

G's – Tackling Modern Slavery



Risk to action

Who is G's?

G's is one of the leading European fresh produce suppliers. The group has operations in the UK, Spain, Senegal, Central Europe, and USA, involving 32 sites which employ over 10,000 workers.

Summary

This case study particularly focuses on G's approach to tackling modern slavery (MS). This work fits within their wider approach of moving 'beyond compliance', shifting beyond audit and verification to ongoing performance assessment, stakeholder engagement, ownership and embedding through training and capacity building. This also aligns with their transition to a mature Human Rights due diligence approach where the focus moves from detection to mitigation and remediation.

Their approach to modern slavery focuses on prevention, detection, case management and leadership. As well as a comprehensive policy framework and training programme, they have a particular focus on Responsible Recruitment, to identify and tackle illicit recruitment fees in their direct and indirect recruitment streams. They are also taking a leadership approach by initiating and facilitating collaborative efforts to tackle the issues. Their actions and initiative has contributed to pioneering innovative approaches in the industry, such as the [Modern Slavery Intelligence Network](#).



What prompted the action?

G's has been acutely aware of the real and growing risks around modern slavery in fresh produce supply chains for many years. They have been assessing labour providers since the 1990s, changed their strategy to focus more on direct recruitment in the 2000s, established their MS strategy and programme in 2017 and started their on-site MS awareness raising training in 2017.

Despite these efforts, G's couldn't avoid being caught on the edge of [Operation Fort](#) in 2019, with some of the victims allocated in G's farms for a small number of days. This led G's to understand that no business is fully protected from modern slavery and therefore businesses should deepen their collaboration instead of trying to fight modern slavery on their own. This prompted the action of running an industry Modern Slavery Conference, in January 2020 under the title "Working together to prevent modern slavery". This brought together over 250 relevant players including retailers, suppliers, public sector, experts and academia, to work together to brainstorm and initiate practical action to tackle the issues of modern slavery in the fresh produce sector in the UK. This conference resulted in the establishment of the Modern Slavery Intelligence Network (MSIN).

Taking action

Training

G's has an extensive training programme, from director to worker level, to raise awareness and boost ownership of their programme to mitigate and tackle modern slavery. Tailored training is provided for HR managers, harvest managers, recruitment teams and [Seasonal Work Scheme](#) operators to ensure they can spot signs or 'yellow flags', encouraging people to raise concerns, even if they aren't totally sure whether an issue is present. The training is targeted and practical, using real examples, with reference to tools, policies and whistle blowing channels. They also train 'site champions' with additional support on case management and victim care.

Responsible Recruitment

As part of G's efforts to map forced labour risk indicators, they have put significant effort into determining potential recruitment fees and associated costs in their direct and indirect recruitment channels.

Recruitment streams are becoming more complex with the Seasonal Worker Pilot Scheme. Under the scheme, labour users cannot directly recruit their own seasonal workforce, instead they must now rely on using external recruitment companies (seasonal worker scheme operators), which increases the risk of seasonal workers incurring recruitment fees. G's identified the need to build a more accurate picture through semi-structured qualitative interviews of workers, in specific site visits, with interpreters. This mostly constituted open questions where the worker was invited to describe their recruitment journey in their own words, without leading questions. G's risk assessed the different streams of recruitment and focused the interviews on the high-risk areas. This has allowed them to map the complexity of fees, costs and related systems, and more importantly gain a detail understanding of the challenges and risks their seasonal workforce face during their recruitment journey.

Industry leadership and collaboration - [Spanish Forum for Ethical Trade \(SFET\)](#)

Co-op initiated this group, in partnership with key suppliers operating in Spain such as G's. It has now expanded to become a wider forum involving other retailers and exporters. G's has been deeply involved in the forum, holding many roles including working group leader, governance group and technical group member. They also acted as project coordinator for the Ethical Handbook for the Management of Labour Providers in Spain, which involved workshops and consultation with suppliers and Labour Providers. The handbook provides practical guidance to reduce the risk of labour exploitation by managing employment agencies responsibly within the agricultural sector. This has resulted in a significant shift in engagement of Labour Providers in the country, who were initially resistant to the efforts, but who now have more of a common understanding of the importance and the benefits to their businesses.



This case study has been developed with the support of Co-op as part of Co-op's 2021 'Treating People Fairly Awards' at which G's was Highly Commended. The awards celebrate excellence in human rights practice, encourage suppliers to learn from each other and inspire new ways of mitigating future threats to worker welfare. Supplier entries were assessed by an independent, expert panel and awards were presented at a Co-op supplier event. G's has supplied to Co-op for 7 years. Click [here](#) and [here](#) to learn more about human rights at Co-op.

Taking action

Modern Slavery Intelligence Network (MSIN)

G's co-founded the Modern Slavery Intelligence Network (MSIN), a non-profit collaboration between a limited group of retailers and suppliers in the UK food sector. The idea came up as a proposal in the Modern Slavery conference G's ran in 2020, to galvanise action across the sector following Operation Fort. G's had initial conversations with a key retailer and then brought in other retailers and suppliers to initiate the network.

The Network is a structured intelligence sharing mechanism between its members which will enhance the effectiveness of their contribution to the disruption of modern slavery and labour exploitation practices. The criminal networks which engage in modern slavery and severe labour exploitation are dynamic and mobile - which is why there are established and well-known channels for sharing information of suspected activity with authorities such as the GLAA (Gangmasters and Labour Abuse Authority). Yet intelligence sharing is also of use to legitimate private sector companies which are on the frontline of attempting to detect and disrupt hidden labour exploitation. Members within the network are aware of the sensitivity of intelligence relating to exploitation and modern slavery and, in coordination with relevant authorities, care is being taken to establish clear processes which do not undermine official investigation or put potential victims at risk.

The MSIN is now functioning, with an online platform managed by 'Stop the Traffik', where members can submit and upload data, which is managed by a professional service to ensure data shared has any sensitive information removed. G's has taken responsibility for some of the administration and finance tasks of the network, until it is a separate limited company.

G's has taken a leadership approach to initiating and significantly contributing to collaborative efforts to tackle complex issues.



Making
an
impact

Effective Grievance Mechanisms

At the forefront of G's Modern Slavery Strategy is capturing workers' voice and needs, whilst also ensuring that this is channeled into a mechanism for remediation for those workers. In addition to their site and group grievance mechanism, G's enables two different channels to confidentially report any concern or suspicion. Internally, workers can reach out to the Group Central Ethics team via email or phone call. Externally, a multilingual anonymous 'Speak Up' platform can be used to report any concern.

Moving forward

As a follow up to their efforts to map recruitment fees, G's is now putting processes in place to uphold their commitment to the Employer Pays Principle and United Nations Guiding Principles on Business and Human Rights (UNGPs). Within the [FNET](#) Recruitment Fees working group, discussions are ongoing regarding the practical implications of implementing the Employer Pays Principle, including how to fulfil the requirement of reimbursing any recruitment fees identified.

What makes this a leadership approach?*

Proactivity

G's has a mature strategic approach to tackling modern slavery through comprehensive policies, responsible recruitment, grievance mechanisms and collaboration. They have been proactive in recognising the need for collaborative, industry-wide action to deal with the root causes of modern slavery, by convening the MS conference in 2020 and seeing that through to co-founding the MSIN.

Ownership

G's have been working to limit risk of exploitation to workers and worked to develop a comprehensive beyond compliance and modern slavery approach. G's has played an active leadership role for more than a decade on modern slavery, openly sharing good practice for others in the sector to learn from.

Partnership

G's have significantly contributed to collaborative efforts to tackle complex issues, championing good practice in collaborative initiatives such as the Spanish Forum for Ethical Trade (SFET) to the Food Network for Ethical Trade (FNET). By playing a pivotal role in the set-up of the Modern Slavery Intelligence Network (MSIN), they have worked with others to establish a collaboration in an area where no other initiative of its kind currently existed.

Lessons learnt

- Collaboration is essential to tackle big complex issues.
- Don't ignore possible problems, be brave in facing issues and talk honestly with customers, and even competitors, to make meaningful change happen.

* Key behaviours that Co-op champion are proactivity, ownership and partnership. Click [here](#) to learn more about Co-op's supplier engagement programme. Co-op's 'Supplier's Guide to Ethical Trade' sets out the standards suppliers are expected to meet.