

# Co-op Modern Slavery and Human Trafficking Statement 2017



## Progress against our 2016 targets

We provide a full account of what we've been doing in 2017 to prevent modern slavery taking place in our business and supply chains in our [Modern Slavery Statement](#) - including how we've been addressing the specific commitments we made in 2016<sup>1</sup>. For completeness and transparency, we have set these out in the table below, which provides a clear indication of progress against each of the targets we set ourselves for the year.

What we said we'd do in 2017	How have we done?	What have we done? <sup>2</sup>
<b>(i) Enhance our policies and due diligence on modern slavery</b>		
<b>(a) In our food business</b>		
<p><b>Ensure our key Tier 1 Co-op Food own-brand suppliers:</b></p> <ul style="list-style-type: none"> <li>• have transparent policies and processes in place to prevent, identify and address modern slavery on their own sites and supply chains</li> <li>• develop and share their risk-based audit programmes to manage issues in their supply chains</li> </ul>	Achieved	In 2017 we carried out 25 ethical trade review meetings with key suppliers to assess progress against set ethical targets, address capacity issues, and agree future priorities in managing issues in global supply chains. Each key supplier is measured on implementation of risk assessment and due diligence processes to identify and address issues at their own site and in their supply chain, as well as their commitment to tackling modern slavery and share plans with the Co-op. (Given the changing nature of our supply base, this is an ongoing target.)
<b>Embed the new Sedex forced labour indicators into reporting and risk assessment processes for own-brand suppliers</b>	Behind schedule	In 2017 Sedex introduced a new feature that allows companies to review audit data in a way that helps inform risk assessment. We've reviewed Co-op data using this new function, but still need to determine how we'll use the analysis, and embed it in our reporting and risk assessments (page 7).
<b>(b) In our other operations</b>		
<b>Finalise all new people policies relating to modern slavery</b>	On track	We amended and launched our Whistleblowing Policy, which now tells colleagues how to raise concerns about modern slavery. We're still working on our Eligibility to Work Policy which will be launched early in 2018 (page 6).
<b>Develop our new Group Procurement Policy</b>	Achieved	We launched our new GSNFR Buying Goods and Services policy in September 2017. Over 350 colleagues were trained on the new policy, with a focus on ethics and modern slavery (page 6).
<b>Review our SPSP and its role in due diligence</b>	On track	We updated our SPSP in 2017 to make sure it fully reflects our ethical expectations of suppliers, including those on modern slavery (page 6), and started sharing it with suppliers. In 2018 we'll review the use of the SPSP in risk management.
<b>Develop and implement a strategy for prioritising suppliers based on Ethical Trade and Human Rights (ET&amp;HR) risk (including the risk of modern slavery)</b>	On track	We finalised our ET&HR risk criteria for GSNFR and have used these to prioritise our spend categories (page 9). We're now developing programmes to manage risks associated with our highest-risk suppliers.
<b>Start introducing high-risk suppliers to Sedex</b>	Achieved	We piloted our use of Sedex for non-food suppliers in April, starting with our Funeralcare masonry suppliers (page 9). Towards the end of 2017 we started introducing some of our construction, facilities management and insurance suppliers to Sedex.

<sup>1</sup> Co-op Modern Slavery and Human Trafficking Statement 2016, pages 9-10.

<sup>2</sup> Page numbers refer to a fuller explanation in the 2017 statement.

What we said we'd do in 2017	How have we done?	What have we done?
<b>(ii) Training and collaboration on modern slavery</b>		
<b>(a) In our food business</b>		
<b>Reach over 1,000 people through 20 supplier events to build supply chain capacity and share best practice</b>	Achieved	In 2017 we held 27 events in four countries reaching 1,005 delegates. This is part of our supplier capacity building programme to address the underlying causes of human rights issues and build suppliers' resilience to labour shortages (Box 4, page 10).
<b>Train remaining suppliers with UK sites on tackling modern slavery in UK businesses</b>	Achieved	100% of key suppliers with sites in the UK have now had one or more delegates attending a Stronger Together training session since the roll out of training (2013-2017) (Box 5, page 11). Given the changing nature of our supply base, we will continue to make sure all new suppliers have the opportunity of free training.
<b>Make sure relevant Tier 1 suppliers attend a new workshop on tackling modern slavery in global supply chains</b>	Achieved	We gave in-depth training to our key strategic suppliers through our supplier engagement programme and our support of collaborative initiatives such as Stronger Together and FNET (page 12).
<b>Work collaboratively to get modern slavery training into global supplier forums</b>	Achieved	In 2017 we worked with the Spain Ethical Trade Forum to deliver three events on modern slavery and responsible recruitment (page 12). We spoke at the launch of Stronger Together in South Africa to raise awareness of the Modern Slavery Act and retailers' commitment to tackle modern slavery in global supply chains.
<b>Roll out a new Advanced Ethical Trade session including a focused session on MS to key colleagues who work with our suppliers</b>	On track	We developed our new half-day training course in 2017, with an external expert delivering two sessions to key colleagues (page 11). We'll roll out the mandatory programme to all relevant colleagues in 2018. <sup>3</sup>
<b>(b) In our procurement, HR and wider business operations</b>		
<b>Develop our new Procurement Academy, to help make sure that we take a standardised approach to sourcing and supplier management, including on modern slavery</b>	Achieved	We established our Procurement Academy in 2017, to share best practice, create minimum standards, and give training on sourcing and supplier management.
<b>Roll out a business-wide training and awareness plan on ethical sourcing and modern slavery for all colleagues dealing with suppliers of goods and services we use across the business</b>	Achieved	'Introduction to ethical sourcing' training was rolled out across all GSNFR procurement colleagues in 2017, and will be extended to supplier management colleagues across the business in 2018 (page 11).
<b>Work with the GSNFR 'Common Interests Group' to develop a strategy for sharing information on suppliers</b>	Achieved	The new Sedex GSNFR Working Group is now well established, with more meetings taking place in 2017 (page 12).
<b>Train key HR colleagues to identify potential modern slavery cases in our own business and where this may apply to prospective candidates, to ensure they know how such cases should be reported and managed</b>	On track	We developed and started rolling out new online training on modern slavery for colleagues in our HR and resourcing teams (page 11). Training will continue into 2018 to reach over 220 of these colleagues and will be included in team inductions.
<b>Form a new ET&amp;HR Practitioners' Group for colleagues from across the business to help create consistent processes to monitor supply chain labour standards</b>	Achieved	We held four meetings of our new Practitioners' Group in 2017 (page 11).

<sup>3</sup> The new course is in addition to regular ethical trade induction training for all Commercial colleagues (seven sessions delivered in 2017).

What we said we'd do in 2017	How have we done?	What have we done?
<b>(iii) Campaigning on modern slavery</b>		
<b>Create 30 new work placements across our businesses</b>	On track	15 placements were created by the end of 2017, and we're on track to hit our target of 30 placements by March 2018 (page 13).
<b>Develop new partnerships with charities who are experienced in supporting survivors of modern slavery</b>	Achieved	During 2017, as well as our partnership with City Hearts, we also set up partnerships with six more charity partners, and started discussions with four more (page 13).
<b>Engage key influencers, policy makers and other businesses, to encourage them to adopt the Bright Future model and campaign for better support for victims</b>	Achieved	We've engaged a range of policy makers, influencers, and other businesses and organisations, as part of our campaign for better support for victims (page 14).
<b>Work with a minimum of five suppliers, to help them support victims through work placements in their businesses</b>	Behind schedule	Four of our suppliers actively engaged with the programme in 2017 and aim to provide placements in early 2018 (page 13). We've shared information on the programme at our regional supplier forums.
<b>(iv) Measuring our progress</b>		
<b>Continue to develop and report on Key Performance Indicators (KPIs) to show progress on modern slavery in our food business</b>	On track	In 2017 we continued to use a comprehensive set of KPIs to provide insight into the performance of our Food Ethical Trade programme, including on modern slavery. Working collaboratively with Stronger Together we supported the development of a new online reporting tool to help businesses monitor their progress, highlight next steps in addressing modern slavery risks in their business and supply chains, and benchmark performance. This tool will be rolled out to key suppliers in 2018.
<b>Develop measures to assess the effectiveness of policies and controls on modern slavery for procurement of goods and services we use in our own business</b>	Achieved	We put steps in place to measure our own performance against our modern slavery policies, and to measure suppliers' activities against our supplier policies (eg our SPSP and SSC). These include measures to assess the effectiveness of our controls during the procurement process (eg internal compliance logs, updated RFP questions for suppliers and the use of Sedex).
<b>Measure and report on our campaign activity on modern slavery and the impact it's had, including an independent evaluation of Bright Future</b>	On track	We commissioned and published an interim review of Bright Future in October 2017 (page 14), and continue to monitor the reach and impact of our campaign activity.