single agreed definition of modern slavery, rather that it *'can be summarised by three denominators'*, namely *'the control of a person over another'*, *'an involuntary aspect in their relation'*, and *'the element of exploitation.'* For Manzo (2006, p. 522), *'the constituent elements of modern slavery are identified as control without ownership: violence (or the threat of violence); coercion (loss of freedom and choice); and exploitation (of labour power through unpaid work).'* In working towards a definition of modern slavery, Landman and Silverman (2019) drew attention to the Bellagio-Harvard Guidelines on the Legal Parameters of Slavery. Here Landman and Silverman (2019, p. 277) argued that these guidelines emphasised *'the notion of control and the lack of agency for victims of slavery, where different forms of coercion maintain power over individuals and prevent them from leaving the conditions of their enslavement.'*

Landman and Silverman (2019, p. 277) also argued that *'popular understandings of slavery often conjure up images of African slaves brought to the Caribbean, Brazil and the US, where such images typically include slave ships, slaves bound in chains and slaves auctioned at market'*, but that *'such imagery tends to obscure current realities of slavery and relegate it as a problem of the past.'* Further, Landman and Silverman (2019, p. 277) argued that *'slavery is alive and well and that it has taken on new forms or updated old forms, comprising a variety of practices that include debt bondage, domestic servitude, forced prostitution, forced labour, forced marriage, and human trafficking.'* Debt bondage, for example, 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. Human trafficking, involves the use of violence, threats, or coercion, to transport, and often to recruit or harbour people, for labour, forced prostitution, or marriage.

Bannerjee (2020, p. 415) suggested that while slavery is a crime under international law, it remains *'a viable and profitable management practice for business'*, and that *'modern slavery, far from being an aberration, is a logical outcome of the way our political economic system is organized, and its historical origins in the colonial system.'*

Conservative estimates put the number of victims of modern slavery at over 40 million (International Labour Office 2017), with the annual profits from modern slavery estimated to be some US\$ 150 billion (International Labour Office 2014). Within the UK, Bales et al. (2015) estimated there to be between 10,000 and 13,000 potential victims of modern slavery, but this figure does not include victims of modern slavery in UK companies' supply

chains in other countries, and in many ways modern slavery often effectively goes unseen in that many of the people working in slavery are in companies' overseas supply chains.

A number of governments, as well as a range of national and international organisations, have been active in looking to tackle the issue of modern slavery. Some of the major political initiatives to tackle modern slavery have focused on urging large companies to address modern slavery both within their own operations, and arguably more importantly, in their supply chains. In 2015 the UK Government, for example, pioneered this approach in introducing the Modern Slavery Act. This legislation required all organisations with an annual turnover in excess of £36 million, to produce an annual modern slavery statement, setting out the steps they had taken to prevent modern slavery in their businesses and supply chains. More recently a small number of other countries have also introduced legislation to tackle modern slavery within supply chains. In 2018, Australia for example, introduced a Modern Slavery Bill, modelled in part on the UK legislation, which included prescribed criteria for corporate modern slavery statements.

More specifically, the UK's 2015 Modern Slavery Act gave law enforcement agencies a variety of provisions to tackle modern slavery, including a maximum life sentence in prison for perpetrators, and enhanced protection for victims. Under the terms of the 2015 legislation, while all organisations are not expected to guarantee that all of their operations and supply chains are free from slavery, their modern slavery statements must describe the steps the organisation has taken during the financial year in question to address modern slavery risks. In July 2018, the UK Government commissioned an independent review of the 2015 legislation to examine if its provisions should be strengthened. Following this review, the Government announced it planned to introduce binding rules on the content, timing, and publication of modern slavery statements, and possibly to introduce a single enforcement body to oversee compliance.

3. Literature Review

The literature on the operation and management of business supply chains (e. g. Houlihan 1985; Holmstrom et al. 2019), and more specifically of retail supply chains (e.g. Ayers and Odegaard 2017; Wen et al. 2019) is well developed, but modern slavery has received only limited attention in that literature. Caruana et al. (2020, p. 251), for example, claimed that '*modern slavery research in business and management remains significantly, and disappointingly underdeveloped*', and that the business and management literature overlooks '*the nature and prevalence of modern slavery within the businesses and supply chains of various sectors.*' This is particularly true in the retail sector. That said, two stands of the literature are important in helping to locate the chapter within the wider academic context, namely research on modern slavery in company supply chains, and on theoretical approaches to the study of modern slavery. This short literature review offers a flavour of some of this work.

Firstly, Stevenson and Cole (2018), examined how organisations in the UK reported on the detection and remediation of modern slavery in their supply chains. Their work revealed many firms used the same practices to detect and remediate modern slavery as for other social issues, but that the hidden, criminal nature of modern slavery and the involvement of third-party labour agencies demanded innovative investigative approaches. Flynn and Walker (2021) argued that companies effectively used their modern slavery

statements to signal to society that they were strengthening their policies to prevent modern slavery in their supply chains, not least because companies found to be negligent in addressing modern slavery could lose the support of their economic and political stakeholders. Geng et al. (2022) adopted an awareness-motivation-capability framework to address variations in companies' efforts to address modern slavery in supply chains. Their findings revealed that companies put more effort into addressing modern slavery in their supply chains, when there was greater media coverage of such issues, when they sourced goods and services from countries with high slavery risks, and when they have established corporate social responsibility records

Gold et al. (2015) looked to draw attention to the challenges modern slavery posed for supply chain management, and argued that a lack of ineffective indicators meant that new tools and indicator systems should be developed to consider the specific social, cultural and geographical context of supply regions. At the same time, Gold et al. (2015, p.485) suggested that once incidences of modern slavery had been detected, then *'multistakeholder partnerships, community-centred approaches and supplier development appear to be effective responses.'* Nolan and Bott (2018) focused on emerging legislative disclosure regimes as a mechanism for regulating modern slavery in supply chains. They identified *'four essential requirements'*, namely *'such legislation should incorporate human rights due diligence; it must include detailed disclosure requirements; there should be regulatory consequences for failure to comply; and finally, it should utilise the non-governmental organisations, unions, consumers and workers, to regulate supply chains'* (Nolan and Bott 2018, p. 44).

Meehan and Pinnington (2021) looked to assess if transparency in companies' supply chain statements indicated that substantive action was being taken to tackle modern slavery in their supply chains. This research suggested that companies were using ambiguity in their supply chain statements *'as a highly strategic form of action to defend the status quo, reduce accountability and delay action for modern slavery within supply chains'*, and that this ambiguity, effectively *'protects firms, rather than potential victims of modern slavery'* (Meehan and Pinnington 2021, p. 77). Benstead et al. (2020) investigated modern slavery detection and remediation in supply chains via an action research case study in the textiles and fashion industry. This study suggested that *'a targeted audit'*, which included *'investigating the end to-end recruitment process by using a parallel structure of management and worker interviews and documentation review'*, was more likely *'to identify key indicators of modern slavery'* (Benstead et al. 2020, webpage).

Secondly, Flynn and Walker (2021, p. 296) suggested that the empirical work published to date on modern slavery had *'yielded valuable insights into what firms claim to be doing to combat modern slavery'*, but that *'missing from the literature, however, is the theoretical framing of the issues'*, and that this omission *'limits our ability to understand how and why firms give effect to government and societal expectations on preventing modern slavery.'* This view was reinforced by Caruana et al.'s (2020) assertion that while modern slavery presented many opportunities for novel theory building, existing theories were limited in their ability to conceptualise modern slavery. More constructively, Gold et al. (2015) called for new theory development to facilitate the understanding of modern slavery

In looking to conceptual approaches to help to understand and interpret modern slavery, three sets of theoretical approaches, namely, stakeholder theory, contingency theory and institutional theory, merit attention. Stakeholder theory suggests that companies need to look to reflect the views of all their stakeholders, including, shareholders, suppliers, customers, employees, and the company itself, in pursuing policies. Stevenson and Cole (2018), for example, 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. Contingency theory, suggests that in addressing any issue, a company's optimal course of action is contingent upon its internal and external situation. Here, Gold et al. (2015), for example, argued contingency theory could help to achieve a deeper appreciation of the importance of culture, geography, legislation and regulation, in understanding modern slavery.

Flynn and Walker (2021) emphasised the value of institutional theory in helping to understand how companies were responding to modern slavery risks, and to explore the institutional pressures on companies to introduce measures to combat modern slavery. Here, Flynn and Walker (2021, p.296) argued that the transparency provision in the UK's 2015 modern slavery legislation represented institutional, rather than market, pressure on companies, and argued that this pressure *'is imposed on firms from outside by legislation, non-governmental organisation campaigning, professional standards, stakeholder initiatives, media coverage, and consumer activism.'* More specifically, Flynn and Walker (2021, p. 301) identified *'policy responses'* and *'practice responses'* to institutional pressures. Here, the former included policies for preventing modern slavery and codes of conduct, while the latter covered risk assessment, the development of key performance indicators and training.

4. Frame of Reference and Method of Enquiry

The author decided to concentrate his study of modern slavery in the UK's leading retailers' supply chains exclusively on modern slavery statements, in the belief that such an approach was appropriate in a field where there has been little, or no published work, to date, and he chose a simple two step method of enquiry. Firstly, the top ten retail companies in the UK in 2021/2022 by turnover, (Statista 2022), namely Tesco, J. Sainsbury, Asda, Amazon, Morrisons, Aldi, Marks and Spencer, Co-op, Lidl, Boots (part of the Walgreen Boots Alliance), were selected for study. The second step of enquiry involved a series of Internet searches, undertaken in November 2022, via Google, using the name of each of the ten selected retail companies, and modern slavery statement, as the key phrases.

The most recent modern slavery statements from the selected retail companies provided the empirical material for this chapter. As these statements are in the public domain on the selected companies' websites, the author took the view that he did not need to seek permission to use them. The modern slavery statements were relatively brief, clearly structured, and tended to follow a similar pattern and focus on a similar series of issues, and the author felt that any form of content analysis would not be necessary. Rather, the author undertook a close reading of the statements and drew out a number of themes that identified, and illustrated, the retailers' collective approach to modern slavery. The chapter draws extensively on selected quotations from the retail companies' websites. The aim here, was to explore how the selected companies publicly expressed, and evidenced, their approaches to

modern slavery, and the author was of the opinion that an important way of capturing such approaches was to cite the companies' own words, not least in that such citations could convey corporate authenticity, and offer greater depth of understanding.

5. Findings

The modern slavery statements published by the UK's top ten retail companies varied in style and content, but rather than describing each statement in detail, the author looked to identify, and draw out, a number of general themes. More specifically, the author identified eight interlinked themes, namely, corporate commitment; human rights policies; risk assessment and due diligence; audit; awareness raising, capacity building and training; collaborative activities; performance measures; and the impact of the COVID-19 pandemic; which effectively captured the spirit of the selected retail companies' collective approaches to modern slavery, as expressed in their modern slavery statements.

Corporate commitment was expressed in a variety of ways. Simon Roberts, Sainsbury's Chief Executive, stressed that *'human trafficking, forced labour, child labour and domestic servitude are abhorrent practices'*, and that *'as a business we stand against all forms of modern slavery, and the exploitation of other people for personal gain'* J. Sainsbury (2022, p. 2). In a similar vein, Amazon (2022, p. 1) reported *'Amazon does not tolerate modern slavery'*, and is *'committed to expanding our work to understand and address any modern slavery risks that may arise in the course of our business.'*

Some of the retailers' corporate commitments to addressing modern slavery, were arguably less emphatic. In his *'Foreword'* to Asda's (2022a, p. 4), 2022 *'Modern Slavery Statement'*, Moshe Issa, the company's co-owner, for example, claimed that it was looking to *'mitigating the risks of modern slavery in our business and supply chains'*, while Morrisons (2022, p. 12) reported *'addressing the risks of modern slavery and labour exploitation is clearly a priority for Morrisons.'*, and the Walgreen Boots Alliance (2022, webpage) recognised *'its responsibility to address and mitigate the risks of modern slavery and human trafficking in its operations and supply chains.'* Aldi (2022, p. 4) recognised that modern slavery was *'a global problem'*, and that its approach was to *'understand how and where modern slavery occurs and to continually improve the processes that we have in place to prevent it'*, and Tesco (2021, p.1) claimed *'we are fully committed to playing our part in eradicating modern slavery.'*

The retailers' commitments to opposing and addressing modern slavery were often couched within wider policies on human rights. Aldi (2022, p. 10), for example, claimed that *'tackling modern slavery is part of a broader commitment to respecting human rights and further improving working conditions throughout our supply chains.'* Further Aldi reported that the company had several policies in place to address modern slavery, including the Universal Declaration of Human Rights, and Aldi's Social Standards in Production Policy, which *'prohibit human rights infringements and underpin workers' rights to freedom of association and collective bargaining'* (Aldi 2022, p. 10). Morrisons (2022) reported that its approach to modern slavery was informed by the United Nations Guiding Principles on Business and Human Rights and underpinned by the principles of the Universal Declaration

of Human Rights, and by its Ethical Trading Code, which includes specific commitments to modern slavery, forced labour and responsible recruitment. Lidl's (2022, p. 8) *'Buying Policy on Human Rights in the Supply Chain'* outlined details of the company's commitments to *'upholding supply chain labour standards including, no forced labour and no child labour.'*

Risk assessments and due diligence offered some insights into the retail companies' awareness of the sources, and the nature of modern slavery. Lidl (2022, p. 9), for example, reported that *'as part of our human rights due diligence process, we structure our modern slavery strategy on a risk based approach, ensuring we systematically address the most adverse actual and potential risks within our business and supply chains as a priority.'* Marks and Spencer (2022, p. 6), recognised that *'the manifestations of modern slavery are complex and hidden'*, before itemising the various elements in its risk assessment procedures. These elements included the detailed mapping of supply chains and operations, supplier surveys, supplier engagement, and discussions with expert stakeholders. Looking to the future, Marks and Spencer (2022) also reported looking to use emerging technologies, such as worker voice apps, to reach further into their supply chains and to hear directly from workers.

J. Sainsbury (2022) claimed that its approach to risk assessment enabled the company to take targeted action in those supply chains most likely to be exposed to modern slavery risks. Geographically, the company identified cocoa sourced from Ghana, Ivory Coast and Colombia, tea sourced from Kenya, Rwanda and Malawi, and bananas sourced from Colombia, Dominican Republic, Ghana, Cameroon, St. Lucia and Panama, for example, as presenting a high risk of forced labour within their supply chains. Amazon, reported engaging in robust due diligence of its own branded products, prioritizing mechanisms to drive continuous improvement, and working closely with suppliers to remedy identified issues. Morrisons, reported that where the risk of modern slavery is identified in the first tier of its supply chains, the company required its suppliers to demonstrate their compliance with its Ethical Trading Code, and that all suppliers were encouraged to take ownership of modern slavery issues, and to undertake their own due diligence, mitigation and improvement activity.

Audits were seen as an important element the selected retailers' approach to modern slavery. Amazon, for example, reported using independent auditors to assess potential or current suppliers for modern slavery indicators, and the company claimed that auditors conduct regular on-site inspections and confidential worker interviews. The company revealed that if the findings from an audit required *'a more hands on approach, we also send Amazon teams or third-party experts to conduct further assessments'* (Amazon 2022, p. 7). Morrisons (2022) reported that where risks of modern slavery were identified, the company required its suppliers to demonstrate compliance with its Ethical Trading Code through the provision of third-party audits. In a similar vein, Marks and Spencer (2022) reported requiring all its food, household goods, and clothing suppliers to complete a self-assessment questionnaire and an ethical audit conducted by a third party.

The selected retail companies acknowledged the importance of awareness raising, capacity building, and training in looking to address modern slavery. Morrisons (2022, p. 15,

for example, claimed that *'training and awareness programmes continue to be at the forefront of our approach to addressing modern slavery risk in our business and supply chains.'* Tesco (2021, p. 20) reported that *'raising awareness of modern slavery, both within our business and our supply chains, is an important part of our strategy'*, and *'we know that identifying potential and actual cases requires upskilling colleagues and suppliers to understand the drivers of modern slavery as well as the possible indicators.'* The Co-op (2022, p. 12) emphasised that the company *'worked closely with colleagues and suppliers to help build their capacity to identify, manage, and deal with risks of modern slavery'*, and reported on its *'well-established ethical trade supplier engagement programme, which is designed to support suppliers in tackling human rights issues affecting workers globally.'*

Collaboration was also seen as an important tactic in tackling modern slavery. Morrisons (2022, p. 17), for example, argued *'working with others to increase our understanding and maximise the impact of our actions to tackle modern slavery remains a cornerstone of our approach'*, and reported on its collaborative partnerships with Better Cotton, the Food Network for Ethical Trade, the Slave Free Alliance, the Gangmasters and Labour Abuse Authority, and the Modern Slavery Intelligence Network. The company also reported hoping to be able to use its Better Cotton certification, to tackle forced labour in the lower tiers of its clothing supply chain. In a similar vein, J. Sainsbury (2022, p. 19) *'believe collective action is the only way tackle global challenges at the scale and speed required'*, and outlined its collaboration with the Consumer Goods Forum, Human Rights Coalition and Food Network for Ethical Trade.

A number of the selected retail companies suggested that they were moving towards reporting on their performance, and on identifying key performance indicators, in meeting their commitments to combatting modern slavery. The Co-op (2022), for example, reported on its progress against each of the previous year's targets on managing the risk of modern slavery; training, capacity building and collaboration; and campaigning on modern slavery; and set a number of future targets. These future targets include championing the role of women and vulnerable people in the company's supply chains, and identifying opportunities to foster collaboration between suppliers' shared learning, Asda (2022), reported on its introduction of four annual key performance indicators in its approach to modern slavery, and J. Sainsbury (2022, p. 14) outlined a number of key performance indicators, designed to *'tell us how effective the interventions and programmes we run, are.'*

Many of the retail companies' modern slavery statements outlined the impact of the COVID-19 pandemic on modern slavery and on how they addressed it. Amazon (2022, p. 1), for example, argued that *'the devastating health and economic crisis caused by the COVID-19 pandemic increases the risk of modern slavery and other forms of exploitation for many people and communities.'* More specifically, Amazon (2022, p. 1) suggested that *'the COVID-19 crisis exacerbates underlying factors that can make people vulnerable to modern slavery, including poverty, financial insecurity, lack of mobility caused by local or national shutdowns, and supply chain and logistics challenges due to changes in demand.'* In a similar vein, in recognising that *'COVID-19 has had a huge impact on the world'*, Asda (2022, p. 23) reported that *'the social and economic disruption is creating emerging risks greater than ever before and has the potential to have a profound impact on vulnerable people who could*

be subjected to Modern Slavery.’ The Walgreen Boots Alliance (2022, webpage) reported that *‘as COVID-19 limited our ability to conduct onsite assessments in areas heavily impacted by the pandemic, we developed additional approaches to monitor supplier compliance, including the implementation of remote virtual audits.’*

6. Discussion

The retail companies’ modern slavery statements captured their public approach to what is a complex and challenging issue, but some wider issues merit reflection and discussion. This exploratory review suggested that the retailers’ corporate commitments to address modern slavery within their supply chains were not only at least one step removed from their direct corporate control, but also that they were aspirational and expectational. Aspirational, in that they certainly expressed a desire to tackle modern slavery problems, and expectational in that the retail companies expected their suppliers to comply with standards and requirements established in response to UK government legislation.

While assessing, monitoring and tackling modern slavery presents a major challenge for the retail companies, many of them 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, webpage), for example, argued that such processes 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.’* Anti-Slavery International (2019, webpage) also argued that *‘forced labour is often hidden’*, that *‘it is often found in the informal sector, in the early stages of production, often some steps down the supply chain’*, and that *‘subcontracting can also hide forced labour as it adds layers between the company and the worker’*, which *‘are out of the scope of many audits.’* Further, Anti-Slavery International (2019, webpage) claimed that *‘even when auditing is of high quality, audits by necessity are merely a snapshot of a particular moment in a particular part of the production system’*, and that *‘the auditing mindset tends to be linear and mechanistic and may compartmentalise symptoms, preventing observers from seeing the whole complex picture which might together constitute forced labour.’*

Gold et al. (2015, p.488) used the term *‘audit fraud’* to describe illegal activities hidden by the suppliers from the auditors. Gold et al. (2015, p. 488) also suggested that *‘slave-holders skimming huge profits from their activities will not be susceptible to change in response to premium-price incentives for social standards from the buying company’*, rather *‘they might instead take the premium and at the same time extend their existing profitable business model.’* In a similar vein, LeBaron et al. (2017, p. 958) 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, 958) 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.’*

The concept of the modern slavery statement has attracted a number of criticisms. New and Hsin (2021, webpage), 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, p. 2) 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, p.6) 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 noncompliance.'*

More generally, the majority of large retail companies have taken an increasing interest in corporate social responsibility in recent years, but there are issues about where tackling modern slavery sits within corporate social responsibility policies. New (2015), for example, looked to examine how modern slavery within supply chains challenged conventional thinking and practice on corporate social responsibility. More specifically, New (2015, p. 697) pointed out *'the potential differences between modern slavery and other corporate social responsibility issues'*, and highlighted *'the paradox that firms' approaches to the issue may run in parallel with actions that foster the problem in the first place.'* That said, all the selected retail companies publish annual corporate social responsibility reports, and many of them have outlined how they have addressed modern slavery in these reports. Asda (2022b), for example, reported on joining the Slave Free Alliance, and on undertaking a gap analysis of the hidden risks of slavery in its supply chain.

This exploration of the modern slavery statements published by the selected retail companies can be viewed against the limited literature on modern slavery summarised in Section 3. More specifically, the selected modern slavery statements provided little evidence of the employment of innovative approaches to identifying modern slavery, as recommended by Stevenson and Cole (2018), or of the development of new tools and indicator systems as suggested by Gold et al. (2015). At the same time, some of the selected retailers' modern slavery statements did illustrate Geng et al.'s (2022) findings about how commitments to addressing modern slavery were influenced by the retailers' sourcing of goods and services from countries with high slavery risks, and about the importance of established corporate social responsibility programmes. Further, the selected slavery statements also illustrated Nolan and Bott's (2018) emphasis on the importance of due diligence and drawing on the experiences of a range of stakeholders, though these statements did not reveal a focus on detailed disclosure requirements, or regulatory consequences for failure to comply with the relevant legislation.

On the theoretical side, contingency theory helps to shed some light on how the selected retail companies approached modern slavery, but perhaps only in so far as it signals that some of the characteristics of these companies, namely that their use of globally sourced raw materials and labour supplies, seem to make them susceptible to modern slavery. In highlighting the role and importance of a number of stakeholders, including suppliers, employees, and customers, stakeholder theory might be seen to be useful in informing how the UK's leading retail companies have developed, and may enhance, 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

parties involved in modern slavery. Arguably more positively, institutional theory provided a useful framework to help interpret how the selected retail companies had responded positively to the 2015 Modern Slavery Act. This was reflected, for example, in the companies' approaches to raising awareness, capacity building, and training, and risk assessment, and due diligence. At the same time, some companies' focus on internal, rather than independent, auditing, and their limited approach to identifying, and reporting on, key performance measures, suggests that institutional theory does not capture the full story in conceptualising corporate approaches to modern slavery.

Finally, and more critically, there are fundamental questions about the effectiveness of modern slavery statements in combatting, and ideally eradicating, modern slavery, not least because Monciardini et al. (2021, p.326) suggested that within the UK noncompliance with the 2015 legislation *'is a common occurrence.'* At the same time, Banerjee (2020, p.416), argued that codes of conduct and multi-stakeholder initiatives will not *'address the real problem of modern slavery'*, and claimed that *'most corporations do very little apart from issuing public statements and commitments to eradicate forced labour.'* Indeed, Banerjee (2020, p. 416) argued that the current initiatives *'give the appearance that firms and suppliers are working to address the problems with little evidence of outcomes.'* More generally, in reviewing over 16,000 modern slavery statements produced in the five years since the passage of the 2015 Modern Slavery Act, the Business and Human Rights Resource Centre (2021) concluded that while the Act had raised awareness and produced some improvements, it had failed in its stated intentions to eradicate modern slavery from UK supply chains.

7. Conclusions

This chapter has provided an exploratory review of one of the ways some of the UK's leading retailers have addressed modern slavery in their supply chains via an examination of their modern slavery statements. As such, the paper adds to the current very limited literature on modern slavery within retailers' supply chains. The spirit of the retail companies' modern slavery statements was effectively captured by eight interlinked themes, namely corporate commitment; human rights policies; risk assessment and due diligence; audit; awareness raising, capacity building and training; collaborative activities; performance measures; and the impact of the COVID-19 pandemic. Further, the author suggested that in some ways the selected companies' approaches to modern slavery were aspirational and expectational, and that they raised concerns about the nature of the auditing processes employed in the companies' supply chains.

The author recognises that this chapter has a number of limitations. The empirical material on which it is based is drawn exclusively from the corporate websites of the selected retail companies, at a set point in time, and does not include any primary information supplied by the retail companies' executives, managers or employees, or any information obtained from suppliers. However, the author believes this approach is appropriate in what is an explanatory study, that the chapter makes a small contribution to an area that has received very limited attention to date in the academic literature, and that it may provide a platform for future research into modern slavery in retail supply chains.

Here, number of potential research opportunities into corporate approaches to modern slavery within retail supply chains can be identified. The ways in which a wider variety of retail companies, both large and small, address the issue of modern slavery merits attention, and could include large scale questionnaire surveys of, as well as personal interviews and focus group meetings with, senior company executives, to learn how retail companies 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. However, while modern slavery within retailing, offers a potentially rich variety of research opportunities, it is important to recognise that it is a very challenging research arena.

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